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## **Formal Statement of Complaint**

The Allied Climbers of San Diego feel it is inappropriate for the Cleveland National Forest to deny well established recreational climbing in order to create seasonal raptor nesting habitat preserves where no such preserves previously existed, when golden eagles are not nesting in close proximity or within the viewshed of our activities, and when prairie falcons nesting nearby continue to do so successfully.

### ***ACSD's three Points of Contention***

**1)** Eagles are not nesting on the cliff faces of Corte Madera and Eagle Peak where climbing takes place, yet the Cleveland National Forest (CNF) has continued to mislead the public to believe this is the case with their generalized representation of these cliffs as nesting locations in their closure proposals.

*\* As users of these areas, we know golden eagles are not nesting on the cliff faces we climb, and that there are no golden eagles' nests within the viewshed of our activities. In fact, Jeff Wells, Senior CNF Biologist responsible for the proposals, stated during a recent CNF open house forum that no eagles are nesting at Corte Madera and Eagle Peak, but that under this closure he hopes they will in the future.*

**2)** The CNF closure proposals are for blanket coverage of entire cliff areas rather than acceptable closures for individually identified active golden eagle nests. Though ACSD has requested the CNF to do so, they have not yet provided any helpful information as to where supposed nests actually exist.

*\* Climbers respect and avoid active nests near climbing areas. If the CNF would simply identify the supposed golden eagle nests (climbers are aware of none within the viewshed of the cliffs we climb), through joint monitoring by the CNF, the Wildlife Research Institute (WRI), and trained representatives of the climbing community, climbers would be more than willing to respect and help enforce appropriate buffer zones of non-recreation per USFWS BGEPA guidelines for each eagle nest as it becomes active.*

**3)** The CNF continues to circumvent the US Forest Service Land Management Plan (LMP), adopted in 2005, by not completing clearly identified necessary steps required BEFORE closing Public Lands.

*\* Part III, Appendix D of the LMP clearly states, in the event the CNF perceives a conflict between uses and resources, that management actions are to be implemented in the following order: 1) Education 2) Perimeter Control 3) Management Presence 4) Direct Action (i.e. closures). Steps 1-3 have not been attempted. The LMP does allow the CNF to bypass steps 1-3, but only if "analysis clearly indicates the need for immediate action". This analysis does not exist. Current GE and PF population levels and trends, and their non-threatened or endangered status, clearly suggests that immediate action is not necessary. The CNF should follow their Land Management Plan (steps 1-3) before proposing closures.*