

Kenai Fjords National Park
Commercial Use Authorization Activity-Specific Stipulations
Attachment ____
2015 GUIDED MOUNTAINEERING

1. Annual Reports and Documentation

Pre-Season:

The commercial use authorization (CUA) holder will submit the following reports and documentation:

- a) Schedule of climbs and proposed rate schedule.
 - Due prior to advertisement.
- b) Business brochures and advertising.
 - Due prior to distribution.
- c) Employee roster of staff operating within the park.
 - List of employees, with documentation demonstrating that they meet the same standards and requirements as the CUA holder.
 - "Guide Roster" shall include certifications of individual guides.
 - Due 30 days prior to operations.
 - Updates should be sent in to the KEFJ Chief Ranger's office and Concession's Management specialist in the Alaska Regional Office upon hiring of additional staff.

Post-Season:

The CUA holder will submit the following reports and documentation:

Activity Reports – Park Specific Guidelines

- a) Any CUA holder conducting a guided overnight trip anywhere in the park is required to submit an Annual Activity Summary report.
- b) For each overnight trip on the Harding Icefield, the trip leader must fill out a post trip report form and mark the group's route and campsites on a topographic map – a reproduction map is acceptable. These trip report forms must be submitted with the Activity Report forms at the end of the season.
- c) Any CUA holder conducting guided ice hiking or climbing on Exit Glacier or guided hiking on the Harding Icefield Trail must record a Day Use Activity Summary of their activity. This activity report is available on the Kenai Fjords National Park website: <http://www.nps.gov/kefj/learn/management/upload/Day%20Use%20Summary.pdf>. The report must include daily use for each month, including number of guides, number of clients, the name of the guide(s) and Comments/Observations. This summary must be turned in to the Park by September 15th. The mailing address is PO Box 1727, Seward, AK 99664.
- d) The **Annual Report form** 10-660 is required to be completed submitted by all operators by November 15.

Note: These documents are in addition to other documentation requirements of the CUA program found elsewhere, such as application documents, proof of insurance, Activity Reports, and Annual Report.

2. Suspension, Restriction, Revocation, and Denial Policy

This CUA may be suspended, restricted or revoked in accordance with the NPS Alaska Regional Policy Number 700-001. A violation is defined as:

- a) Entering a plea of guilty or no contest or being found guilty of violating a state or federal law or regulation where a link exists between the offense and the business activity authorized by the Authorization regardless of whether the violation occurred in a unit of the National Park System;
- b) Failure to comply with state or federal law or regulation where a link exists between the offense and the business activity authorized by the Authorization regardless of whether the violation occurred in a unit of the National Park System and regardless of whether a court enters a finding of guilt;
- c) Violation of 18 U.S.C. 1001, providing false information to any agency or department of the United States;
- d) Failure to comply with a federal or state health or safety code or regulation when conducting activities authorized by the CUA;
- e) Failure to comply with the provisions and conditions of the CUA.

Before the Trip

1. Employee Briefings and Orientations

The CUA holder will provide employee orientation and training on park regulations, requirements, and policies. The CUA holder is responsible for all actions of their employees while conducting business under the CUA. Upon NPS request, the CUA holder will provide written documentation of training and orientation.

2. Approved Air Taxis

All trips that will use an aircraft for transportation into and out of the park will hire air taxis that currently hold a CUA for such activities with Kenai Fjords National Park. Please consult the Kenai Fjords Chief Ranger for a current list of permitted air taxis.

3. Registration with the National Park Service

- a) Any CUA holder accessing Exit Glacier from the Harding Icefield trail must use an access route identified by Kenai Fjords National Park. Each CUA holder must schedule a pre-season field meeting with Park staff to confirm the access to Exit Glacier and strategies to minimize their impacts on vegetation while accessing Exit Glacier. CUA holder must notify Park staff when snow conditions necessitate changes in access. Any deviation from the designated access route must be approved by the KEFJ Chief Ranger prior to use. The contact numbers for scheduling the pre-season meeting are (907) 422-0500 or (907) 422-0520.
- b) All CUA trips are required to check in at the Exit Glacier Nature Center in person if the trip is on Exit Glacier and provide the number of guides and clients. All CUA trips for Exit Glacier will also sign in at the registry for the Harding Icefield trailhead.
- c) All CUA trips operating in areas within Kenai Fjords National Park other than at Exit Glacier will check in with the Chief Ranger or designee prior to departure.

4. Equipment

- a) Minimum equipment requirements for each client should consist of crampons, harness, trekking poles, and helmet. Equipment must conform with industry acceptable standards and be in good working order.
- b) Minimum emergency equipment to be carried by each guide must be sufficient to initiate evacuation and stabilization.

During The Trip

1. Visitor Safety

The CUA holder will conduct all activities with safety as their highest priority.

2. Leave No Trace Requirements and NPS Waste Management Policies

Guides are responsible for ensuring that all members of the trip follow Leave No Trace (LNT) guidelines and adhere to all regulations and policies for waste management and sanitation, backcountry travel, and camping.

3. Sanitation and Human Waste

All solid human waste from participants of activities authorized under this CUA will be managed in accordance with current NPS Regulations found in Title 36 of the Code of Federal Regulations and in Superintendent's Compendium:

- Coastal Public Use cabins and beaches – Restop II, PETT Wag Bags, or similar containers must be used and carried out for disposal in a landfill.
- Exit Glacier Developed Area – When the ground is frozen and NPS facilities are not available, human waste will be disposed of in Restop II, PETT Wag Bag, or similar containers and carried out for disposal in a landfill.
- Exit Glacier – Restop II, PETT Wag Bags, or similar containers must be used and carried out for disposal in a landfill.
- All other glaciated areas of the park – Human waste must be deposited in a deep crevasse or carried out in a Restop II, PETT Wag Bag, or similar container and disposed of in a landfill.

Tissue paper and sanitary items must be packed out or burned when fire hazard is low.

4. Food storage – designated areas and methods

- a) Definition: A bear resistant container (BRC) means an item constructed to prevent access by a bear. BRC's include—

- Items approved by the Department of Interior and Agriculture's Interagency Grizzly Bear Committee (Interagency Grizzly Bear Committee <http://www.igbconline.org/html/container.html>);
 - Park provided metal food lockers at some coastal campsites; and
 - Any additional items approved in writing by the Superintendent.
- b) Food, food containers, garbage, and harvested fish must be stored in a bear resistant container (BRC) or secured--
- Within a hard sided building;
 - Within lockable and hard sided section of a vehicle, vessel, or aircraft; or
 - By suspending at least 10 feet above the ground and four feet horizontally from a post, tree trunk, or other object on a wire or branch which will not support a bear's weight.
- c) This regulation does not apply--
- On the Harding Icefield when surrounded by snow or ice for at least one mile in all directions;
 - To food that is being transported, consumed, or prepared for consumption; and
 - To clean dishes and cooking equipment that is free of food odor.

5. Camping

- a) Groups camping at the Exit Glacier Campground may not occupy more than four sites per night. Sites are limited to two tents per site and six people per site.
- b) All equipment and supplies, including but not limited to tents, tarps, tools, fuel, food, and garbage must be removed from each remote campsite upon departure. Departure will be defined as leaving the site with the intent of not occupying the site overnight within the next 24 hours.

6. Trash removal

The CUA holder is responsible for removing and properly disposing of all of their trash from the park at the conclusion of each trip.

7. Caching

The CUA holder is responsible for complying with all park regulations related to property and wildlife protection. Temporary storage or "caching" of equipment or supplies must be approved in advance and in writing by the Superintendent.

8. Group Size and Trip Quantity

- a) All backcountry trips (this includes the Harding Icefield Trail, Harding Icefield, and all coastal areas of the park) are limited to a maximum group size of 14 people, including guides and assistants.
- b) Trips shall be limited to two per activity, day, and location, for each CUA holder.

9. Climber-to-Guide Ratios

- a) Climber-to-guide ratios will be appropriate for the nature of the terrain and based on the course and climbing objectives. Climber-to-guide ratios will not exceed five climbers to one guide for general ice hiking type trips and three climbers to one guide for ice climbing and any other trip requiring more advanced skills.
- b) Solo glacier travel is not permitted for clients.
- c) A client shall never be left unattended.

10. Communication

- a) Guides will carry a communication device capable of two-way communication between each group in the field. This device should be capable of contacting local emergency services and/or an in town company representative.
- b) FRS or GMARS radios are highly recommended to maintain communication between CUA holders.
- c) In most areas, satellite phones are the only reasonable option for two-way communication.

11. Glacier Travel

- a) Guides and clients shall utilize roped travel for snow covered glacier travel when the consequences of a fall could result in injury or death.
- b) Guides shall ensure adequate instruction on crampon walking/climbing technique prior to accessing the ice and additional instruction once on the ice.
- c) Unroped ski mountaineering is permissible after the lead guide has made a thorough assessment of the objective and deems it safe to do so.

12. Search and Rescue Guidelines

- a) In certain instances, guides and team members may become involved with search and rescue operations involving other teams and/or the NPS. Before engaging in search and rescue events that do not directly involve their team, guides must ensure the safety and well-being of their clients.
- b) Guides will not be paid for search and rescue operations initiated by themselves or others; they may only be compensated when work is performed at the direct request of the NPS and carried out under NPS direction. The NPS will make an acknowledgement that the guide will be compensated at the time of a request for assistance. Guides will be paid on the same scale used for emergency firefighters, otherwise known as the AD scale. All the paperwork required for payment will be completed in a timely fashion or payment will be considered to be surrendered.

13. Emergency Response and Rescue Skills

All guides shall have training in self-rescue and evacuation skills. Guides shall be able to coordinate self and team rescues, including but not limited to crevasse extrication, raising and lowering operations, evacuation of ill and injured climbers, accident site management, triage skills, basic life support as per WFR protocols, and operating in and around aircraft.

- a) Annual submission of an Emergency Action Plan is required. This plan should identify contingency resources.
- b) At all times on the trip teams will carry equipment necessary to preserve life and limb in the event of an emergency.
- c) All guides shall be familiar with NPS search and rescue procedures.
- d) Incidents involving personal injury to clients or guides must be reported to the NPS within 24 hours following completion of the climb.
- e) Any accident involving a fatality or serious injury must be reported to the NPS immediately and by the most expeditious means available.
- f) If an emergency fixed wing aircraft pickup is requested from an air taxi pilot, either the guide or the pilot shall attempt to contact the NPS to inform us of the emergency as soon as possible.
- g) Instances in which a client or guide becomes separated from the rest of the group and cannot be located shall be reported to the NPS immediately.

14. Accidents and Injuries

The CUA operator is responsible for notifying the Park of any incident that results in an injury requiring treatment. Please reference NPS emergency notifications protocol (attached to CUA) for contact numbers and procedures. The CUA holder and/or employee involved in the incident may be required to provide statement and/or reports related to NPS investigation and documentation procedures.

15. Complaints

The CUA holder will send complaints and/or negative evaluations regarding the CUA holder operations to the KEFJ Chief Ranger's Office. The NPS will require a written response in a timely manner including any proposed remedies or administrative actions.

16. Bear/Human Interaction

Any encounters with bears, including but not limited to situations where human food was obtained and / or bear spray or firearms were used, must be reported to a park employee as soon as practical. If an employee cannot be contacted in the field, the incident must be reported to park headquarters in Seward immediately when the group leaves the field. This report may be made in person, by phone, fax, or email.

17. Field Documentation

A current, signed and approved CUA must be carried by each CUA holder (or their employees) operating within the boundaries of the park. A reproduction or electronic copy on a mobile device is acceptable. This permit must be presented to any park employee upon demand.

18. Laws, Regulations, and Superintendent's Compendium

CUA holder is responsible for abiding by all applicable regulations, and should take special note of the park specific Superintendent's Compendium, which is available from park headquarters and on the park website.

19. Other activities

- a) Engaging in a commercial activity other than that specifically permitted for is prohibited.
- b) Use of snow machines for commercial activities is prohibited without the express written authorization of the Superintendent.

After the Trip

1. Check-Out Requirements

Failure to comply with the requirements outlined above may result in the revocation of the CUA and may impact the opportunity to operate commercially in Alaska units of the NPS in the future.

Application Check List

<p>The commercial use authorization (CUA) holder will submit the following reports and documentation:</p> <p style="text-align: center;">Checklist – Kenai Fjords NP Mountaineering Guides</p>	
<p>a) Schedule of climbs and proposed rate schedule.</p> <ul style="list-style-type: none">• Due prior to advertisement.	
<p>b) Business brochures and advertising.</p> <ul style="list-style-type: none">• Due prior to distribution.	
<p>c) Employee roster of staff operating within the park.</p> <ul style="list-style-type: none">• List of employees, with documentation demonstrating that they meet the same standards and requirements as the CUA holder.• “Guide Roster” shall include certifications of individual guides.• Due 30 days prior to operations.• Updates should be sent in to the KEFJ Chief Ranger’s office and Concession’s Management specialist in the Alaska Regional Office upon hiring of additional staff.	

