



Protect America's Climbing

August 15, 2013

Menagerie Seasonal Boundary Change for Species Protection Project
Environmental Assessment
Willamette National Forest
Sweet Home Ranger District
4431 Highway 20
Sweet Home, OR 97386

RE: MENAGERIE SEASONAL BOUNDARY CHANGE FOR SPECIES PROTECTION PROJECT

Dear Natural Resource Team:

The Access Fund appreciates this opportunity to provide input during the scoping phase of the Menagerie Seasonal Boundary Change for Species Protection Project Environmental Assessment (EA). We are working closely with local climbers, raptor experts, and the Sweet Home Ranger District to provide national climbing/raptor management expertise,ⁱ local knowledge, volunteers,ⁱⁱ and educational outreach to the climbing community. The Menagerie Wilderness is a special place to our members, and this EA is a great opportunity to forge a model management plan based on the best available science and practices. These comments are intended to assist planners develop management policy that protects nesting peregrines and public access to the Menagerie Wilderness.

The Access Fund

The Access Fund is the national advocacy organization that keeps U.S. climbing areas open and conserves the climbing environment. We represent over 2.3 million climbers with five core programs performed on the national and local levels: climbing management policy; stewardship and conservation; local support and mobilization; land acquisition/protection; and education. The Access Fund supports managing climber access when necessary to protect sensitive natural and cultural resources, including wildlife. Indeed, we manage and publish the largest list of wildlife-related climbing closures in the country.ⁱⁱⁱ

For more than twenty years, we've worked with federal, state, and private land managers to develop and implement climbing management plans that are currently in use across the country, and have organized and hosted several national climbing management conferences, attended by hundreds of land managers from across the country.^{iv} In many cases, climbers actively assist^v by maintaining trails, removing trash,^{vi} and participating in the locating, monitoring, and reporting on species of concern.^{vii} The Access Fund currently holds memoranda of understanding concerning climbing management/resource conservation with the National Park Service,^{viii} the Bureau of Land Management,^{ix} and the United States Forest Service.^x To learn more about the Access Fund, see www.accessfund.org.

Comments

Climbers care deeply for the places they climb and for the opportunity climbing affords to interact with the natural world. Watching a peregrine effortlessly soaring on a thermal is typically more memorable than the climb itself. It is the wildlife and natural beauty of places like the Menagerie that draws climbers, and protecting an area's ecology is central to conserving the climbing experience. Climbing is a low impact activity that managed properly poses no threat to cliff dwelling raptors, such as peregrines. A combination of seasonal buffers, based on credible evidence, monitoring/data collection and expert participation can protect peregrines and keep public access restrictions to a minimum. Our group has the interest, resources, and experience to assist the Willamette National Forest design and implement an effective management plan for protecting peregrines nesting in Menagerie Wilderness. We also have independent national experts willing to provide scientific evaluation of data and comments.

The Access Fund and local climbing community appreciate the Willamette National Forest's willingness to reconsider the way in which peregrines are managed within the Menagerie Wilderness. Unfortunately, the recent history of climber and Forest relations regarding peregrine management has not always been smooth. Based on the information we received in response to our latest Freedom of Information Act (FOIA) request, we feel climbers have been unjustifiably accused of violating the closure and disturbing the nest. Greg Orton's comments use the FOIA information to detail why we believe climbers have been wrongly implicated and this comment letter will focus on how best to move forward and how the climbing community can assist the Forest monitor and manage peregrines in the Menagerie. Protecting peregrines is important to climbers and climbers are very familiar with and routinely comply with seasonal closures to protect cliff nesting raptors across the county.

Our two main concerns regarding the proposed action for the Menagerie Seasonal Closure Boundary Change for Species Protection are: 1) There is no indication that the proposed seasonal closure period (January 15th through July 31st) will be subject to opening earlier when the nest is unoccupied, fails, or if fledging occurs early; and, 2) The overall size of the closure is unnecessary (a.k.a. buffer zone).

Seasonal Closures

Generally, seasonal closures to protect peregrines run from January, February, or March and can last until August. The size, location, and length of a closure can vary each year based on nest location and success or failure of the hatch. Yosemite National Park,^{xi} Rocky Mountain National Park,^{xii} and the Arapahoe National Forest^{xiii} (Colorado) are great examples of reasonable seasonal closures that utilize site specific considerations like view shed, monitoring, and nest location to close only certain cliffs or just specific portions of a cliff (as is the case with El Capitan in Yosemite). Further, each location uses volunteers to help monitor any active nests to determine if the closure can be lifted early. We believe that this is the best approach to balancing recreational access and raptor protection. Additionally, active monitoring provides crucial data to better understand the reasons why nests succeed or fail while minimizing access restrictions.

Local climbers in the area are willing to volunteer their time to help the Willamette National Forest effectively manage climbing and raptor protection. The Menagerie's management strategy should follow the above examples and ongoing monitoring can provide important data that allows the closure to be re-opened or re-shaped based on the location and status of any active nest/s. If no nesting occurs or a nest fails, the area can be re-opened. Similarly, a closure can be lifted early following a successful fledge. Either way, continued monitoring minimizes access restrictions and provides valuable information regarding peregrines in the area.

Buffer Zone

The current closure boundary encompasses 1,310 acres to protect one active nest. The proposed closure boundary basically encompasses the same acreage. Prior to the peregrine being delisted, recommended buffer zones typically involved circular ½ or ¼ mile buffer zone around an active nest. However, many world renowned rock climbing destinations, including but not limited to Yosemite National Park, Rocky Mountain National Park, Arapahoe National Forest, and Eldorado Canyon State Park, are successfully utilizing much smaller buffer zones that are tailored to the specific topography around the nest location.

As an example, Rocky Mountain National Park manages a heavily used climbing venue known as Lumpy Ridge by closing specific named rock formations with active nests: ***“When closed, the closures include the named rock formations and the areas surrounding the base of the formation. This includes all climbing routes, outcroppings, cliffs, faces, ascent and descent routes and climber’s access trails to the formation. Areas not listed above are presumed to be open. These closures will be lifted or extended as conditions dictate.”*** Closing specific climbs or sections of cliff within the immediate vicinity of an active nest protects nesting peregrines and minimizes public use restrictions. The Willamette National Forest should reconsider the size of the proposed closure and consider closing only the immediate area and rock outcrops with active nests. This technique is utilized successfully at the above mentioned locations and each of these areas receive far more climber user days than the Menagerie.

Monitoring/Data Collection and Expert Participation

Several human-caused and natural factors (totally unrelated to human activity) can lead to nest failure (such as: lead poisoning, shooting, transmission line/wind turbine collisions, parasites, poisons, egg predation, loss of a parent, etc...). Evaluating potential disturbances of peregrines from benign recreational activities, such as climbing, must occur within the larger context of demonstrable (i.e. data supported) causes of mortality and nest failure. Collecting such information and consulting an expert are critical to understanding and rule-out causes of nest failure and developing a management plan focused on conservation without unnecessarily restricting activities that pose no threat to peregrines.

Below is a letter written by Professor Clayton White, a well-known peregrine expert totally unaffiliated with the Access Fund. We asked Professor White to visit a county park in California known as Summit Rock to provide insight as to why the Park’s year round closure was unnecessary to protect the resident peregrines. Many of Professor White’s opinions are relevant to the situation at the Menagerie and we are willing to pay for an independent expert like Professor White to visit the site and provide their professional opinions. I have bolded the sections that are particularly applicable to the Menagerie:

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3 March 2012

BY EMAIL:

Robb Courtney, Director
Santa Clara County Department of Parks and Recreation
298 Garden Hill Drive
Los Gatos, CAS 95032

Re: *The Peregrine Falcon Nesting Site at Summit Rock,
Sanborn County Park*

Dear Mr. Courtney:

At the behest of Paul Minault of the Access Fund, I have put together some comments on our meeting of Monday, 13 February 2012 regarding the Summit Rock peregrine falcon nesting site in Sanborn County Park, Santa Clara County. I very much enjoyed meeting you and everyone else. I learned a great deal from all of you and broadened my perspectives by understanding your points of view. That is always a gratifying result. One of the great events for me was witnessing the appearance of the male peregrine, his typical behavior of giving a few calls, then drifting away. Such an event does not lose its thrill for me even though I have seen it countless times in diverse places over the past 50 years.

At the outset, I do hope that prior to making any official policy you should contact a few other peregrine falcon workers in order to glean their views on the issue. Please do not just take my statements as the only view. There are at least two people in California I might suggest, both of whom Don Rocha knows; Joel "Jeep" Pagel and Glenn Stewart, the latter of the Santa Cruz Predatory Bird Research Group, who I understand has already written you a letter about this issue. Additionally, should it be worth your time, I recommend Rene-Jean Monneret. He is a well recognized peregrine worker in France, has written widely, including at least two on books on peregrines, and spends a great deal of time in the Jura Mountains. There the limestone cliffs host both peregrines and climbers. His email is: rjmonneret@wanadoo.fr. I do hope that any decision made will weight heavily on the biology of peregrines, since that is the issue, and not on something administratively easy or political desires since they are not the issue.

For starters, there was a suggestion from Bruce Morris at the February meeting, based on his having traversed the mountain range within Santa Clara County, that there are other cliffs along the range, some larger than Summit Rock, that might have nesting peregrine falcons. It seems worthwhile to learn from Bruce where those cliffs are and check them during the peregrine breeding season. If there are other peregrines using such cliffs, then the concern that Summit Rock is the "only" natural site within the county becomes of lesser concern. I gather that county boundary lines, expressed several times, are being made critical to the issue.

I would also like to say that, as a field biologist, I believe that people and animals, including peregrine falcons, need to learn to live with each other. In the case of peregrine falcons, I have the greatest respect for those agencies that have identified their critical needs and provided for them, and at the same time have enlisted the aid and support of recreational, environmental and educational groups to take an active and participatory role in managing them and caring for their needs. Management models developed along these lines are helping with the management of wildlife of all types all over the world, and we need more of them.

Based on my previous experiences over many years and in many places, the Summit Rock eyrie is a marginal peregrine nesting site easily accessed by predators. Marginal nesting sites frequently have a high tum over rate of breeding adults and frequently attract first time breeders. There is good access to the Summit site by humans during the nesting season and to the actual nesting ledge by predators. The cliff's small size with a vegetative screen over the lower portion makes it more difficult to defend adding to the concept of it being marginal. Peregrines prefer to have big open spaces around and in front of the nest site providing more defensible space and room for them to make defensive dives called stoops. Don pointed out the one large pothole near the ground

used for nesting one year. Such sites are frequently used elsewhere but with little reproductive success.

Don also mentioned that the falcons have fledged young as late as September. This suggests that they are having second and or perhaps even a third clutches, which is also an indicator that they are losing eggs or nestlings. One could speculate that a pair selecting such a site are perhaps first time breeders with little experience. Over time this site is not likely to produce many offspring. While the value of this site might be enhanced by the closure of the entire area to human access during the breeding season, such a closure would not reduce or eliminate predation from natural predators such as ravens, eagles, raccoons, rats and so forth, who have access to the upper nest site via cracks that run from the bottom to the top of the rock. From the brief visit it seems that scavenger, and perhaps predator, access is indeed easy, since there were not the numerous feathers, carcasses and so forth that are usually found at "good" nesting cliffs. Such items seem to have been cleaned up.

From an esoteric or simply scientific viewpoint, it would be of interest to determine if the orangish coloration on the lower cliff face is a result of the lichens that grow, enhanced by nitrogen, where falcons continuously deposit feces. Such a condition, however, may simply result from that cliff knob being used as a bird perch and not from actual long term nesting use by falcons.

Concerns expressed at the meeting were several but could be, from my view, simplified to the following items. My response to each is based on experience, and the biology of peregrines is then given. I am not a stakeholder. The response is based on normal, "reasonable" recreational use of the cliff, including rock climbing, outside the breeding season, since closure during the breeding season is not at issue. If someone or something were to use the cliff throughout the day and throughout the year my response and perspective would be different. Any event might occur, of course, and I am not willing to speculate about extraordinary circumstances. I have not attempted to address those here.

1. The rarity, sensitivity, and vulnerability of the peregrine falcon warrant a "zero-risk" management strategy for the falcons at Summit Rock that includes year-round closure of the cliff.

Response. The peregrine falcon is not "rare" in a biological sense. Healthy populations are found in every continent except Antarctica. As a predator, it is of course much less common than many other species. Glenn Stewart has identified 33 nesting sites in the Bay Area and there are estimates that there is one unattached adult "floater" in the population for every pair. These floaters are ready to replace any individuals who do not survive to the next breeding season. And as a matter of fact there are replacements, sometimes two or three, at a given nesting site even during the breeding season. This is roughly 99 individual falcons in the greater Bay region. While this may not seem like a lot of falcons, **the peregrine has reached the population levels for official recovery under the Endangered Species Act, and the regional population is still growing, perhaps at about 5% a year, which is a very healthy rate.**

Nor is the peregrine falcon particularly sensitive to disturbance during the non-nesting season. The birds' response to disturbance is typically what we experienced during our meeting at the site—a series of brief "kek-kek-kek" alarm calls, after which the bird flies off to a safe distance and either ignores the site or watches the intrusion with little concern. Birds may remain around the eyrie during the non-nesting season because they are habituated to it, or they may move around their hunting territory using perches of convenience. They have little or no need for, attachment to or investment in the nest site during the non-nesting period, and they aren't greatly upset by recreational activity. During the nesting season, by contrast, the falcons will vigorously defend eggs or hatchlings, their investment, with continuous and unremitting alarm calls and diving attacks.

As a general matter, the peregrine falcon is not a particularly vulnerable species. It has two primary avian predators, great homed owls, which hunt by night, and golden eagles, which hunt

by day. Small mammals such as raccoons and rats, and some birds, particularly ravens, may take eggs or nestlings from the eyrie. Predation by owls is not an issue here, since legitimate recreation does not take place at night. It is possible that recreation would cause the peregrines at Summit to perch in locations where they are more susceptible to predation by golden eagles, but without a banding and monitoring program to identify the birds, this cannot be determined. Given the healthy growth rate of the regional population, there appears to be no reason to believe that peregrines are unduly subject to predation by golden eagles.

The peregrine falcon is not "precious" or fragile in any sense, and they were not thought to be until they were listed as an endangered species. It should be remembered that they were listed because of their susceptibility to pesticides, not because of their sensitivity to hunting, predation, human disturbance, habitat loss, disease, or any of the usual reasons for species to be listed. And despite the fact that the peregrine is fully recovered, many people continue to think of it as endangered. As a scientist, I'm least concerned with individuals; I'm concerned with species. The value of the individual is the emotional value to humans, which is a very different matter. Without a banding and monitoring program, it is not known if the falcons at this cliff, regarded as the same year to year individuals, truly are, or if what you're seeing is just a succession of members of the species. Some researchers have been able to identify individual falcons year to year based on peculiar marking or distinctive behavior, but this was not mentioned in regard to the falcons at Summit Rock.

At a site like Summit Rock where abundant trees provide locations for perching during the day, the birds have no use for the nesting site per se during the non-breeding season. At night, because the nesting site is in a recess in the rock, it may provide better protection from predation by great horned owls than perching in a tree. But this would not affect daytime recreational access.

2. Since the falcons reside at the cliff year-round, closure during the breeding season only will not reduce disturbance. A year-round closure is required.

Response. There are no data to support the concern that normal recreational disturbance during the non-breeding season will cause resident peregrines to experience disturbance of a significantly different type or of greater severity than that experienced by many other species exposed to recreational activities like hiking and rock climbing. The year-round closure has no biological foundation.

3. Calls given by falcons when they see something at the nesting cliff, even in the nonbreeding season, are cause enough to close the site to human use.

Response. Calls may be given even as someone or something is within some 100 yards or so of the cliff and the call might have several meanings, such as, to alert a mate, to indicate that the territory is taken, defense against the intruder, etc. One must be careful in putting meaning to the call. Typically, during the non-breeding season, peregrines will make a call or series of calls for a short period and then fly to a nearby location and observe the activity without exhibiting any further signs of distress. It is rare for the calls to last more than a few seconds. Calls of this brief duration are routine and should not serve as the basis for management actions.

4. Disturbance causes significant psychological and metabolic stress.

Response. This is pure supposition, and I am not aware of any data to support it. How does one measure stress, which surely does occur, and more importantly how does one determine if it is significant? I do not see how anyone can determine this without laboratory experimentation, and by the time the experimental animal is in the laboratory, it has experienced sufficient stress so that it is impossible to get a true baseline level against which to measure the stress of the disturbance. Stress certainly does occur but its significance is elusive. There is just no way to measure stress or the impact of disturbance on peregrines or know whether it might be

significant in their lives. The only certain response for purposes of managing human disturbance is the behavior of the birds, as discussed above.

5. Disturbance could cause the falcons to abandon the site or alternatively could harm the falcon.

Response. I can think of no literature documenting resident pairs abandoning nesting territories during the post-breeding season, say about a month after the young have fledged, on account of recreational disturbance. Nor have I ever seen anything like this. In fact, it is common for resident breeding pairs to defend nest sites from the large number of migrant falcons which appear in winter. It is also not unusual for even good nesting sites to experience some turnover of breeders occupying the eyrie. Often, females will move between eyries every few years, and while males tend to be more loyal to a particular site, they may also move. There is a rather large body of literature on the movement of falcons from one nesting site to another.

Some falcons may move on an annual basis while others may remain for their life spans. By contrast, it is clear from other studies that falcons are particularly sensitive to disturbance (human) and nest site abandonment at the time they are courting and selecting a nesting ledge, slightly less so during the egg laying period, less so during incubation, and I cannot think of any legitimate record of falcons abandoning young during brood raising for anything other than natural cases (eg. loss of food resources that may happen to falcons feeding on sea birds). There are no records, so far as I know, of pairs abandoning young because of human disturbance. There is a small chance that eggs may be abandoned during incubation, more so during early incubation, but a high probably that pairs may abandon a nesting ledge if disturbed during ledge or nesting "scrape" selection and late courtship.

"Harm" is a defined term contained in the definition of "take" under the federal Endangered Species Act, and I do not believe it makes any sense to introduce it into this discussion, since the sort of disturbance we are talking about does not rise to this level of significance or concern.

6. Exposure to predation at this site is increased because of human disturbance.

Response. This is difficult to put a cause and effect relationship to, and there are too many nuances that must be considered on a case by case basis. Night roosting in dense forests could result in depredation by great-homed owls, but that would not be a normal consequence of daytime recreation. Golden eagles are a prime daytime avian predator but then the circumstances of where the falcon is, what it is doing and other things govern the probability of exposure to predation by eagles. As explained above, without data from a banding and monitoring program, one cannot know if there is any predation, let alone whether it is significant.

7. Peregrines have limited ability to adapt to disturbances.

Response. To the contrary, peregrines have a great ability to adapt. This is determined, in part, by what is called the imprinting process during some stage in the breeding cycle (see # 5 above). Post-breeding peregrines can be very adaptable to disturbance. This adaptability is witnessed by the great array of nesting situations they occupy presently, including nest sites on building window sills, where the birds are within a few feet of people. There are probably over 100 major cities in the U.S. and Canada that have breeding populations. Los Angeles has about 6-7 pairs at my last understanding. This adaptability may be in part a function of the release of peregrines during the reintroduction process, during which whole populations became accustomed to human intrusion and disturbance. The result is a vast and growing population that exists today, in which each generation of young learns (through imprinting) to tolerate successively higher levels of disturbance from its parents. A good deal of variability and adaptability has been introduced simply as a function of this process.

I could recount scores of anecdotes about the birds' adaptability to disturbance. As I mentioned in our meeting, I have ridden in helicopters hundreds of times to within 50 feet of peregrine

ests, even while females were incubating, with the falcons showing no signs of disturbance. I have also seen injured adult falcons brought in from the wild that were kept in a cage and would allow people to approach within 10 feet of them, as long as the people were outside the cage which measured some 10 feet by 20 feet, while exhibiting no signs of alarm or distress. This observation is published. I have seen peregrines hunting bats during crepuscular periods over the bustling streets of Porto Alegre, Brazil (a city of several million people), only 30-40 feet above the sweeping sidewalks lined with people. These are wintering falcons from the unspoiled, unpeopled, wilderness of Arctic North America. I have heard of peregrines in Australia eagerly greeting the arrival of climbers who periodically brought them pigeons for food. And I have seen peregrines follow a car down a dirt road to catch birds flushed by the car.

In the Aleutian Islands I have witnessed a peregrine learn to use our helicopter as cover, as we slowly precede across a lake while surveying ducks, and awaiting the ducks on the lake to reach the lake shore and be flushed. At that time the falcon turned on the speed, left the cover of the helicopter, and pursued the ducks. Professor Tom Cade has seen peregrines nesting in the face of a quarry in Britain that was being used as a landfill. Throughout the day, trucks backed up to the edge of the quarry and dumped trash over the side, right past the entrance to the nest site. The falcons were so accustomed to it they took no notice. Apparently when adults tolerate disturbances, their young "learn" from them that the presence of the disturbance is not threatening.

In Arctic Alaska, on the Colville River, I have witnessed pairs of nesting falcons become adapted to paleontologists that came daily to the cliffs to pound on rocks, even to working within 100 feet of the eyries. However, when we stopped our boat at the edge of the river over 400 feet from the falcons they took to the air and began to scream at us. We were "newcomers" and not a part of their environment. This adjustment apparently happens at urban nest sites, where falcons become accustomed to humans. This is true of most animals. In the Galapagos, for instance, most animals don't have a threat response to humans (there are no peregrines there). Another example: in the 1920's and 30's, the Fish and Wildlife Service introduced the arctic fox on the Aleutian Islands for the Aleuts to hunt for the fur trade. Not surprisingly, the foxes developed a fear of hunters. On Agattu, one of the islands, foxes were hunted during the 1970s in an attempt to restore the habitat to original conditions and restore nesting seabirds that were eliminated by foxes. Foxes would yelp and run when they saw a person half a mile away. But on the Island of Kiska, where there were no people after the Japanese left during World War II and there was no hunting, the foxes would come right up to a person. I could go on ...

Now let me address a number of concerns about the site that have been raised by agency staff or other stakeholders.

8. The small size of the site makes disturbance more threatening to the falcons.

Response. It might make disturbance more frequent, due to easier access, but it would not be more threatening. Falcons would be disturbed more easily if one were closer to the nesting site, which would be the case at a small site, but it cannot be demonstrated that the disturbance is more significant or more threatening. Threatening is a word that has human connotations and would be very difficult to measure and demonstrate.

It's important to understand that birds don't defend a nesting site; they defend the contents--the eggs or young, and/or incubating female. During breeding season one should expect falcons to spend more time attacking a person, and the intensity would be greater at a small site where a person first appeared closer to them than you would at a large site. As one gets closer to the nest, the falcons gets bolder in its attacks, so the initial response at a small site would already be more intense than at a big site.

9. The small size of the site requires a more protective management strategy during the non-nesting period than large sites in national parks.

Response. Not true. During the non-nesting season, the size of the nesting site is irrelevant. Birds may still call because they have become accustomed to defending their nest site, but it's simply an innate response, and the disturbance doesn't have any biological significance.

10. Because of the small size of the site, the entire rock must be closed; lateral or vertical partial closures would not be sufficiently protective.

Response. I don't subscribe to this for the reasons stated above.

11. The natural character of the site enhances the biology of the birds.

Response. I understand that people like to see falcons at natural sites, but the question is whether one wants peregrines in the environment or wants them at particular locations? If one wants peregrines, it's irrelevant where they nest. In Utah, people want to cut down the artificial nesting towers where peregrines have nested since the reintroduction period to force them to nest on cliffs. There is absolutely no data to support the proposition that cliff nesting sites are better for falcons. In fact, in the upper Midwest, falcons had better reproduction at man-made sites than at natural sites.

Summary and Conclusion:

I understand that people have emotional responses to animals and attach human values to them that have no bases in biology. That's what makes us human. The listing of the peregrine falcon caused many people to attribute sensitivities to the bird that it doesn't possess, and to develop an over-protective response to the falcon. Some people are astonished and feel betrayed when the peregrine turns into a pest. Pigeon fanciers in the greater Los Angeles area know more about where falcons nest than many researchers do, because the pigeon raisers kill nestling falcons. In Washington State, peregrines routinely harass and hunt snowy plovers, an endangered shore bird. It is said that peregrines are currently so numerous that foraging shorebirds are not able to accumulate the fat reserves needed to continue migration. The fact seems to be that people have just happened to see falcons flush resting shorebirds and then many unwarranted conclusions are drawn. In marshes of New Jersey where peregrines were introduced during the 1970s reintroduction period, bird watchers thought it was wonderful to see them. Now, there is a move to cut down the nesting towers because it is said that the presence of the falcons threatens other bird life. The very human need to be protective of other animals, particularly those with "charismatic" attributes like the peregrine, one of the world's fastest birds, is the only reason I can see for the year-round closure at Summit Rock. From a biological standpoint, there is no support for protecting the site from human disturbance after the young have fledged and a sufficient period of time has passed to ensure that the adults have not entered another breeding cycle.

Sincerely yours,
Clayton White, PhD

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Rock climbers have a long history of contributing their expertise to the research, conservation and management of many species, including the peregrine falcon, golden eagle, birds and mammals living in the rainforest canopy, bighorn sheep, and highly endangered California condor and recently rediscovered Lord Howe Island stick insect. In each of these cases, climbers provided critical skills, including scientific expertise, that have made important contributions to conservation. It is our hope that the Willamette National Forest will continue this traditional in the spirit of cooperative conservation efforts.

The Access Fund and local climbing community care for the wildlife that share the climbing environment. Protecting nesting raptors is extremely important and climbers regularly volunteer their time to help properly manage cliff nesting raptors. At the Menagerie, the proposed seasonal closure period (January 15th through July 31st) is reasonable, but should be subject to opening earlier depending the success or failure of the nest. Further, the size of the buffer zone can be reduced to the rock formations with an active nest and the areas surrounding the base of the formation (including all climbing routes, outcroppings, cliffs, faces, ascent and descent routes and climber's access trails to the formation). Such closures our used effectively across the country, they are proven to protect nesting peregrines, allow for better monitoring, and minimizes access restrictions.

Thank you for considering our comments. Our group has the experience, local contacts, and resources to assist planners craft alternatives that protect peregrines and limit access restrictions. We look forward to participating throughout the entire planning process. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303-545-6772 x105) or email (ty@accessfund.org) to discuss this matter further.

Best Regards,

Ty Tyler
Stewardship Manger
Access Fund

cc: Brady Robinson, Executive Director, Access Fund
Adam Baylor, Mazamas and Access Fund
Eddie Espinosa, American Alpine Club
Greg Orton, Regional Coordinator, Access Fund

ⁱ Climbingmanagement.org is a collaboration between the Access Fund, BLM, NPS and the USFS and is intended for any public land manager or planner who manages climbing. At the end of the 2010 National Climbing Management Summit hosted by the Access Fund, participants discussed ways to continue the dialog, share best practices and stay in touch. To that end, this site contains sample documents, contact information of experts across the country, existing planning documents, research and other valuable resources related to climbing management. It also contains the presentations from the 2010 and 2007 National Climbing Management Summits. *See* <http://www.climbingmanagement.org/>

ⁱⁱ The local climbing community can provide volunteers for monitoring and can educate climbers about the new management policies that will result from this planning process.

ⁱⁱⁱ <http://status.accessfund.org/>

^{iv} *See* www.climbingmanagement.org

^v The Access Fund sponsors approximately 130 Adopt a Crag events annually across the country. Adopt a Crag is the Access Fund's signature stewardship program. It exists to unite local climbing communities in partnerships with land managers to conserve local climbing areas. Adopt-a-Crag events typically include activities such as litter clean-ups, trail construction and restoration, erosion control, and invasive weed removal. *See* <http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000889/k.166C/AdoptaCrag.htm>

^{vi} In July 2011, the Access Fund launched a new Conservation Team that will spend ten (10) months a year traveling the country addressing conservation issues. *See*

<http://www.accessfund.org/site/apps/nlnet/content2.aspx?c=tmL5KhNWLrH&b=5000939&ct=11053041>

^{vii} *Examples include:* Luther Rock, Lake Tahoe, CA; Pinnacles National Monument, CA; Eldorado Canyon State Park, CO, Jefferson County Open Space, CO; Acker Rock, OR.

^{viii} <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/AF%20NPS%20MOU.pdf>

^{ix} <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/AF%20BLM%20MOU.pdf>

^x <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/2009%20USFS%20MOU.pdf>

^{xi} <http://www.nps.gov/yose/planyourvisit/climbingclosures.htm>

^{xii} “Each year, from approximately March 1 through July 31, Rocky Mountain National Park initiates temporary closures in certain areas of the park to ensure birds of prey (raptors) will be undisturbed during their breeding and nesting seasons. Closure notices will also be posted at key access points in the park. As breeding and nesting data are collected, additional closures may be necessary, or closures may be lifted. When closed, the closures include the named rock formations and the areas surrounding the base of the formation. This includes all climbing routes, outcroppings, cliffs, faces, ascent and descent routes and climber's access trails to the formation.” *See*

http://www.nps.gov/romo/planyourvisit/area_closures.htm#CP_JUMP_435739

^{xiii} “Seasonal area closures protect nesting birds of prey from February 1 through approximately July 31 each year. The length of this closure varies each year and may be partially lifted earlier than July depending upon conditions. When in effect, signs are posted in closure areas (UFC-01-12 and Exhibit G for information on this area closure). Contact Boulder Ranger District at 303-541-2500 for current status.” *See*

<http://www.fs.usda.gov/recarea/arp/recarea/?recid=40354>