May 15, 2023

Jenna Marmon, Planning and Design Lead
Oregon Parks and Recreation Department
725 Summer St NE, Suite C
Salem, OR 97301

Dear Members of the Planning Team,

Access Fund appreciates the opportunity to provide input on the DRAFT Smith Rock Master Plan. Access Fund and the climbing community recognize the need for these plans as visitation at Smith has exponentially increased in recent years. As one of the most popular and cherished state parks in Oregon, an updated Master Plan creates a unique, forward-thinking opportunity to improve both the visitor experience and protect the site’s natural and recreational resources. While many of our comments address various issues and concerns, we see this process as a positive step in the right direction. Access Fund supports the protection of the resources that make Smith Rock a unique and special place including water quality, wildlife habitat, intact plant communities, and a rich human history. In addition, Access Fund values the geologic features that have made Smith Rock a world-class climbing area.

Access Fund
Access Fund is a national advocacy organization and accredited land trust that leads and inspires the climbing community toward sustainable access and conservation of the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. For more information about the Access Fund, visit www.accessfund.org.

Comments

Permits, Reservations, Quotes and Fees
The DRAFT Master Plan briefly outlines a concept to develop an online reservation and permitting system. Currently it is unclear if this would be mandatory for day use in addition to large group events and commercial activities. The DRAFT also mentions an increased fee at the Bivouac campground. Finally there is consideration of implementing a reservation and quota system for other facilities throughout the park, including areas suitable for group uses. We
request that Smith Rock work closely with its stakeholders to develop a plan that does not add administrative burden to the general public or inhibit access to Smith Rock.

From our conversations with the climbing community and data from a survey conducted by Access Fund specific to permits, fees and quotas, the consensus is, climbers are deterred from visiting a location if the climbing area requires a fee, permit, quota, or some combination of the three.

- 55% of climbers would be deterred from climbing at a specific location if both a fee and a quota was required.
- 45% of climbers would be deterred from climbing at a specific location if a fee was required.
- 32% deterred from climbing at a specific location if a permit was required.

**Permits**
The process of acquiring a permit should be streamlined to reduce administrative burden on the public. Smith Rock should also offer an onsite, in person option to acquire a permit and not wholly rely on an online permit system.

**Reservations and Quotas**
We define reservations as advanced permission to visit during specific times or dates. Quotas refer to limits on visitation. Overwhelming feedback from the climbing community indicates that climbers are extremely opposed to a reservation or quota systems in most cases. A recent national survey conducted by Access Fund reported that 44% of climbers would be deterred from climbing at a specific location if a reservation or quota was implemented. If Smith Rock deems it may be necessary to implement reservations or quotas for specific areas or general admission, we request an additional public process be held to include the climbing community in the determination.

One of the predominant concerns for Access Fund and the climbing community is overcrowding in the park. Crowding impacts the park’s resources and the user experience. Specifically, the lack of available parking, increased use of trails, and bottlenecks at certain trail junctures are of the highest concern. Crowding at climbing areas is also a factor, especially on moderate and classic routes that attract a wider range of climbers, groups, and skill levels. However, climbers seeking less crowds have self-dispersed more and more each year and, when well-thought out, some recent route development has also encouraged greater dispersion. We believe overcrowding can be remedied by dispersing users and providing opportunities appropriate for people with various abilities and interests.
Fees and Equity Considerations
The DRAFT Master Plan mentions the possibility of additional fees to enter Smith Rock. We encourage the planning staff to explore how any additional fees may impact low-income populations' ability to climb and visit Smith Rock. A new fee outside of a parking fee could discourage some people from visiting Smith Rock. A displacement study should be conducted to better understand the correlation between fees and how this might impact and/or displace low-income and otherwise marginalized populations. We understand that fees can be necessary to protect the lands we all love, and that fees are often necessary for the continued management of specific public lands. With that said, if Smith Rock intends to fully consider the justice, equity, diversity, and inclusion ramifications of the fee increases proposed, Smith Rock must also have a plan to deal with the negative impacts of the increase on marginalized communities.

Climbing Management Guide
Access Fund supports Smith Rock State Park’s plan for developing a Climbing Management Guide to be developed and adopted for the area. Access Fund requests that the climbing community be integrally involved in the development of this plan. As climbing grows in popularity and as current climbing infrastructure, including bolts and anchors, weathers and ages, it is necessary to replace this gear. Having a plan and policies in place for how this is accomplished would reduce risk and aid in making climbing routes at Smith sustainable. Additionally, new route development has been taking place in the area. Guidelines and policies for establishing new routes could help to maintain the quality and character of Smith as a mature climbing destination, while also ensuring the protection of valuable natural and cultural resources. Finding the right balance between rules and guidelines is critical to ensuring that climbers have the necessary flexibility and freedom to climb, replace anchors, and develop routes, while ensuring current and future compatibility with fellow recreational users, natural resources, and wildlife that share this remarkable area.¹

We also support the addition of a Climbing Ranger position. We also encourage Smith Rock to explore the idea of implementing a climber steward and education program. Access Fund has successfully started climbing steward programs in other popular climbing destinations.² We would like to work with Smith Rock on starting a similar program at the park.

Raptor Closures
Access Fund published a handbook on raptor management.³ The handbook is the result of years of effort to compile every relevant article related to managing recreation, specifically climbing, in raptor habitat, and it includes a 20 page reference list in Appendix A (a living document that is

¹ For initial research into climbing management planning, visit www.climbingmanagement.org
² https://www.accessfund.org/capabilities/stewardship-conservation
linked to the handbook). The handbook was reviewed and edited by Hawkwatch, UFWS, and NC Wildlife Resources Commission. It represents the latest knowledge base and standards for protecting raptors. We suggest that Smith Rock utilize the most current, science-based models for protecting nesting raptors. We appreciate the collaboration and effort Smith Rock has put into managing seasonal raptor closures. We encourage and support Smith Rock continuing to collaborate with the climbing community on these closures.

**Addition of Bridges and Extension of the Rim Trail**
Access Fund recommends prioritizing the addition of a bridge at Southern Point as well as the extension of the Rim Trail ahead of other major capital investments such as the Welcome Center. Adding the bridge and extending the Rim Trail provides easier, more desirable loop options for hikers which would dramatically help disperse people and decrease use of the Chute Trail and Misery Ridge. The additional bridge would also provide more convenient access to many climbing areas. We foresee these additions to current park infrastructure as the most effective way to disperse users and provide unique, high-quality experiences for people with varying abilities.

**Trails Standards**
Access Fund suggests further clarification be added to trail standards to differentiate between hiking trails and climbing access trails. General hiking trails require different standards than climbing trails. Access Fund has been supporting this annual Adopt a Crag event for decades and, in more recent years, has provided professional trail crews through the Access Fund Conservation Team program. As new trails are added in the park, maintenance of both the current and expanded trail system would need to be addressed. Trail work requires a skilled and knowledgeable workforce and Access Fund can extend support through grant funding4 and the Conservation Team to Smith Rock State Park. It is currently unclear if and how the Park will prioritize this for their paid staff and stewardship partners, or how the trails would be maintained.

4 For grant opportunities, visit [www.accessfund.org/grants](http://www.accessfund.org/grants)
Thank you again for the opportunity to be involved in planning for the future of Smith Rock State Park. The climbing community has a special love for the park, as many others do. With foresight and proper planning, we hope Smith continues to be both well-loved and well-steward ed for future generations of visitors. Please do not hesitate to contact me with any questions at katie@accessfund.org.

Sincerely,

Katie Goodwin
Access Fund, Policy Analyst