

Delaware Canal State Park Complex
11 Lodi Hill Rd,
Upper Black Eddy, PA 18972

January 22, 2023

Dear Assistant Manager Pecora and Manager Heath:

The Eastern Pennsylvania Alliance of Climbers (EPAC) and Access Fund as representatives of the climbing community kindly request that the annual raptor closure at Nockamixon Cliffs (aka The Narrows) be reevaluated. The closure has been in place, with all original parameters, since 2016. Initial discussions with DCNR and Pennsylvania Game Commission indicated that any adjustment to the closure would only be considered once the peregrines were delisted in the state of Pennsylvania. Through the extraordinary efforts of the PGC and its partners, the population met all its growth metrics as outlined in the Peregrine Management Plan and were delisted in September of 2021.

Climbers have a long history of working with wildlife biologists in their efforts to re-establish viable populations of peregrine falcons in the United States. Through the lending of technical rope skills and sharing knowledge of the vertical environment, climbers assisted with early efforts to survey, band, and place peregrine falcons at nest sites. As peregrine populations began to rebound over the years, climbers continued this partnership, assisting land managers with nest site monitoring, which has continued to the present day.

As the science and understanding of peregrine falcon breeding and behavior has evolved, climbers have worked with land managers to implement and communicate seasonal closures aimed at limiting human impacts that could compromise annual breeding success. As we prepare for the 2023 breeding season the collaborative spirit between land managers and climbers remains strong across the United States. This is exemplified by efforts undertaken by local climbing organizations and the Access Fund to communicate annual closures to the broader climbing community, and the development of management resources such as the Access Fund's Climbing and Raptor Management Handbook. This resource was developed through a collaboration with raptor researchers and the Access Fund, and has received positive feedback from land management professionals since its release. Based upon the success of collaborative raptor management efforts at popular climbing areas, and EPAC's

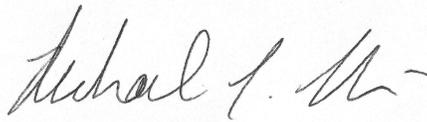
understanding of raptor behavior at the Narrows as well as the topography of the area, we are eager to work with you to assess the potential for implementing a viewshed management plan at the site. Doing so will prevent human caused disturbance of nesting peregrines, while affording access to select ice climbing routes during the winter climbing season. The following pages outline a proposal and resources for starting this process.

Your consideration on this matter is greatly appreciated. Please feel free to share this information both within and outside the DCNR system as appropriate. For questions, clarification or further discussion, please contact at dana@epaclimbers.org and mike@accessfund.org or 267-210-1108

Kind Regards,



Dana Caracciolo
Board Member
Eastern PA Alliance of Climbers
epaclimbers.org



Mike Morin
Northeast Regional Director
Access Fund
accessfund.org



Nockamixon Cliffs Closure Reevaluation Proposal

Closure History

Nockamixon Cliffs, known to climbers as “The Narrows”, is an iconic ice climbing destination in the Mid-Atlantic region. Though designated a Natural Area, due to the presence of a rare alpine plant species, ice climbing is a permitted activity under an agreement that was made 25+ years ago. The rationale for allowing ice climbing to take place is two-fold. First, once the cliffs become enshrouded in ice the habitat and dormant plant are protected from impact. The act of hiking, rock climbing and dry-tooling are not permitted because this protection is lost without the ice in place. Second, once the climbers have left and the ice has melted there is very little, if any, evidence of human impact on the area.

In January of 2016, DCNR notified climbers that cliffs would be closed February 1 to protect a nesting raptor. Given the immediacy of the closure, there was little time to assess information surrounding the closure. However, DCNR was able to slightly shrink the closure area to give climbers access to areas on the extreme ends of the cliffs. DCNR and climbers worked together to notify the community, put up signage and ensure compliance. Discussions persisted throughout the year culminating in a meeting in December of 2016 with representatives from DCNR, PGC, Access Fund, and the climbing community. Art McMorris presented information about the closure as well as the state Peregrine Management Plan. Erik Murdock, Access Fund Director of Policy, presented a viewshed analysis and supporting information from climbing areas throughout the country. It was determined that because the pair was new and only 1 of 4 cliff nesting pairs at the time, the best course of action for the pairs success was to leave the closure in place as originally designed. The benchmark presented at the meeting to reevaluate the closure was the species being delisted and/or a new management plan put in place.

Climbers have fully complied with the closure every year since. Each January DCNR and climbers work together to make a formal closure announcement. Local climbers, and more recently EPAC, have worked to educate climbers about the closure with information on websites, social media and community meetings. When the peregrines were delisted in September of 2021 the question regarding its impact on the closure was asked. Dialogue began with DCNR and PGC in January of 2023 about what opportunities may exist to reevaluate the closure’s parameters.



Proposal

EPAC and Access Fund are not seeking to fully remove the closure. As conservationists, we fully believe in protecting any and all species that we may impact with our activity. Our goal is to use the most recent, best available science on protecting raptors at climbing areas accompanied by the guidelines of PGC to assist with a fully informed decision regarding the closure area. The purpose of this proposal is to identify potential steps in the process of reevaluating and managing the closure in the future.

1. **Determine appropriate beginning date of closure:** The closure at Nockamixon Cliffs begins February 1 while other closures, similar in nature, begin February 15. We seek to understand the rationale for the date adjustment.
2. **Conduct an updated site visit and viewshed analysis:** Viewshed closures are well documented tools for managing human caused disturbances to cliff nesting raptors at climbing areas. Viewshed is also considered by PGC in regards to nests on buildings, bridges, etc. We wish to update the viewshed analysis with current mapping and within the considerations of PGC parameters.
3. **Evaluate the Closure:** Based on the viewshed analysis assess whether the current closure can be adjusted to allow more access to the cliffs.
4. **Monitor the effects on the nest site:** Put a program in place to collect data on the behavior and annual success rate of the nesting pair. If this falls outside the scope and/or ability of DCNR or PGC staff/volunteers, EPAC will secure funding for a monitoring program.
5. **Review observations and closure details annually with DCNR and PGC:** Ongoing communication and assessment is needed to insure the pairs continued success. Together, decisions will be made to adjust the closure as needed based on data collected through monitoring.



Resources

We are providing the following resources as a tool for assisting DCNR and PGC with this proposal and reevaluation process.

Access Fund Climbing and Raptor Management Handbook

<https://www.accessfund.org/open-gate-blog/access-fund-releases-comprehensive-climbing-raptor-management-handbook>

Contacts

The following individuals are currently working with climbers on raptor management plans and policies. They can provide valuable information from a land manager or wildlife professionals perspective.

- Dr. Erynn Call, State Raptor Specialist, Maine Inland Fisheries and Wildlife
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- Chris Martin, Conservation Biologist, New Hampshire Audubon cmartin@nhaudubon.org
- Chris Kelly, Biologist, North Carolina Wildlife Resource Commission
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- Sergio Harding, Nongame Bird Conservation Biologist, Virginia Department of Wildlife Resources, Sergio.Harding@dwr.virginia.gov
- Austin Bradley, Breaks Interstate Park Manager, abradley@breakspark.com

