

National Park Service
U.S. Department of the Interior

Rocky Mountain National Park
Estes Park, Colorado



Rocky Mountain National Park

Commercial Services Strategy for Guided Climbing and Technical Mountaineering

August 22, 2014

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Consultants*



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Climbing; Rope, NPS Photo, undated.

I. Executive Summary

This document outlines the Rocky Mountain National Park's 5-year strategy for providing enhanced commercial guided climbing and technical mountaineering services to visitors. This Commercial Services Strategy for guided climbing and technical mountaineering in Rocky Mountain National Park (ROMO) was prepared in response to public comments received by the park asking for more visitor choice in commercial guided climbing services within the park. It contains information regarding park resources, values, relevant management policies, the market demand and size for guided climbing, and expected growth in the industry. Two consultants of the National Park Service Business Plan Internship program completed this analysis and public outreach process over the summer of 2014 with the guidance and input of the ROMO senior management team, the commercial services team, the Intermountain Regional Office commercial services team, and the Washington Office of the National Park Service (NPS).

Feedback from more than 20 park staff, 23 commercial operators, and many visitors, and the public was gathered throughout summer 2014. A public forum was held on July 15, 2014 with more than 40 stakeholders in attendance. A public comment form was available online for three weeks in July 2014 and 206 comments were collected. This input was incorporated to ensure this strategy represents the perspective of the park's diverse stakeholder groups. The consultants also reviewed park data regarding visitation and visitor use as well as financial reports from the current concessioner.

For more than 30 years, ROMO has operated commercial guided climbing and technical mountaineering through 10-year concession contracts to one concessioner, Colorado Mountain School (CMS). An estimated less than 1% of total climbing at ROMO results from guided climbing; the remainder comes from private, non-commercial use.

The park has determined that commercial guided climbing and technical mountaineering are a necessary and appropriate service with the park boundaries. Guided climbing and technical mountaineering enhances visitor experience by facilitating access to and enjoyment of park resources while neither diminishing the preservation of the high-elevation ecosystems and wilderness character of park nor conflicting with the park's mission to provide the freest recreational use of and access to the park's resources to its approximately 3 million visitors annually. Market research conducted for this report suggest that while climbing has grown tremendously in the last three decades and is now considered more mainstream and commercial, it is unlikely that the guided climbing market is substantially bigger than that of the current concessioner, even if there were more guided climbing businesses are allowed to operate within the park. The purpose of allowing new businesses access to the park would primarily be to offer more competition and customer choice.

Through engaging stakeholders through public meeting, an online public comment form, and interviews with climbers and climbing organizations (non-guides), it is clear that both private climbers and professional guides share the desire for the park to expand visitor choice by opening access to more than one concessioner. They also share the same concerns as park staff about protecting the wilderness and preventing overcrowding on routes. They want the park to balance private- and commercial-use, especially on intermediate and popular routes where crowding is more likely to occur. Additionally, outdoor recreation and non-profit groups advocated strongly that students and youth need access to permitting options separate from commercial providers because they are unable to pay market rates.

The consultants used the insights gained through this market analysis and stakeholder engagement to develop commercial service recommendations for the park. The first recommendation is replacement of the existing guest guiding program with limited-trip, out-of-park CUAs to allow for visitors to climb with specific guides in the park and to provide more reasonable access to educational and non-profit groups. Next, the park evaluated the following four alternatives:

- Alternative 1: One Category III Concession Contract and Limited-Trip CUAs
- Alternative 2: Six Category III Concession Contracts and Limited-Trip CUAs
- Alternative 3: Six Out-of-Park CUAs and Limited-Trip CUAs
- Alternative 4: Limited Use CUAs and Limited-Trip CUAs

The park evaluated the four alternatives based on the following key criteria:

- Alternative 4: Limited Use CUAs and Limited-Trip CUAs

The park evaluated the four alternatives based on the following key criteria:

Visitor Experience: Enhances the visitor's experience by offering choices for a safe and high quality service at a reasonable price.

Resource and Wilderness Impact: Preserves or enhances the park's wilderness character.

Stewardship: Actively incorporates the park's interpretative themes as part of its services.

Ability to Manage and Collect Data: Strategically utilizes park staff and resources to manage and improve the ability of the park to collect data about the market for guided climbing.

The park recommends Alternative 2: six category III concession contracts with limited-trip out-of-park CUAs. This model balances the priorities of various stakeholders, while minimizing the risk to the park. While visitors receive improved choice and quality of service through competition, the consultants forecast climbing use to increase only incrementally. A manageable number of longer-term partnerships offer a strong opportunity to improve stewardship and protect the wilderness, while also mitigating the administrative burden to park staff. Past history with multiple concessioners in Mount Rainier National Park and Denali National Park has shown that visitor experience satisfaction may increase by offering a variety of service providers.

This report also provides specific implementation recommendations:

- Limited-trip CUAs will allow for 3 calendar days of climbing with a maximum group size of 12 clients per day and industry standard client-to-guide ratios appropriate for the terrain.
- Routes such as the Keyhole Route and the Loft Route on Longs Peak will be re-classified as technical climbs, not hikes, for the purpose of commercial services.
- Ski mountaineering will also be defined as technical mountaineering and allowed only under a guided climbing and technical mountaineering permit.
- Avalanche 1 classes will remain an authorized activity under the winter activities CUA and not considered guided climbing or technical mountaineering.
- A communications plan for the roll-out of the new CUAs and concessions contracts and recommendations for the data collection process, scheduling, engagement of the climbing community, and standards for vetting climbing companies can be found on pages 55 – 59.

The following key factors could adversely impact the implementation of the recommended option: the NPS financial feasibility analysis; the park's need to manage day-use rather than commercial use; increased use of beginner and intermediate climbs; limited management and monitoring resources of the concessions management team; and requiring certification for guides in the park. Strategies for mitigating these key factors are included in the report on pages 60 – 62.

Signatures:

Recommended by:

Vaughn Beber 9/11/14
Park Superintendent /Date

Approved by:

Alex G. Martin 12/2/14
Regional Director Date

II. Commercial Services Strategy: Purpose and Methodology

Purpose

The National Park Service (NPS) defines commercial services as any product, activity, or service offered to park visitors that uses park resources, and for which compensation is made to a third party. Commercial services play a vital role by offering park visitors services and activities that the government does not provide directly to the public.

A Commercial Services Strategy (CSS) allows a park to:

- Describe park conditions for visitor use and commercial services;
- Outline relevant management policies;
- Detail potential commercial service opportunities as recommended by park staff, volunteers, partners, visitors, members of the public, and other relevant stakeholders;
- Create a framework of necessary and appropriate criteria, to be used for evaluating commercial services;
- Map existing and potential services to the necessary and appropriate criteria framework, and provide reasoning behind services deemed inappropriate;
- Identify high-priority commercial services opportunities, including ideal locations, and authorization vehicles; and
- Outline an action plan for implementation

A variety of stakeholders provide input throughout the development of a CSS. Incorporating feedback from park staff, partners, volunteers, visitors, and the public ensures the document represents the perspective of the park's diverse stakeholder groups.

The CSS is typically a five-year strategy but can be updated to respond to changing conditions or proposals of new services. While the CSS identifies and validates future commitments of resources, it does not act as a compliance document, nor does it assess environmental impact. The final CSS is recommended by the Superintendent and approved by the Regional Director.

Methodology

NPS Business Plan Internship consultants Lauren Dunn and Danielle Platt prepared this Commercial Services Strategy for commercial guided climbing and technical mountaineering in Rocky Mountain National Park (ROMO) in the summer of 2014. The process began with a review of ROMO's planning documents, including the park's enabling legislation, Long Range Interpretive Plan, 2001 Backcountry/Wilderness Management Plan and Environmental Assessment, 2013 Foundation Document, the 1998 Draft Commercial Services Management Plan, and the 1990 Climbing Task Force Findings.

The consultants also reviewed park data regarding visitation and visitor use; analyzed financial reports from the current concessioner and conducted a series of interviews with the ROMO management team, park staff members, the current concessioner and CUA holders and applicants, climbing permit managers at other land management organizations including other national parks, Bureau of Reclamation, Bureau of Land Management, US Forest Service, state parks, county open spaces, and other park stakeholders.

To obtain wider stakeholder input, the consultants hosted an open house at the American Mountaineering Center in Golden, CO on July 15, 2014 to discuss commercial guided climbing and technical mountaineering services at ROMO. All members of the public were invited to attend. In addition, members of the public were invited to provide comments online through an anonymous form posted on the park website.

The insights gained through these methods helped develop necessary and appropriate criteria and commercial service recommendations. The consultants then worked with the management team to analyze these recommendations for fiscal, regulatory and operational feasibility, and prioritized them accordingly.

III. Management Policies

The management principles of Rocky Mountain National Park reflect national policy directives and aid the administration and protection of the park's resources. These principles set broad boundaries for the types of commercial service activities that can occur within the park.

The following management principles are drawn from ROMO's 2013 Foundation Document, along with input provided by the park's general management team. Commercial services must conform to the following principles in order to operate within the park.

Fundamental Resources and Values

Fundamental resources and values (FRVs) are those features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes determined to warrant primary consideration during planning and management processes because they are essential to achieving the purpose of the park and maintaining its significance. In order to operate within the park, commercial services must not negatively impact these FRVs in any significant way.

The following fundamental resources and values have been identified for Rocky Mountain National Park:

- Access to wild places – The exceptional access to wild places available in Rocky Mountain National Park increases the relevancy of the park and fosters stewardship by providing urban escape, offering recreational opportunities, and linking visitors back to nature. The park's high-quality roads, trails, and shuttle systems bring visitors to the doorstep of wilderness and help support a high quality visitor experience.
- High-elevation ecosystems – The high-elevation ecosystems of Rocky Mountain National Park represent a dynamic interaction of southern Rocky Mountain landscapes. The park's alpine tundra, a component of this confluence, is iconic throughout the Intermountain West and holds international significance.
- Wilderness character – Ninety-five percent of Rocky Mountain National Park is designated as wilderness, and this vast and steep landscape strongly exemplifies the qualities that comprise wilderness character. The largely pristine and primitive landscape provides opportunities for personal challenge and a natural haven for flora and fauna to thrive.
- Headwaters of the Continental Divide – Headwaters provide a source of clean fresh water to four major river systems, including a 14-mile wild segment of the Cache la Poudre Wild and Scenic River, the Big Thompson River, and the iconic Colorado River. Water has defined the landscapes of the park and is integral to the three major ecosystems (alpine, subalpine, and montane) and some of the park's rarest habitats (alpine lakes, fens, bogs, riparian willow and aspen communities). Headwaters lakes and streams support unique communities of aquatic, riparian, and terrestrial species.
- Ability to experience a wide variety of recreational opportunities – Rocky Mountain National Park is a premier Colorado destination that provides an exceptionally wide range of recreational experiences for a diverse group of users. The park's varied visitor opportunities include high elevation experiences along the Continental Divide National Scenic Trail, strolls around Bear Lake, climbs up lofty Longs Peak, and wildlife viewing and scenic driving along Trail Ridge Road.
- Traces of human footprints on the landscape – Rocky Mountain National Park's landscape has been a magnet for people through time. Visitors can still experience the remnants of diverse historic uses, ranging from Paleo-Indian big game drives, to extractive activities and dude ranching, to early tourism and recreational activities that led to the popular support for the area's designation as a national park.

Rocky Mountain National Park contains other resources and values that may not be fundamental to the purpose and significance of the park, but are important to consider in management and planning decisions. These are referred to as other important resources and values.

Other Important Resources and Values

- Beaver Meadows Visitor Center – Beaver Meadows, considered one of the four most significant visitor centers produced during the Mission 66 era, was designated a national historic landmark in 2001. Frank Lloyd Wright's studio, Taliesin Associated Architects, designed the building during the critical time following Wright's death in 1959. The 1967 visitor center expresses Wright's blending of modern architecture and modern construction materials with the surrounding environment and use of indigenous natural materials.



Two ice climbers near the Loch, by John Marino, February 5, 2011.

IV. Desired Conditions

Desired conditions describe how commercial services may operate at Rocky Mountain National Park and how they complement park management objectives. Any commercial service at ROMO must seek to maintain or attain all relevant desired conditions. This section provides both general standards for all commercial operations as well as the desired conditions for guided climbing and technical mountaineering activity and geographic locations that currently see climbing and mountaineering usage.

General Conditions

The following objectives describe the standards for all commercial operations and apply to all alternatives, consistent with the park purpose and commercial services statement. The statements describe the conditions to be maintained or attained by all services.

Commercial services conditions to be maintained or attained:

- Commercial services provided complement the effort of the NPS to achieve its mission.
- Commercial services help ROMO achieve its management objectives.
- The commercial services, activities, and facilities are appropriate and meet high standards.
- Commercial services foster stewardship among the visitors and enhance their understanding and appreciation for the park and its resources.
- Visitors' enjoyment of the park is expanded through commercial services while adverse impacts to the park environment are minimized.
- Commercial services are safe and of high-quality.
- Commercial services are provided in a professional, efficient, and friendly manner.
- Commercial services are available, within reason, to all visitors regardless of physical capabilities.

Operations conditions to be maintained or attained:

- Operations are consistent and compatible with resource management objectives and the park's natural and cultural values.
- Facilities and commercial services meet or exceed all applicable laws, regulations and policies including but not limited to laws relating to environment, employment, accessibility, safety, etc.
- Employees are well trained and knowledgeable about the park.
- Staffing levels are adequate and operators are responsive to changing visitor needs.
- Rates are comparable to those charged for similar services outside of the park.
- Dates and hours of operation meet visitor needs and NPS management objectives.
- Positive relationships and a proactive approach to issues exist between the NPS and commercial service operators.
- Commercial services do not unreasonably displace or disturb park visitors.
- Limitations on commercial activities are based upon resource and facility constraints as well as park visitor management objectives.
- Activities vary in duration and price.

Facilities conditions to be maintained or attained:

- Commercial service operators provide facilities that meet diverse visitor needs and enhance their enjoyment of Rocky Mountain National Park.
- Facilities incorporate sustainable design principles and meet ADA standards.
- Facilities comply with park design standards and architectural themes.
- Landscaping is compatible with the natural and cultural values of each area.
- Utility systems are adequate to support operations.
- Facilities are safe, appealing, clean, and well-maintained.
- Operators take financial responsibility for facility maintenance.

Interpretation, information, and education conditions to be maintained or attained:

- Services and information provide visitors with a better understanding of the park.

- Programs are complementary to NPS activities.
- Information is accurate and reflects park resources, themes, issues, and values.
- Programs reach local and global audiences using appropriate media including new technology.
- Information and educational material and services provided by commercial operators are approved and evaluated by the NPS.
- Informational content fosters public support for the preservation and protection of national park systems.
- Commercial services help park management prepare and educate visitors before entering other areas of the park.

Desired Conditions for Activities

These desired conditions of commercial services relate specifically to guided activities and climbing and technical mountaineering.

Guided activities general conditions to be maintained or attained:

The following relate directly to the desired future condition of guided activities or services, including guided climbing and technical mountaineering. Guided activities enable the visitor to safely experience and understand values and resources of Rocky Mountain NP while minimizing impacts to park resources and other visitor experience.

- Commercial service operators do not degrade park resources for other visitor experiences.
- Commercial service operators foster stewardship among the visitors and enhance their understanding and appreciation for the park and its natural and cultural resources.
- Competent guides provide safe, high-quality experiences.
- Commercial service operators ensure safe practices.

Climbing and technical mountaineering conditions to be maintained or attained:

Provide safe, high-quality climbing and technical mountaineering instruction and guiding experiences with a minimum impact on park resources.

- Well-qualified guides provide safe and high quality services.
- The nature of the activity is such that a guide can increase the margin of safety for the client.
- Operators practice and teach minimum impact, or “clean”, climbing techniques.
- Operators foster stewardship among the visitors and enhance their understanding and appreciation for the park and its natural and cultural resources.
- Climbing operations do not degrade park resources or other visitor experiences.

Desired Future Conditions for Areas

These desired conditions of commercial services relate to various areas of the park. These areas are defined by their unique resources and facilities as well as the experiences they provide to the visitor.

Front-country/Developed conditions to be maintained or attained:

Activities within developed areas of the park should provide opportunities for the greatest number of people to have easy and quick access to popular areas of ROMO. The level of commercial activity can be higher in more developed settings.

- Operations seek to provide the broadest range of services.
- Commercial services assist the park in containing and repairing resource impacts and managing use.
- Larger groups can be accommodated.
- Support services are readily available; full emergency service and a wide range of guided activities can occur and originate from this area.
- Information provided is general.

Front-country/Transition conditions to be maintained or attained:

Activities within transitional areas in the park should provide reasonable access to primitive or limited developed opportunities including in outlying areas of the park. The level of commercial activity should be moderate in more rustic settings.

- Commercial services assist the park in containing and repairing resource impacts and managing use.
- Larger group sizes may be accommodated.

- Support services may be available; full emergency service and a wide range of guided activities can occur and originate from this area.
- Information provided is general.

Back-country III conditions to be maintained or attained:

These areas include formal trail corridors and established campsites. Use is moderate to high and there is a broad spectrum of opportunities for solitude. Commercial services provide groups, up to medium size, opportunities to access primitive areas in a rustic setting consistent with park backcountry and wilderness management.

- Medical emergency services and moderate guided activities are available.
- No support activities.
- Visitor interaction is moderate to high.
- Information is broader and based on natural and cultural themes of the park.

Back-country II conditions to be maintained or attained:

These areas include crosscountry routes and camp areas and bivouac camping. Use is low to moderate, with opportunities for solitude high most of the year (moderate in summer months) with some noises expected. It is predominately unmodified natural environment, except for minor losses of vegetation on routes and at campsites. Commercial services provide small groups opportunities to access primitive areas in a natural setting consistent with park wilderness management values (i.e. low use, natural setting, small group size).

- No support services are provided.
- Limited emergency medical services may be provided.
- Some guided activities are provided.
- Visitor interaction is minimal to low.
- Information and interpretation is more specific, detailed, and in depth.

Back-country I conditions to be maintained or attained:

These areas include Research Natural Areas, tundra areas, etc. Use is low and opportunity for solitude is high. Resource impacts are non-discernable and there are no designated trails. Commercial services provide individual parties restricted opportunities to access primitive areas in a pristine setting consistent with park wilderness management values (i.e. restricted activities encourage solitude and a pristine setting—some areas are closed, party size will be restricted).

- Limited emergency medical service may be provided.
- Restricted guided activity.
- No support activities.
- Visitor interaction is low to none.
- Information and interpretation is very specific, detailed, and in-depth.



Climber on Flying Butress, NPS Photo, 2014.

V. Necessary and Appropriate Criteria

Following the review of Rocky Mountain National Park's enabling legislation, the park's 2009 Wilderness Designation, the Backcountry/Wilderness Management Plan and Environmental Assessment, and other park planning documents, the park has determined that guided climbing and technical mountaineering is necessary and appropriate.

The terms "necessary and appropriate" were not defined in the legislative history of the park. However, both the 1916 Organic Act and the 1965 Policy Act place emphasis on the conservation and preservation of NPS resources, while at the same time providing for their use in a prudent and unimpaired manner. The National Park Service Concessions Management Improvement Act of 1998 describes that "the development of public accommodations, facilities, and services in units of the National Park System shall be limited to those accommodations, facilities, and services that are necessary and appropriate for public use and enjoyment of the unit of the National Park System in which they are located." Necessary and appropriate criteria help parks determine which commercial services can enhance the visitor experience while not negatively impacting the park and its ability to carry out its mission.

For the purpose of carrying out the Concessions Policy Act, the following necessary and appropriate criteria apply to guided climbing and technical mountaineering:

Necessary: enhances visitor experience by facilitating access to and enjoyment of park resources.

Appropriate: services do not conflict with or diminish the purpose for which Rocky Mountain National Park was established: to preserve the high-elevation ecosystems and wilderness character of the southern Rocky Mountains within its borders and to provide the freest recreational use of and access to the park's scenic beauties, wildlife, natural features and processes, and cultural objects.

Enabling Legislation

The Act of January 26, 1915 (38 Stat. 798), establishing Rocky Mountain National Park stated the "area is dedicated and set apart as a public park for the benefit and enjoyment of the people of the United States... with regulations being primarily aimed at the freest use of said park for recreational purposes by the public and for preservation of the natural conditions and scenic beauties thereof." Various amendments, legislative acts, and proclamations followed the original act which must be considered and applied to the park's current purpose. Perhaps the most important and influential legislation is the Act of August 25, 1916 (39 Stat. 535), establishing the National Park Service. This Act defines the mission of the National Park Service as follows: "to conserve the scenery and the natural and historic objects and wildlife therein, and to provide for the enjoyment of same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

In consideration of the park's enabling legislation and subsequent legislation, it is recognized that guided climbing and technical mountaineering are fundamentally consistent with the purposes for which Rocky Mountain National Park was established.

1964 Wilderness Act and the 2009 Designation of the Rocky Mountain National Park Wilderness Area

Rocky Mountain National Park was declared 95% wilderness in 2009, but the park has managed it as such since June 13, 1974, when President Nixon recommended to Congress to officially designate the park as wilderness under the Wilderness Act of 1964. NPS policies recognize climbing and technical mountaineering as a legitimate recreational activity within national parks, including wilderness. Climbing and technical mountaineering have been popular activities in and around the area known today as Rocky Mountain National Park since the 1800's.

In March of 2009, 250,000 acres of the park were officially designated as the Rocky Mountain National Park Wilderness Area, permanently protecting these acres from human impacts. Wilderness, according to the Wilderness Act, "...in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain." The Wilderness Act goes on to describe wilderness as a place "retaining its primeval character and influence" where there are "outstanding opportunities for solitude".

Backcountry/Wilderness Management Plan and Environmental Assessment (BWMP)

The park's 2001 Backcountry/Wilderness Management Plan and Environmental Assessment (BWMP) recognizes the tension between wilderness and commercial services, stating that while the Wilderness Act asserts that "there shall be no commercial enterprise... within any wilderness area," the Act permits that "commercial services may be performed within... wilderness areas... to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas." The BWMP states that "commercial services that are appropriate in the backcountry/wilderness generally consist of guided activities," and that the Park has determined that climbing and technical mountaineering meets the necessary and appropriate requirement in the backcountry/wilderness.

In balancing preservation vs. use, the BWMP acknowledges that the objective "is to allow climbing to continue as freely as possible, while minimizing impacts on environmental resources and other park visitors." The philosophy of providing for the enjoyment of Rocky Mountain National Park visitors through concessioner services clearly implies the need to permit commercial activity while promoting and protecting wilderness character.

Background on Necessary and Appropriate Criteria

The National Park Service's guidelines on necessary and appropriate criteria were used to evaluate guided climbing services. Necessary and appropriate criteria are the benchmarks that the NPS uses to decide whether or not a commercial service may take place in a park. They allow a park to easily identify which services can be considered for a Commercial Use Authorization, concession contract, or lease.

Necessary criteria help to answer the question, "*Why is this service important for the park?*" These criteria describe how a commercial service could enhance the visitor experience and further the goals and mission of the park. Necessary criteria are unique to NPS concession contracts; while Commercial Use Authorizations do not need to meet any necessary criteria, concession contracts must meet at least one necessary criterion.

Appropriate criteria help to answer the question, "*Can the park authorize this service without compromising the reason it is a unit of the National Park System?*" These criteria provide insight into the critical components of the park and visitor service that cannot be compromised and they describe the potential negative impacts of commercial services that must be prevented. All commercial services—whether a Commercial Use Authorization, concession contract, or lease—must meet all appropriate criteria to operate in the park.

We recommend that for future decisions on commercial service operations, Rocky Mountain National Park should use the following necessary and appropriate criteria:

Necessary Criteria:

(Concessions must meet at least one necessary criterion. Commercial Use Authorizations may be issued without meeting any necessary criteria.)

- Enhances visitor understanding and appreciation of park purpose and values.
- Enhances visitor experience by facilitating access to and enjoyment of park resources including the protection of the park's natural and undeveloped qualities.
- Assists the park in managing visitor use and educating park visitors in appropriate, safe, and minimum-impact techniques.

Appropriate Criteria:

(Commercial services must meet all appropriate criteria.)

- Services do not conflict with or diminish the purpose for which Rocky Mountain National Park was established: to preserve the high-elevation ecosystems and wilderness character of the southern Rocky Mountains within its borders and to provide freest recreational use of and access to the park's beauties, wildlife, natural features and processes, and cultural objects.
- Services are consistent with all applicable management plans, NPS policies, and federal, state and local regulations.
- Services do not compromise public health, safety, or well-being:
 - Services carry appropriate insurance.
 - Services meet all federal, state, and local health and safety codes and regulations, and provide relevant safety instructions to visitors.

- Services do not significantly impact fundamental park resources and values, including access to wild places, high-elevation ecosystems, wilderness character, headwaters of the Continental Divide, ability to experience a wide variety of recreational opportunities, and traces of human footprints on the landscape.
 - Services protect the natural wilderness character through education.
 - Services protect the undeveloped quality of the park through minimum impact techniques.
- Services do not unduly conflict with other authorized park uses and activities, or with services outside the park.
- Services do not monopolize recreational opportunities at the expense of the general public.



Carabiner and Rope Detail, NPS Photo, undated.

VI. Park Overview

A. Background of Rocky Mountain National Park

The National Park Service was established in 1916 by the Organic Act to “preserve unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations.” Established by Congress on January 26, 1915, Rocky Mountain National Park encompasses 265,761 acres or 415 square miles of the scenic southern Rocky Mountains. The park’s mountains support a diversity of ecosystems, including montane, subalpine, and alpine biological communities, ranging in elevation from 7,600 to 14,259 feet. The park also includes lush riparian and aquatic ecosystems based in 147 lakes and 450 miles of streams that speckle and divide the other ecosystems. Seventy-two named peaks rise above 12,000 feet, with the high point being the expansive summit of Longs Peak at 14,259 feet.

In 2009, Congress designated the Rocky Mountain National Park Wilderness Area, covering about 252,085 acres, or 95% of the park. Wilderness designation protects the land’s wilderness character, natural, untrammeled, and undeveloped conditions; opportunities for solitude and primitive recreation; and scientific, educational, and historical values.



Climbers speak with a ranger, NPS Photo, undated.

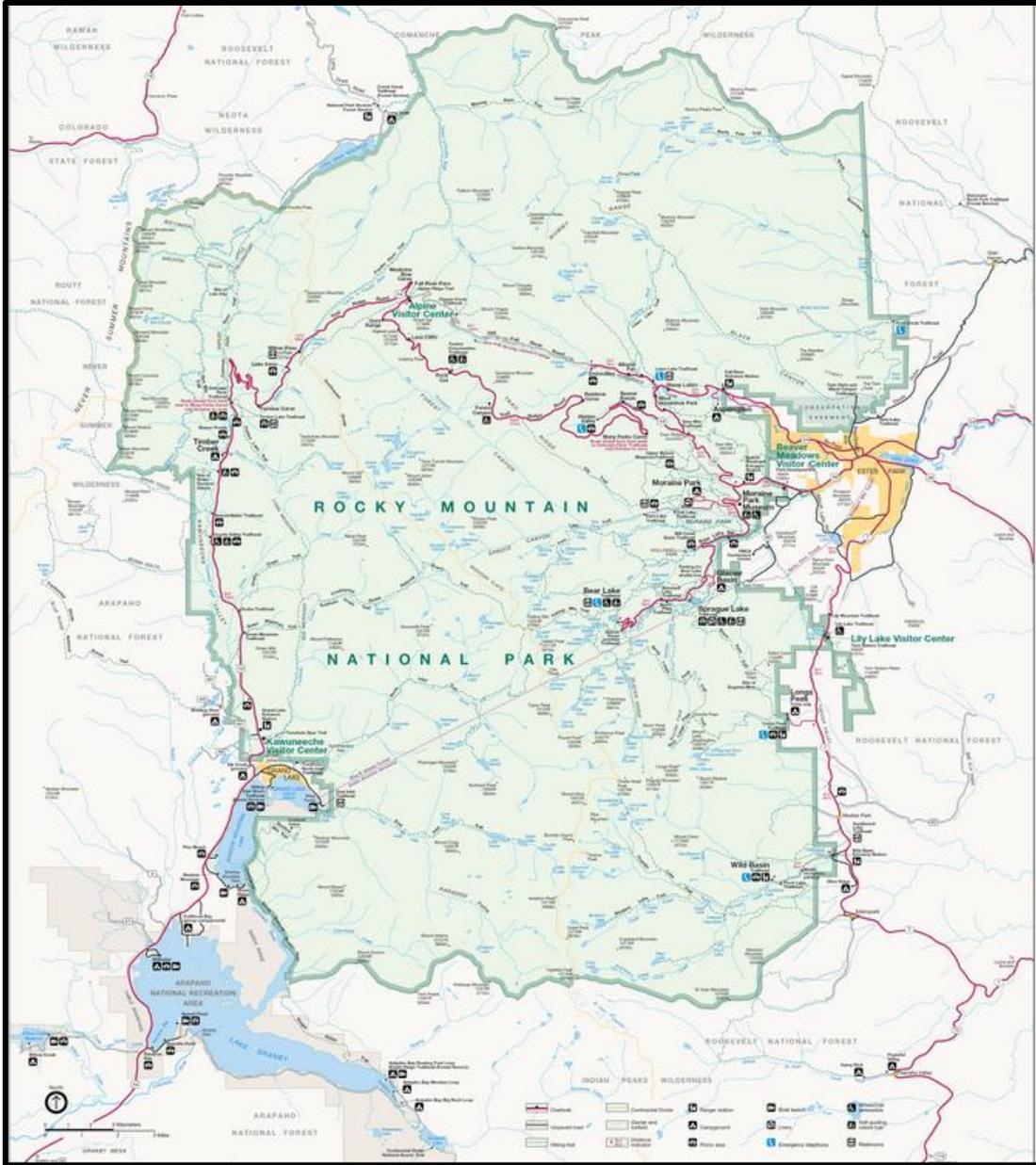


Figure 1: Map of Rocky Mountain National Park

B. Visitation

Park Visitation

Visitation at Rocky Mountain National Park has grown over the past 20 years to approximately 3 million visitors a year since the early 1990s (see figure 1). In 2013, the park saw a total visitation of 2,991,141. 2014 attendance through the end of July was 1,807,863, compared to 2013 attendance through the end of July of 1,881,198 and 2012 attendance through the end of July of 1,732,868.

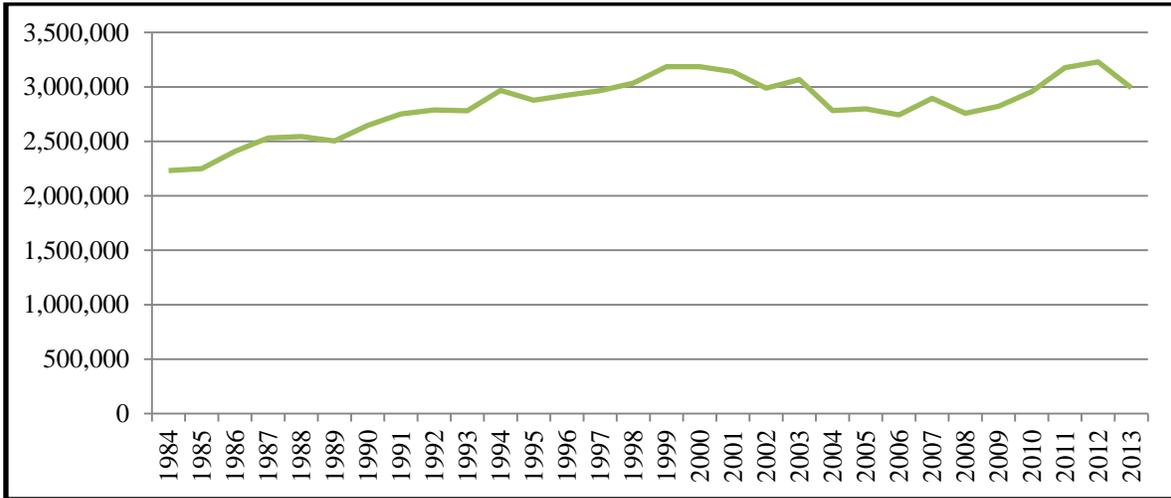


Figure 2: Annual Recreational Visitors at ROMO, 1984-2013

Visitation at ROMO is highly seasonal, peaking during the summer and early autumn (see figure 2). Almost a quarter of visitors come to the park during the month of July.

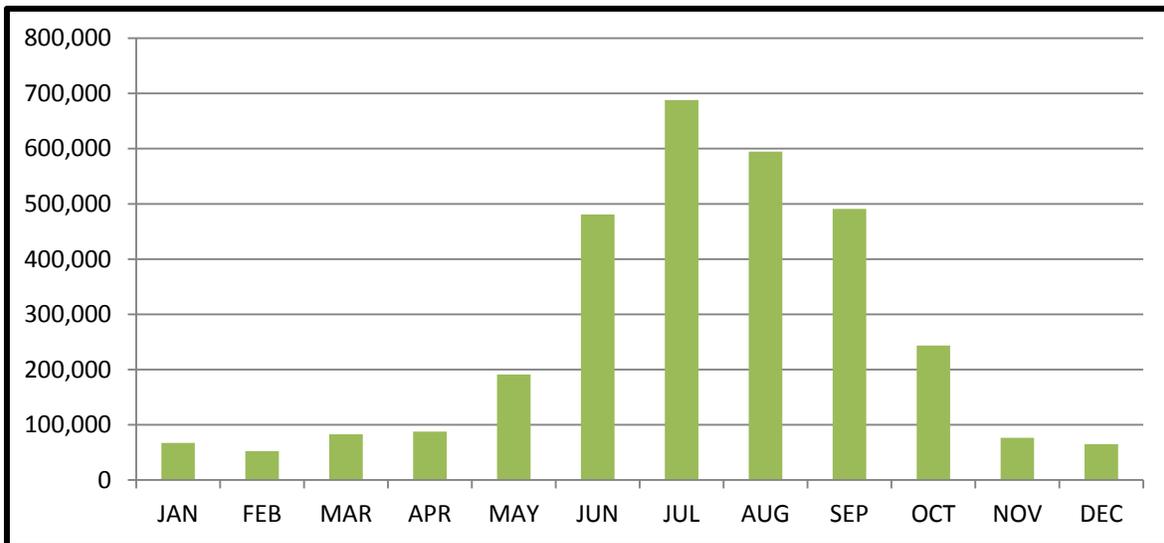


Figure 3: Average ROMO Monthly Visitation (average of 2010-2012)

Park staff reports higher visitation on weekends, even in the summer, with far less traffic on the weekdays. Park staff believes that visitation patterns result from a high percentage of local visitors, and low percentage of international visitors, compared to other national parks with comparable numbers of visitors. From the 2010 Summer Visitor Use Study, 8% of visitors live within a 20-mile radius of the park, 24% of visitors are from Colorado (mostly the nearby Front Range area which is typically recognized as Fort Collins, CO to Colorado Springs, CO), approximately 40% are from Colorado and adjacent states, and 96% are from the United States. Park visitation favors locals even more in the winter, with 77% of visitors coming from Colorado, with 30% of

those visitors specifically from Larimer County. Day-use of the park is high, likely driven by the high percentage of local visitors and by the lack of accommodation beyond camping within park boundaries. Of visitors surveyed, the average number of lifetime visits was 13.3.

Local and Regional Visitation

Tourism to Colorado is increasing, both overall and in the outdoor sector. Outdoor overnight trips to Colorado have slowly and steadily increased over the past 20 years, both in absolute terms (from 2 million trips to 3 million trips¹) and as a share of total outdoor trips in the US (from 3.1% to 3.4%)².

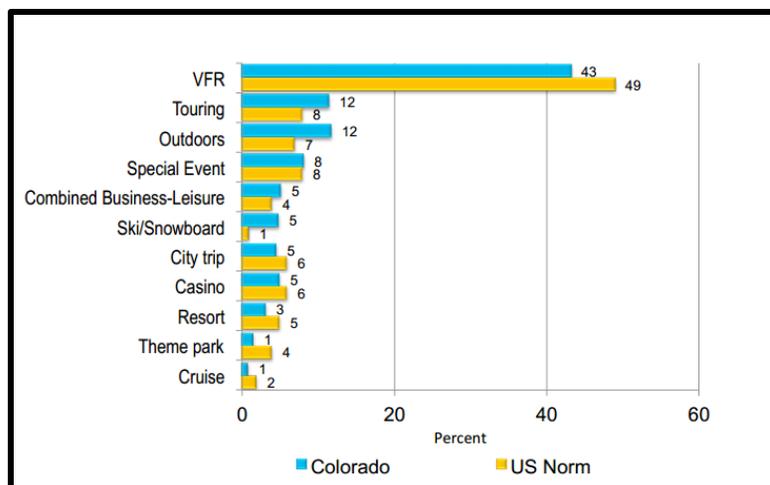


Figure 4: Colorado Trips vs. US Norm

Compared to the average US tourist, Colorado tourists tend to focus on touring, recreating outdoors, and skiing/snowboarding³. Given these trends, the park expects visitation to remain strong as it continues to be a

top destination for touring and the outdoors, both in the summer and the winter. With an increase in total visitors to ROMO, the park also anticipates an increase in visitors taking part in outdoor activities, including climbing and mountaineering.

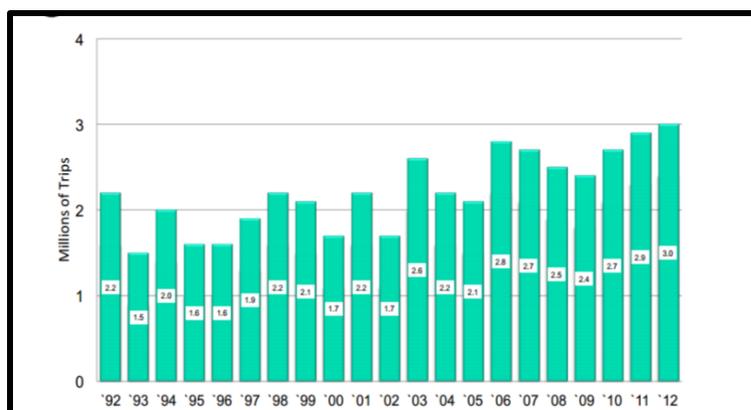


Figure 5: Colorado Overnight Outdoor Trips

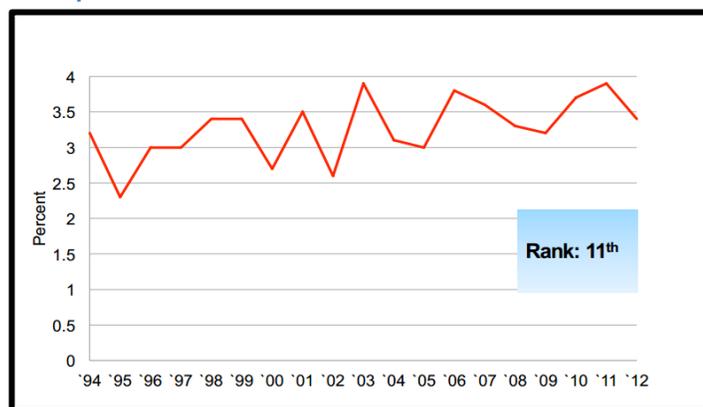


Figure 6: Colorado's Share of Total US Outdoor Trips

¹ Colorado Annual Travel Year Report 2012. Prepared by Longwood's International. Available at: <http://www.colorado.com/sites/colorado.com/master/files/2012Visitor%20FinalReportonline.pdf>. Accessed on August 11, 2014.

² Colorado Annual Travel Year Report 2012. Prepared by Longwood's International. Available at: <http://www.colorado.com/sites/colorado.com/master/files/2012Visitor%20FinalReportonline.pdf>. Accessed on August 11, 2014.

³ Ibid.

C. Park Use

While park uses vary by season, visitors come to ROMO to view scenery and wildlife year-round. In summer, visitors at ROMO primarily view scenery (93%), drive Trail Ridge Road (75%), and view wildlife (73%). A smaller, but notable, share of visitors (7%) report mountaineering/climbing at the park. In winter, viewing scenery (66%) and viewing wildlife (45%) remain the top two visitor uses, followed by snowshoeing (42%). Three percent of winter visitors reported mountaineering/climbing in the winter.⁴

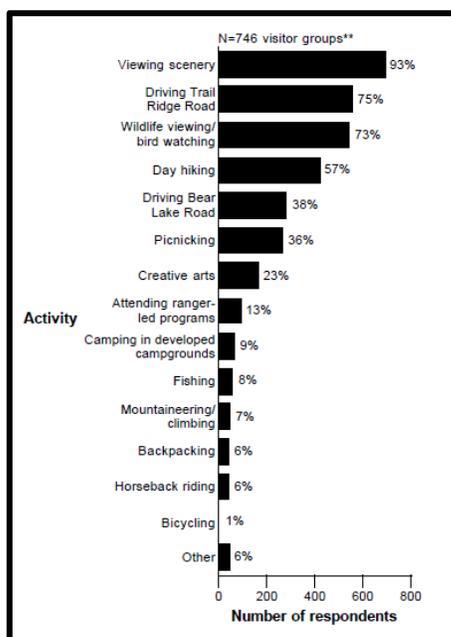


Figure 8: From the 2010 Summer Visitors' Survey, "During this trip to RMNP, in which activities did you participate?"

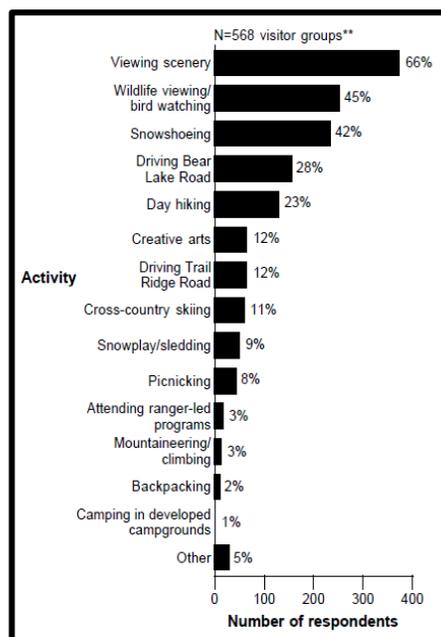


Figure 7: From 2011 Winter Visitors' Survey, "During this visit to RMNP, in which activities did you participate?"

D. Climbing and Technical Mountaineering along the Front Range

Colorado is an epicenter of climbing activity and mountaineering organizations in North America. Many of the largest and most influential climbing and mountaineering organizations operate their headquarters along the Front Range, including the American Alpine Club (Golden), the Access Fund (Boulder), the American Mountain Guides Association (Boulder), the Colorado Mountain Club (Golden), and the Rocky Mountain Field Institute (Colorado Springs).⁵

Popular climbing areas near ROMO include Roosevelt and Arapaho National Forests and the Ironclads near the Eldorado Canyon State Park, Boulder Canyon, and the Flatirons near Boulder, Poudre Canyon and Lory State Park near Fort Collins, Golden Gate Canyon State Park, North Table Mountain, Clear Creek Canyon Parks, and Cathedral Spires in Jefferson County, Black Canyon of the Gunnison National Park, Colorado

⁴ There are limitations in making strong conclusions about park use from the results. Survey administration methods including the distribution of surveys at the three official park entrance gates (Beaver Meadows, Fall River, and Grand Lake) and the voluntary submission of surveys after completion of the park visit may have resulted in an underrepresentation of some sub-groups through self-selection or accessing the park through other trailheads or entry stations.

⁵ Jefferson County Parks Climbing Management Guide. Available at: <http://jeffco.us/parks/climbing/climbing-management-guide/>. Accessed on August 12, 2014.

National Monument, and Ouray Ice Park further west. A variety of public land management agencies manage these areas through a myriad of different permitting models, making navigating and managing permits systems a time-consuming activity for guided climbing companies (see section on *Guided Climbing Strategies in Other Parks*).

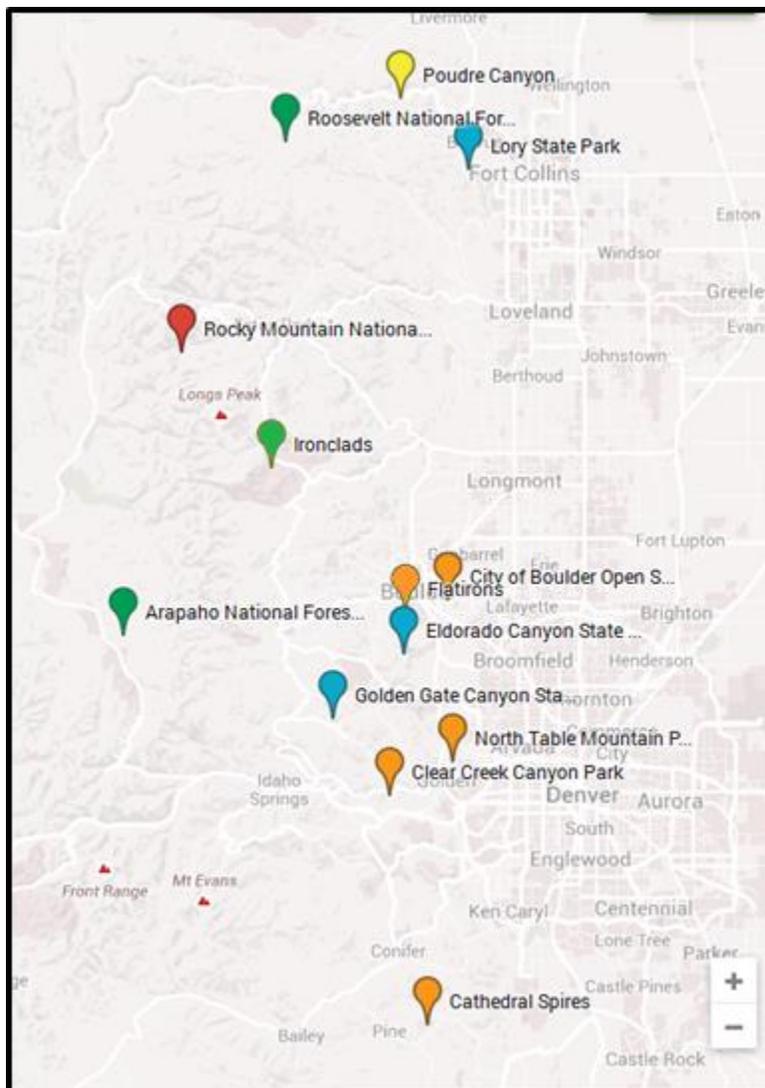


Figure 9: Map of Major Climbing Areas Near ROMO
Key: Red = National Park Units, Green = U.S. Forest Service lands, Blue = CO State Park lands, Orange = County or Local public lands

E. Climbing and Technical Mountaineering in the Park

ROMO offers superb rock climbing, ice climbing, technical alpine mountaineering, and ski mountaineering. Climbers and mountaineers prefer ROMO for its high quality of its granite, the steepness of its routes, the accessibility to a large variety of terrain, the wilderness nature of climbing, and the fame of several of its features. In *Fifty Classic Climbs of North America*, a definitive climbing guidebook and history written by Steve Roper and Allen Steck, three of the four named routes in Colorado are in ROMO: the Diamond on Long's Peak, the South Face of the Petite Grepon, and the Northcutt-Carter Route on Hallett Peak.⁶

A brief history of climbing at the park, as documented by the 1990 Climbing Task Force:

"Mountaineering and climbing pre-date the establishment of RMNP. As early as 1868, non-technical ascents of Longs Peak were recorded.... In the 1950's, climbing activity in the US and in the park markedly increased....With the greater number of climbers came the advent of climbing-specific hardware including ropes and protection devices.... By the 1970's, the number of ... climbs in RMNP warranted the publishing of a climbing guidebook.... By the 1980's, more of the previously aided big walls were receiving free ascents."

The park features primarily traditional climbing routes, as opposed to sport climbing or top-roping, although bouldering has notably grown in popularity in recent years. Traditional climbing, which does not involve fixed gear and requires the most technical skills, is most consistent with the wilderness experience and historical uses of the park.

Season	Date	Total Climbing Visitors	Total Guided Climbing Visitors	Private Climbers as % of Total Climbers	Guided Climbers as % of Total Climbers
Summer Visitors' Survey	July 18-24, 2010	10,565	25	99.8%	0.2%
Winter Visitors' Survey	Feb 19-27, 2011	379	56	85.2%	14.8%

Figure 10: Climbing at ROMO: Private vs. Guided

Location	Date	Total Visitors at Trailhead	Estimated Visitors Who Climb/ Mountaineer at this location	Total Guided Climbing Visitors	Guided Climbers as % of Total Climbers
Long's Peak	July-August, 2013	51,012	35,708	47	0.1%
Lumpy Ridge	May-August, 2013	63,226	13,277	124	0.9%

Figure 11: Private vs. Guided Climbing in Popular Climbing Areas at ROMO

Guided climbing, managed by the park's commercial services, began in the mid-70s with a single concessioner, Fantasy Ridge School of Alpinism. For more than 30 years, the sole concessioner for guided climbing at the park has been Colorado Mountain School (see section *Current Guided Climbing Contract*). Though the park does not have exact numbers, it estimates that less than 1% of total climbing at ROMO results from guided climbing; the remainder comes from private, non-commercial use.⁷

The figure below summarizes private climbing routes at ROMO from the MountainProject.com, an online forum

⁶ Steck, Allen and Steve Roper. *Fifty Classic Climbs of North America*. Sierra Club Books, 1979.

⁷ This estimation was calculated by combining data from the 2010-11 Visitor Surveys, Colorado Mountain School, and popular climbing trailheads.

dedicated to climbing.

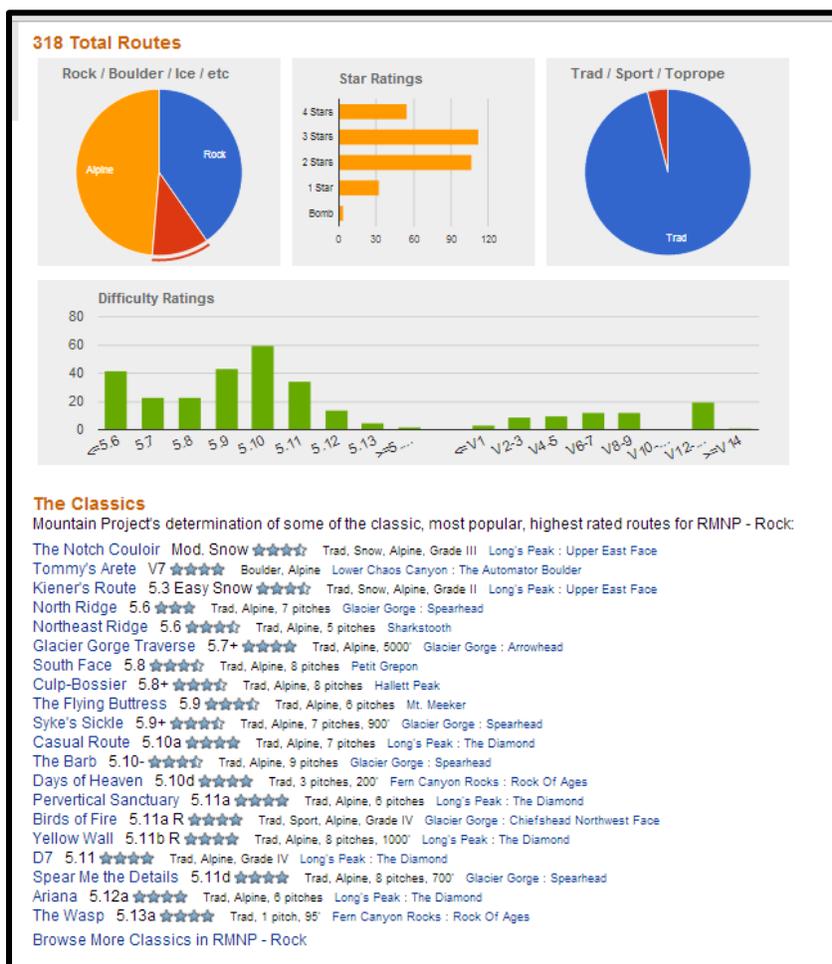


Figure 12: Summary of Climbing Routes at RMNP⁸

⁸ MountainProject.com. "RMNP-Rock." Available at: <http://www.mountainproject.com/v/rmnp---rock/105744460>. Accessed on August 11, 2014.

VII. Commercial Services at the Park

A. Overview

Commercial services at Rocky Mountain National Park currently consist of 16 activities, ranging from a gift store to outdoor recreation activities, like climbing, to photography. Commercial services are primarily managed through concessions contracts, Commercial Use Authorizations (CUAs), and Special Use Permits (SUPs). There are currently 18 concessioners and 130 CUA holders operating in the park. The park manages the gift store, horseback riding, wood sales, and climbing and technical mountaineering through limited concession contracts, while the other activities are managed through an unlimited number of CUAs. Most concessioners manage some sort of physical space within the park; with the exception of horses (roughly only half of the concessioners have liveries within the park) and climbing and technical mountaineering. Franchise fees range from 3-5%. Approximately 80% of concession and CUA holders are from Colorado, while the other 20% are from out of state. The concessions program is currently managed by 1.5 full-time equivalents: a Supervisory Management Specialist and a Concessions Management Specialist.

The most highly utilized services in terms of visitors served are guided hiking (10,000 visitors annually), shuttle van tours (5,000 visitors), fly fishing instruction (5,000 visitors), and the gift store/convenience store (exact data unavailable). The climbing/technical mountaineering concessioner served approximately 1,400 user days in 2013.

Activity	Authorization		
	Concessions	CUA	Total
Climbing	1	4	5
Climbing Guide Certification		1	1
Convenience Items		1	1
Fly Fishing Instruction		16	16
Frontcountry Bicycle Tours		5	5
Gift Store	1		1
Guided Backpacking		31	31
Guided Hiking		34	34
Horses	14		14
Llama Packing		1	1
Photo Workshop		8	8
Portrait Photography		7	7
Shuttle Van Tours		7	7
Wedding Services		1	1
Winter Activities		14	14
Wood Sales	2		2
Total	18	130	148

Figure 13: Commercial Services at ROMO by Activity and Authorization

B. Current Guided Climbing and Technical Mountaineering Concession Contract

For more than 30 years, ROMO has operated commercial guided climbing and technical mountaineering through 10-year concession contracts to one concessioner, Colorado Mountain School (CMS). In the most recent concession contract (2004), CMS is required to provide technical instruction and guide service in rock climbing, ice climbing, mountaineering, and rescue training. Additionally, CMS is authorized to provide instruction and guide service in ski mountaineering, non-technical mountaineering, avalanche awareness, and education classes and other classes appropriate to climbing and mountaineering. The park has a positive, though very low touch, relationship with CMS: CMS consistently passes annual evaluations, and park staff speaks highly of CMS's safe, well-run program.

CMS's annual revenue at ROMO has grown slightly every year since 2009 to \$231,000 in 2013, although it has not yet recovered to pre-recession levels. In early September 2013, a flood in the Estes Park valley restricted access to the park and total ROMO visitation. Subsequently CMS's total number of guided climbing clients dove below average monthly levels from September to December 2013. Prior to this disruptive event, CMS business was trending 24% above 2012 levels.

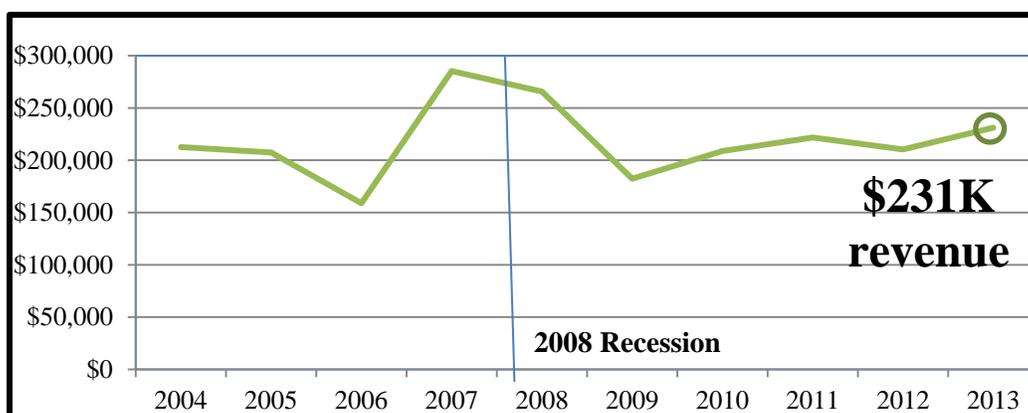


Figure 14: CMS Annual Revenue, 2004-2013

Unlike annual park visitation which peaks during summer months, guided climbing and technical mountaineering see bimodal seasonal visitation. There are high seasons in both summer and winter.

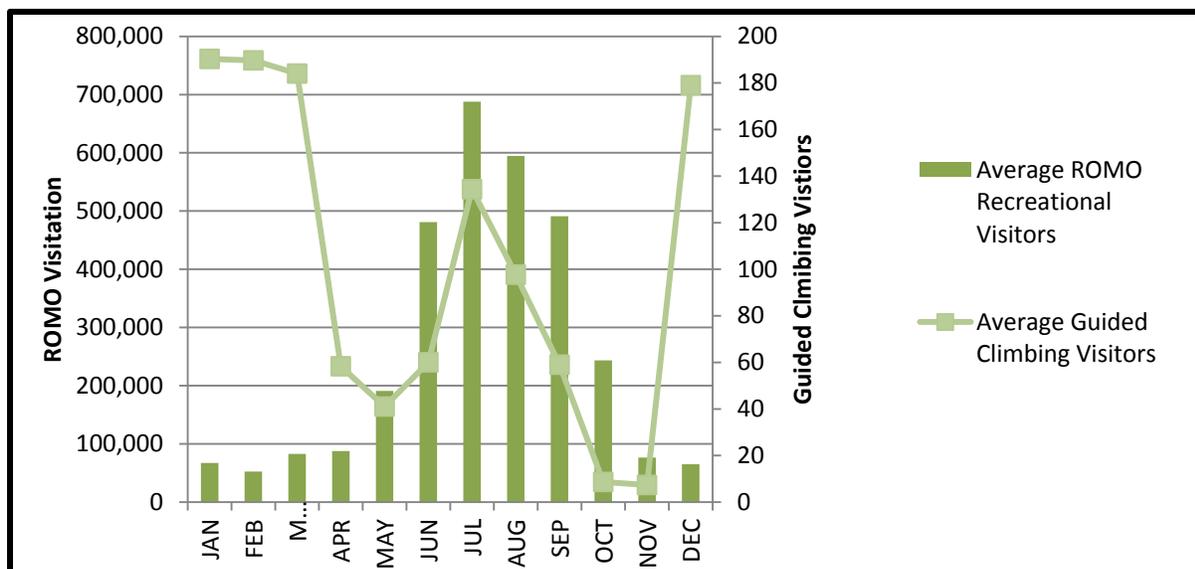


Figure 15: Seasonality, 3-year average, 2010-2012⁹

⁹ January and April 2010 data is missing.

Avalanche classes comprised more than 60% of CMS's business in 2013 and are also driving most of the growth in recent years.

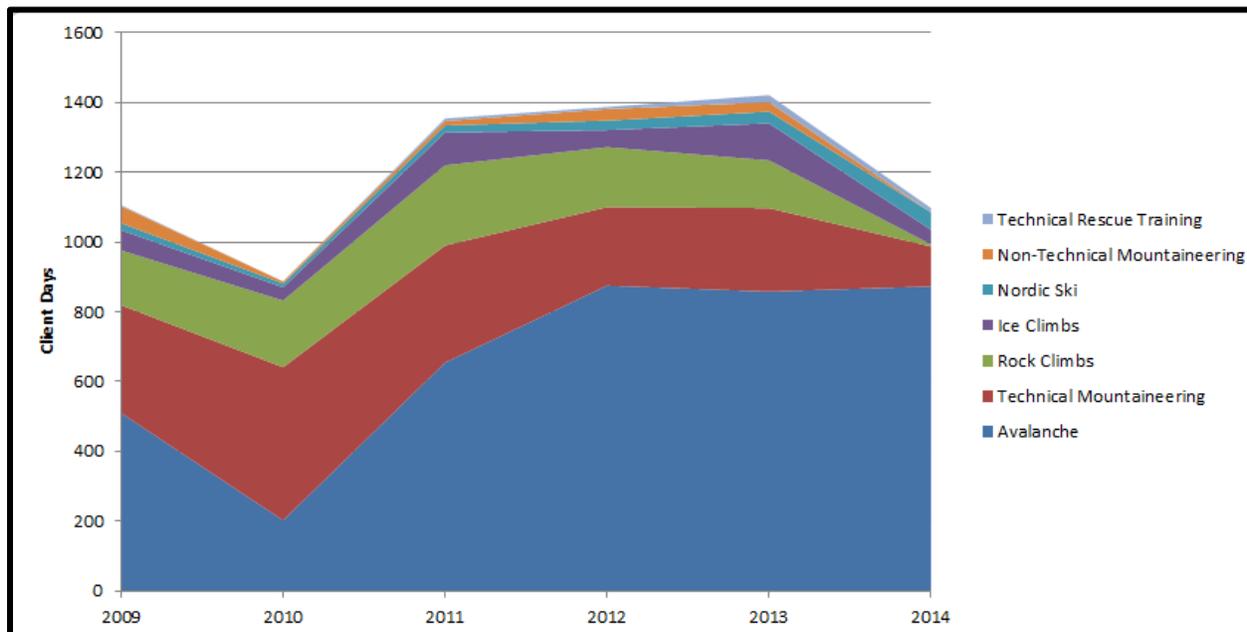


Figure 16: CMS Guided Climbing by Type of Activity¹⁰

After avalanche classes, CMS's most popular activities are technical mountaineering and guided climbing. Total rock climbing activity has been essentially flat since 2009, technical mountaineering activity has been declining; both activities would have likely seen a bigger uptick in 2013 without the flood.

CMS most frequently uses Tyndall Gorge, Trail Ridge, and Lumpy Ridge for guided climbing. Tyndall Gorge and Trail Ridge see winter month usage primarily for avalanche classes, while CMS uses Lumpy Ridge during the spring, summer, and fall for rock climbing.

Activity	Client Days
Technical Mountaineering	239
Rock Climbs	137
Non-Technical Mountaineering	27
Ice Climbs	106
Technical Rescue Training	20
Avalanche	858
Nordic Ski	34

Figure 17: CMS 2013 Climbing Days by Activity

¹⁰ January and April 2010 data is missing.

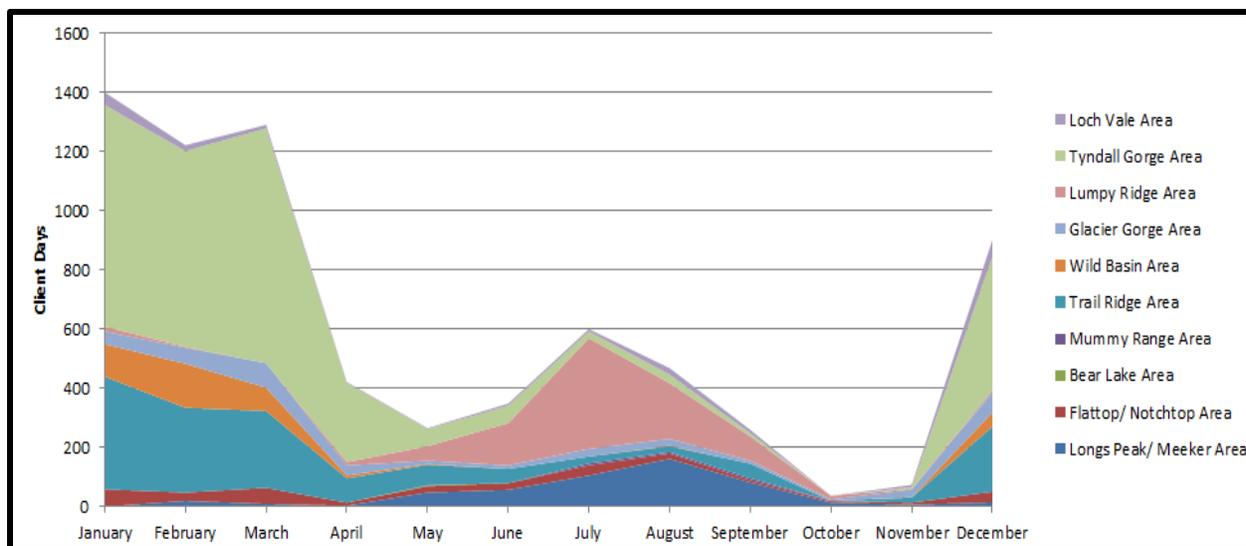


Figure 18: CMS Guided Climbing by ROMO Geographic Area, 2009-2014¹¹

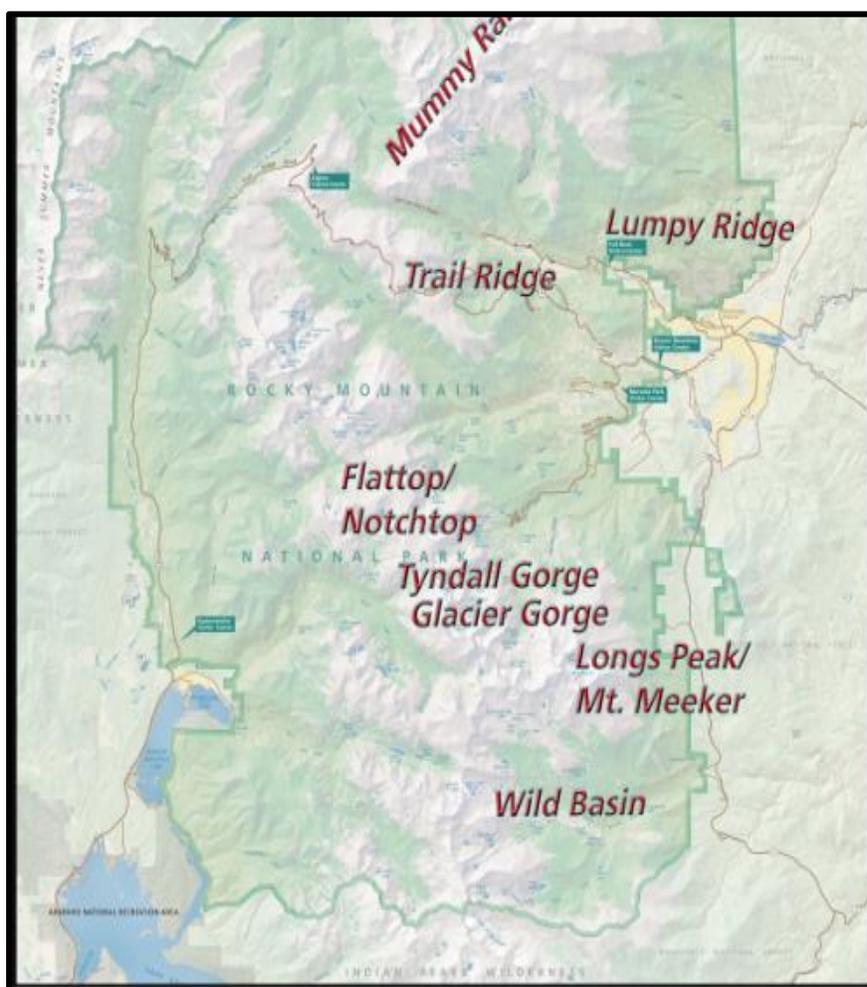


Figure 19: Main Climbing Areas at ROMO

¹¹ January and April 2010 data is missing.

C. Guided Climbing and Technical Mountaineering Limited CUA Pilot

In April 2014, in order to test the demand for guided climbing and mountaineering outside of the current concessioner, the ROMO Concessions team released four guided climbing and technical mountaineering CUAs with 15 client-days to use in 2014. Twenty-six companies expressed interest in the CUA and 19 completed the application. The Concessions team used a lottery to select four companies: ClimbingLife Guides (a climbing guide company in Estes Park, CO), Acadia Mountain Guides (a climbing guide company based in Maine), Green Jeep Tours (a tour company in Estes Park, CO), and Outpost Wilderness Adventures (an outdoor guiding company from Lake George, CO). Refer to Appendix C for the limited CUA permit.

As of July 2014, the companies had booked/used the following number of client-days:

All companies except Green Jeep Tours express confidence they will use all 15 of their days this year, potentially as soon as August. Two primary obstacles prevent Green Jeep Tours from booking its days: 1) no climbing guides on staff and no previous experience serving climbing clientele, and 2) clientele that generally book guided activities for

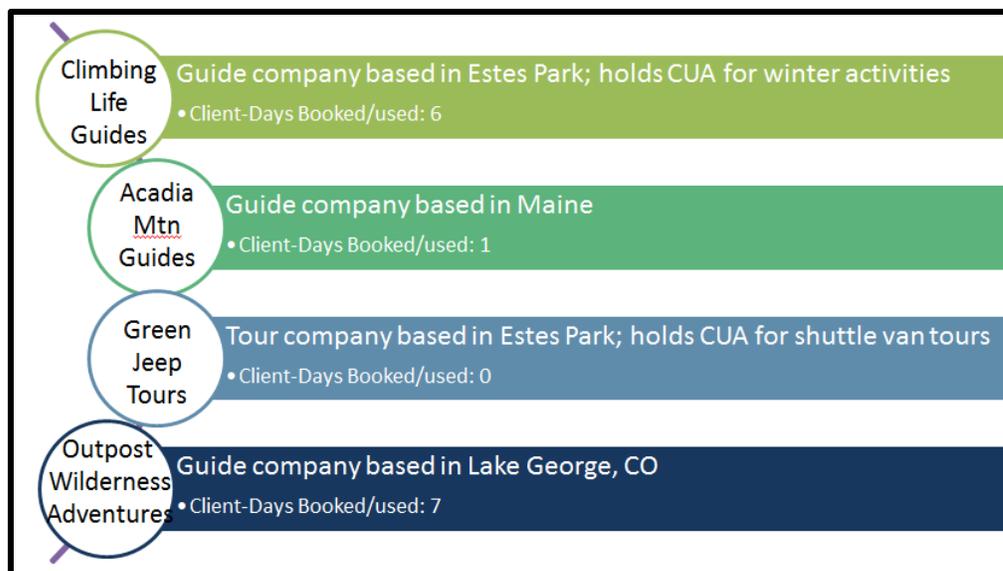


Figure 20: Limited Climbing CUA Pilot

the next day, a period much shorter than the

one-week window required by ROMO's CUA permit. The park requires limited CUA holders to book their client-days a minimum of 6 days in advance so that the concessioner can plan accordingly.¹²

The limited CUA pilot demonstrates that demand for guided climbing exists beyond the current concessioner, potentially due to guided climbing companies having existing relationships with loyal clientele that do not seek to climb with CMS. Repeat customers in the climbing and mountaineering industry commonly form trusting relationships with a particular guide and desire to climb with the same guide on all their trips. The new CUA holders can now offer ROMO as a destination to their existing customers, who were unlikely to be reached by CMS' marketing.

All of the companies that received a CUA expressed satisfaction with the limited CUA opportunity. Of the applicants that did not receive a CUA, some pointed to an unclear application process and a selection process that was not transparent or fair. A number of them expressed disappointment that a touring company with no prior guided climbing experience would receive a guided climbing and technical mountaineering CUA.

The key insights from the limited CUA pilot include:

- There is additional demand not served by the current concessioner.
- It will take time for any new guided climbing and technical mountaineering permit holder to scale their business in the park.
- The park should require any prospective permit holder to have qualified climbing guides already on staff.
- A one-week booking window can cause problems for companies in some, but not most, cases.

¹² Early in the process, they requested that the park change the requirement to book trips from two weeks ahead of the trip to only one week to better match the needs of their clients. The park promptly responded and made the change.

- The application and selection processes need to be straightforward, transparent, and fair, but not overly burdensome to the prospective permit holders or the park.



The Diamond, NPS Photo, July 1983.

VII. Evaluation of Future Guided Climbing and Technical Mountaineering Commercial Service Strategy

A. Market Analysis

This Commercial Services Strategy effort included research on the climbing market, the guided climbing industry, and the customer market for guided climbing at ROMO and the Front Range. The exact size of the market for guided climbing at ROMO is challenging to quantify due to a lack of information and the potential for a client base that extends across the US and world. However, some relevant quantitative and qualitative insights about the guided climbing market emerged during the development of the CSS.

Key insights:

- Climbing participation and the climbing industry have both grown significantly in the last two decades and will continue to grow
- ROMO may see only a small portion of this growth
- Guided climbing clients at ROMO have a variety of needs and skill levels
- Repeat business comprises a significant part of guiding climbing
- Clients form long-term relationships with particular guides
- No consensus exists on certification requirements for guides at ROMO

Climbing Participation Analysis

Once a fringe sport, climbing has grown tremendously in the last three decades and is now considered more mainstream and commercial. Community climbing organizations like The Access Fund (10,000 members) continue to thrive, while new climbing organizations, such as Boulder Climbing Community are being founded.

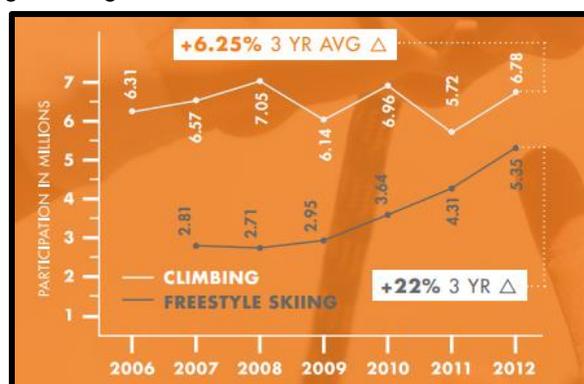


Figure 21: Outdoor Participation by Activity

Much of the growth is attributable to the increase in indoor climbing, which has a greater focus on fitness and exercise than outdoor recreation. While few people who climb in gyms transition to the outdoors, outdoor climbing also continues to grow. The American Mountain Guides Association estimates that outdoor climbing has grown an average of 3% per year over the last three years to a 6.78 million participants annually.¹³ ROMO has relatively advanced terrain that requires traditional climbing skills, meaning that only a fraction of outdoor climbing growth translates to growth in climbing at ROMO. Much of the growth in outdoor climbing is due to bouldering, an activity that has gained increasing popularity given it requires less technical knowledge and does not necessitate a partner. For the same reasons, bouldering is unlikely to drive growth in the guided climbing market at ROMO; none of the 19 CUA applicants expressed interest in guiding bouldering.

CMS currently uses an average of 636 client days for climbing annually, an average that has remained steady in recent years. Similarly, Arapaho National Forest (Boulder Ranger District) reported an three-year average of 653 guided climbing client days between their two priority permit holders and one temporary permit holder (limited to 30 days). In Arapaho National Forest (Canyon Lake Ranger District), one priority company consistently uses all of its allotted 352 client days per year and has requested more (note: they have not been granted this increase due to a moratorium on new permits in this district). Despite limited data points, these numbers suggest that ROMO's guided climbing market is larger than what the sole concessioner is serving. However, the market is not substantially bigger than that of the current concessioner, even if there were more guided climbing businesses are allowed to operate within the park. The purpose of allowing new businesses

¹³ AMGA State of the Guiding Industry Report, 2013.

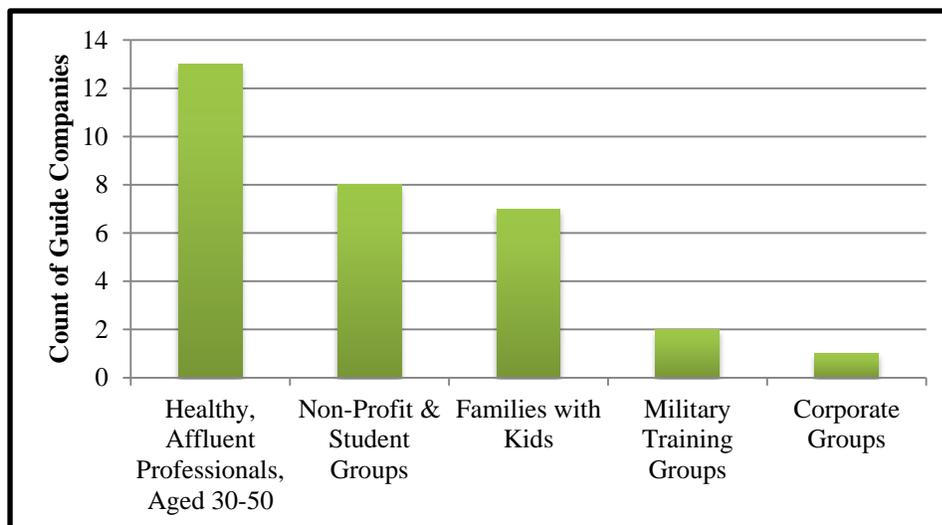


Figure 22: Who are the target guided climbing customers?

access to the park would primarily be to offer more competition and customer choice. Compared to expected growth in total climbing, commercially guided climbing will likely grow relatively slowly in future years.

Customer Profile Analysis

Guides described their climber customers in the Front Range as falling into three main groups:

- 1) *Healthy affluent professionals* – aged 30-50, mostly male, with higher levels of disposable income, and characterized by a variety of skill levels, a very goal-oriented approach, and a desire to climb certain objectives;
- 2) *Non-profit and student groups* – typically novice skill level, and characterized by larger group sizes that cannot afford to pay guide rates and thus need guides who will work pro-bono;
- 3) *Families with children* – these families desire a fun safe day at the park, typically at the beginner skill level.

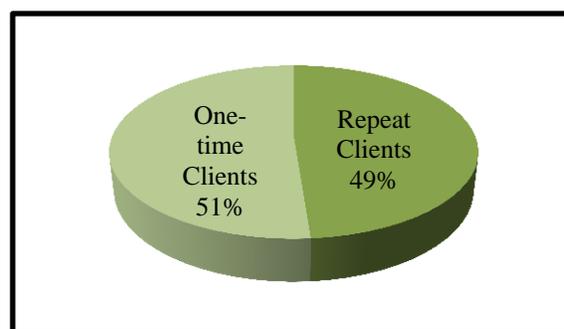


Figure 23: What is the mix between one-time and repeat clients?

Customers often form relationships with certain guides based on trust and a functional climbing partnership, and prefer to climb only with that guide. Therefore, a significant part of a guide's livelihood depends on repeat business, particularly for more experienced guides. Many non-profit and student groups charge only what is required to cover the cost of the trip and cannot afford to pay daily guide rates (typically several hundred dollars/person/day) and need guides essentially work pro-bono. Under the

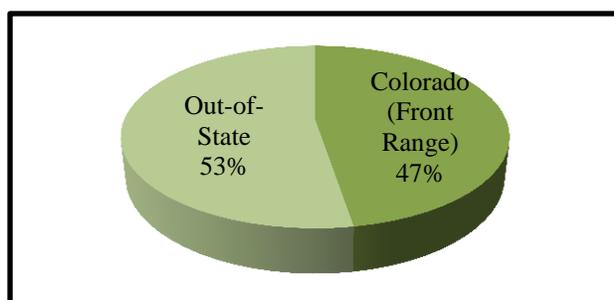


Figure 24: Where are your clients from?

current system, these guides must go through the current concessioner, and are not guaranteed they will be able to plan an affordable trip with the concessioner. Many stakeholders provided feedback during the CSS process, particularly during the public meeting, that they are not able to get the access they desire through the current system.

Industry Analysis

The climbing industry has grown and matured significantly over the past twenty years, and is expected to continue in that trajectory. While few, if any climbing gyms existed in Colorado in the early

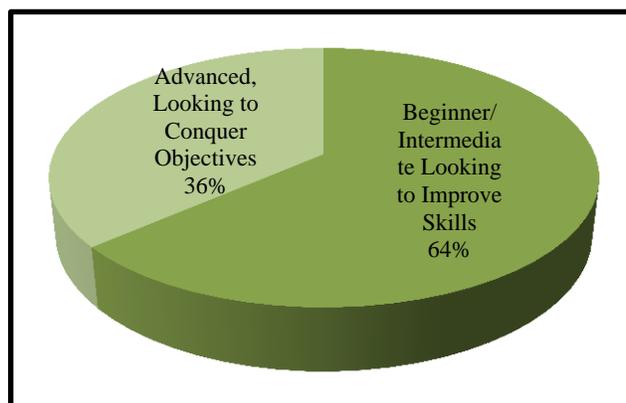


Figure 25: What is the skill level of your clients?

90s, over 50 climbing gyms can be found throughout the state. There are also at least 35 guided climbing companies in the Front Range (see Appendix D for data by city). The climbing guide and gear industry has grown at 10% annually, even during the recession¹⁴. The American Mountain Guides Association (AMGA) reported over 3000 members in 2014, a 5% increase over the previous year.

What Guide Companies Want at ROMO

As a part of the market analysis, all CUA applications were reviewed and all companies who expressed interest were contacted, ultimately leading to 16 interviews. These interviews helped the park better understand the guiding

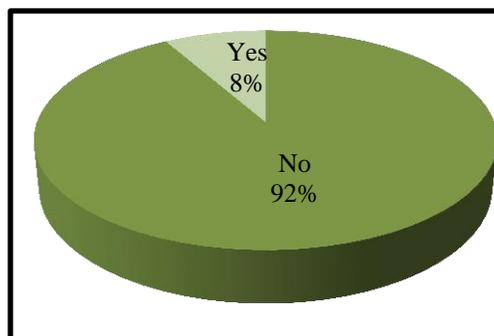


Figure 26: Have you used CMS's guest-guiding program?

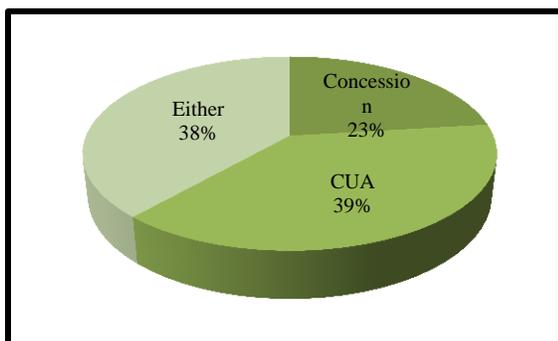


Figure 27: What authorization would you prefer at RMNP?

ROMO; companies would incur mostly the marginal costs associated with each guide trip provided.

Guides prefer obtaining their own permit over a guest-guiding program. Guest guiding, which requires formally becoming an employee of the concessioner, is expensive and time-consuming for the concessioner, and the guest guide receives a much lower wage than they would if they had guided on their own.

businesses and what companies might want in to see in a guided climbing strategy at ROMO.

Guiding companies typically hold permits at multiple areas and operate by guiding at these diverse locations, sometimes across the country. These companies do not view ROMO as the sole location where they would operate their business. Rather, they view ROMO as an additional location to offer their customers among a menu of geographic options. The vast majority of guides would not want a building in ROMO or in Estes Park, and thus, would not require a large up-front investment to begin guiding at

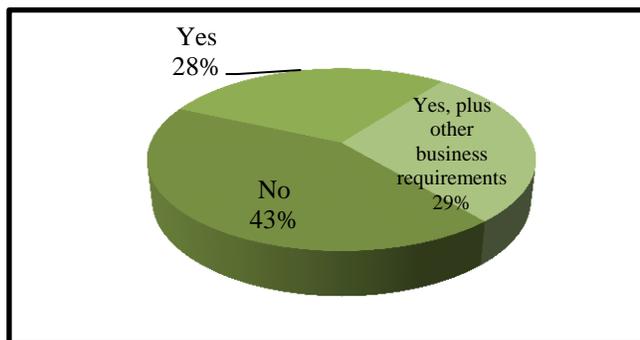


Figure 28: Should certification be required to guide at RMNP?

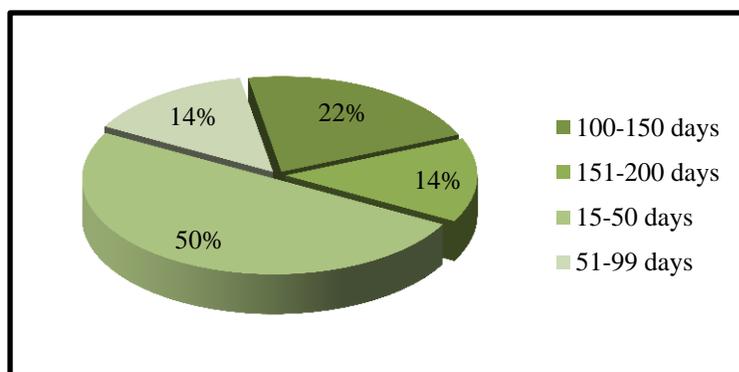


Figure 29: How many client days do you want at ROMO?

Guides state that they could serve between 15 and 200 climbing days annually at ROMO, with an average of 65 days. More than half of guides interviewed want 50 days or less. The majority of guides would be content with either a concession or CUA climbing authorization.

While guides advocate strongly for providing access to ROMO for only high quality guides, there was no consensus on how to define those qualifications, whether it was individual certification, business accreditation, years of experience, a robust operating/risk plan, or

¹⁴ American Mountain Guide Association *State of the Guiding Industry Report*, 2013.

experience/certification in a specific type of terrain. AMGA certification came up most frequently, but was very controversial.

Guides mostly want to guide in areas that see currently see commercial climbing with CMS and most frequently request access to Longs Peak and Lumpy Ridge.

Community Engagement Feedback

Through engaging the public through public meeting, an online public comment form, and interviews with climbers and climbing organizations (non-guides), these key insights were collected:

- Climbing is growing in popularity and becoming a more mainstream activity.
- The guiding industry is also growing and is becoming more professional and standardized, particularly through the training and certification process associated with the American Mountain Guides Association.
 - Private climbers and professional guides share the desire for the park to expand visitor choice by opening access to more than one concessioner.
 - Private climbers and professional guides share the same concerns as park staff about protecting the wilderness and preventing overcrowding on routes. They want the park to balance private- and commercial-use,

“People deserve the right to choose which qualified guide service they choose to use.”

- especially on intermediate and popular routes where crowding is more likely to occur.
- The vast majority want the park to ensure that guides with access to the park are experienced and highly qualified in order to promote safety and quality experiences on park resources.
- At the same time, there is no consensus on whether or not the park should require certification for guides who work within the park. While AMGA certification is becoming the industry standard, there remain many guides who are highly qualified but are not certified due to the time and financial investment that the certification process requires.
- Both private climbers and professional guides strongly believe that greater guide presence in the park will help to promote stewardship and the protection of the wilderness resources.
- Both communities desire a deeper partnership with the park to actively engage in the maintenance and enhancement of the wilderness experience.
- The professional guiding community universally agreed the guest-guiding program as designed by the park in the current concessioner’s contract is not financially feasible and does not work.
- Finally, outdoor recreation and non-profit groups advocated strongly that students and youth need access to permitting options separate from commercial providers because they are unable to pay market rates.
- All input that was received through the community engagement process was incorporated into the park’s market analysis, evaluation of alternative models, and final decision. A full summary of the online comments is available in Appendix B.

“Stewardship is an important part of guided climbing - just being in the company of an experienced guide will help “infect” the climbing community with a good sense of stewardship...”

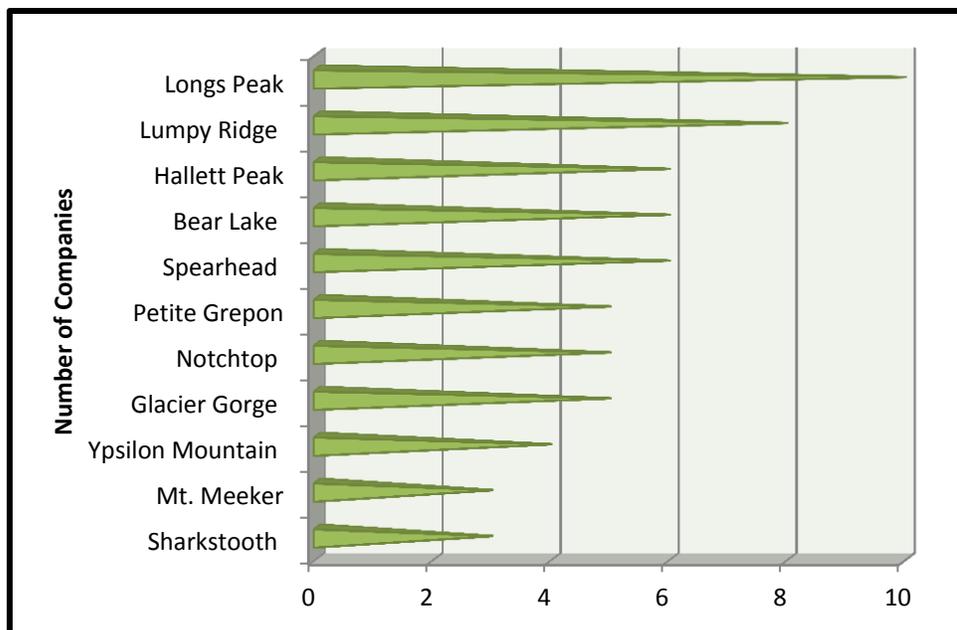


Figure 30: Requested Areas for Guided Climbing in Limited CUA Pilot Applications

Guided Climbing Models at Other Parks

Other land agencies use a variety of models to manage guided climbing. From interviewing or reviewing the models of nine other parks/ agencies, three key insights emerged:

- National parks have been moving away from a single concession model to multiple concession models.
- State and regional lands have minimal limitations on commercial use.
- Though they do not limit the number of CUAs, the number of climbing CUA holders at Eldorado Canyon State Park (12) and Boulder County Open Space (20) is in a similar range to the number of CUAs that ROMO has for other activities.

Parks that have significant climbing activity or similar terrain to ROMO were prioritized. The following is a full list of the public lands that were consulted:

- Mount Rainier National Park, *NPS, Washington*
- Denali National Park, *NPS, Alaska*
- North Cascades National Park, *NPS, Washington*
- Black Canyon of the Gunnison National Park, *NPS, Colorado*
- Red Rocks Canyon National Conservation Area, *BLM, Nevada*
- Arapaho-Roosevelt National Forest, *USFS, Colorado*
- **Eldorado Canyon State Park**, *State of Colorado, Colorado*
- **Boulder County Open Space**, *Boulder County, Colorado*
- **Jefferson County Open Space**, *Jefferson County, Colorado*

Park Name	Concessions	Unlimited-Use CUAs	Single Trip CUAs	Insurance	Workers Comp	Certification
Mt. Rainier National Park	3 (10 yr each)	—	15 (2 yr CUAs, single trip per year)	Concessions: \$300,000; CUAs: \$1M	Yes	Yes, or equivalent
Denali National Park	6 (10 yr each, exclusive use of old park area)	Unlimited (9 in 2014, restricted to the new park area)	—	Concessions: min \$500,000 per Occurrence; CUAs: Up to \$1M per Occurrence depending on party size	Yes	Yes, or equivalent
North Cascades National Park	—	Unlimited	—	\$500,000	—	—
Black Canyon of the Gunnison National Monument	—	5 CUAs	—	—	—	—
Red Rock Canyon National Conservation Area	5 (on-going)	—	12 (8 commercial, 4 educational)	\$500,000 per Occurrence, \$1M Aggregate	No	No
Eldorado Canyon State Park	—	Unlimited (approx 12)	Unlimited	\$150,000 per Occurrence, \$600,000 Aggregate	—	Yes, or equivalent
Boulder County Open Space	—	Unlimited (approx 20)	Unlimited single-use and Unlimited 50 day permits	\$1M per Occurrence, \$2M Aggregate	—	No
Agency Name	Ranger District	Priority (> 1 year)	Temporary (<6 months)	Insurance	Workers Comp	Certification
Roosevelt/ Arapaho National Forest	Boulder	2 (Unlimited user days)	1 (30 day limit at Ironclads)	—	—	No
Roosevelt/ Arapaho National Forest	Canyon Lakes	1	1 (180 day limit)	\$300,000	—	No

Figure 31: Summary of Permitting Models Used by Other Public Land Management

B. Four Strategic Alternatives for Guided Climbing and Technical Mountaineering Commercial Services

Limited-Trip CUAs

Under any of the following four recommended alternatives, the park will pursue adding the option for limited-trip out-of-park CUAs. Limited-trip CUAs will be granted by the park to any qualified company to lead a guided climbing trip in the park once per year. The park will ensure that any applicant for a limited-trip CUA meets minimum insurance, stewardship, and safety requirements before receiving the permit. Limited-trip CUAs will replace the existing guest-guiding program. Please refer to the Implementation section of this report for additional details.

Benefits of Limited-trip CUAs over the guest-guiding program include:

- Removing the concessioner as “gatekeeper” for additional guiding in the park and allowing ROMO to directly control this process.
- Improving opportunities for visitors who have an existing relationship with a certain guide to climb with their preferred guide.
- Providing access to ROMO to individual guides, companies, non-profits, and academic groups that do not successfully obtain concessions contracts.

Alternative 1: One Concession Contract and Limited-Trip CUAs

This option provides an improved opportunity for visitors while maintaining the status quo of a single category III concession contract. Guided climbing use under this option would increase only by the amount of activity permitted under limited-trip CUAs.

Benefits	Concerns
<ul style="list-style-type: none"> • Enables a long-term relationship with higher stewardship potential • Minimal additional wilderness impact because guided climbing activity would likely increase the least among alternatives • Franchise fee can be used for park projects relevant to climbing, such as mitigating resource impact or funding climbing rangers 	<ul style="list-style-type: none"> • Lowest level of competition and choice for visitor • Limited opportunity to collect data on market • Perceived as most inequitable option by guide companies • Concessioner could become complacent without competition • Preferential right makes it hard for other companies to compete • Concessions must pass a financial feasibility analysis • Challenge to design a defensible selection process for a specific number of concessions

Alternative 2: Six Category III Concession Contracts and Limited-Trip CUAs

This option provides expanded visitor choice while changing the structure of guided climbing incrementally. For the six concessioners there are no limits on user days or routes. As opposed to the typical contract duration of ten years, the park recommends using five-year contracts for the first round to test the model, and then re-evaluate the authorization structure and number of concessions at the end of year four. For a detailed methodology on the number of concessions and models of use, see Appendix E. In general, total climbing and the mix of guided climbing vs. private climbing was not sensitive to the number of concessions.

Benefits	Concerns
<ul style="list-style-type: none"> • Solid but incremental change with flexibility for future changes • Longer relationships with higher stewardship potential • Franchise fee can be used for park projects relevant to climbing, such as mitigating resource impact or funding climbing rangers • Park retains some control of selection process • Selection process is supported by the Region • Less frequent rebidding process than CUAs 	<ul style="list-style-type: none"> • Longer selection process than CUAs; more administrative burden on park and applicants • Challenge to design a defensible selection process for a specific number of concessions • One company may win all concessions, eliminating visitor choice • Concessions must pass a financial feasibility analysis • Preferential right makes it hard for other companies to compete

Alternative 3: Six CUAs and Limited-Trip CUAs

Similar to the option above, this option allows for six companies to have unlimited access to the park, but uses out-of-park CUAs instead of concessions contracts. CUA duration would be two years. For detailed methodology on the number of CUAs, see Appendix E.

Benefits	Concerns
<ul style="list-style-type: none"> • Good fit for industry business models that require inholdings • Least burdensome upfront application and bidding process; no financial feasibility analysis • Frequent opportunities to adjust model based on data and feedback • Park retains some control of selection process 	<ul style="list-style-type: none"> • Companies have less certainty whether their permit will be renewed every two years • Shorter relationships have potential for less partnership • Challenge to design a defensible selection process for a specific number of concessions • Administrative burden is high with reissuing CUAs every two years

Alternative 4: Limited Use CUAs and Limited-Trip CUAs

This option provides the most market-driven approach, allowing any qualified company to obtain an out-of-park CUA, but with a limit on the number of client-days each CUA can use in the park. These limited use CUAs would be priced higher than limited-trip CUAs to account for the different levels of access. CUA duration would be one to two years. Though this is the most open alternative, it provides a more conservative approach than the park's currently strategy for managing CUAs on all other activities, which are unlimited by number and do not place limits on client-days. Stringent standards for applicants can help promote safety and stewardship, but would be harder to ensure than during a concession/CUA bidding process.

Benefits	Concerns
<ul style="list-style-type: none"> • Maximizes visitor choice • Market determines price and illustrates quality of service • Can incrementally increase client-days based on data and feedback • Most equitable access to guide companies 	<ul style="list-style-type: none"> • Administrative burden is high with reissuing CUAs every two years • High monitoring burden with many CUAs and use limitations • Potential for increasing wilderness impact of many different companies; mitigated by limits on user days • Possibly caps current concessioner's business below current levels, reducing guided climbing activity in the short run • Harder to ensure high quality of service

C. Decision Framework

The park evaluated the strategy alternatives based on four key criteria, which synthesize all the primary themes generated from stakeholder feedback.

- **Visitor Experience:** Enhances the visitor's experience by offering choices for a safe and high quality service at a reasonable price. Increased competition helps foster quality and safety at a fair price. This also includes balancing the visitor experiences of both private and guided climbers.
- **Resource and Wilderness Impact:** Preserves or enhances the park's wilderness character, particularly through partnering with guides to practice and educate about minimal impact climbing techniques and collect data. It enables the park to measure the full impact of guided climbing, putting the park in a better position to analyze the need for use limits in the future.
- **Stewardship:** Any potential permit holder is a high quality and safe business that is capable and equipped to incorporate the park's interpretative themes as part of its services.
- **Ability to Manage & Collect Data:** Strategically utilizes park staff and resources to manage, and improves the ability of the park to collect data about the market for guided climbing.

D. Recommended Strategy

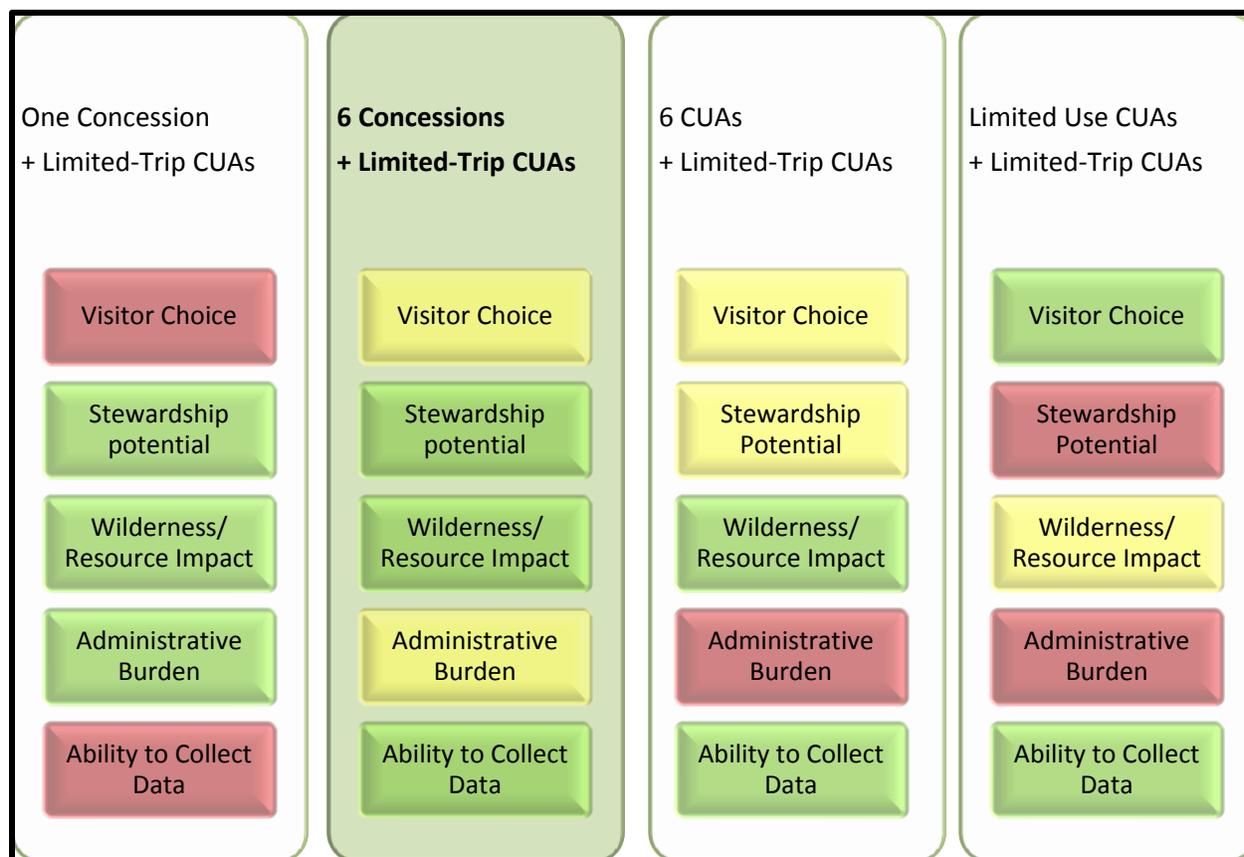


Figure 22: Strategy Analysis. Red= Worst Conditions, Yellow = Medium Conditions, Green = Best Conditions

By comparing the alternatives on these criteria, the park recommended Alternative 2: 6 category III concession contracts with limited-trip out-of-park CUAs. This model balances the priorities of various stakeholders, while

minimizing the risk to the park.

Under this alternative, the park forecasts total client-days for guided climbing and technical mountaineering to grow by 118%, increasing total climbing by only 0.4%. Guided climbing and technical mountaineering remain at less than 1% of total climbing (0.7%). While visitors get improved choice and quality of service through competition, climbing use is forecasted to increase only incrementally. A manageable number of longer-term partnerships offer a strong opportunity to improve stewardship and protect the wilderness, while also mitigating the administrative burden to park staff. The park plans to proceed conservatively on the number of concessions or CUAs, as it is more feasible to increase the number of partnerships than to decrease the number. For a detailed methodology for the number of concessioners, see Appendix E.

Concessions contracts should include the following required activities: rock climbing, ice climbing, technical mountaineering, non-technical mountaineering, ski mountaineering, bouldering and technical climbing courses.

Potential Fee Comparison

Our analysis indicates that all four options would generate similar levels of fees for ROMO, with Option 2 having the greatest revenue potential, and Option 3 having the smallest.

	Option 1	Option 2	Option 3	Option 4
Single Trip CUAs	\$ 4,000	\$ 4,000	\$ 4,000	\$ 4,000
Franchise Fees	\$ 6,750	\$ 8,712	\$ -	\$ -
CUA Permits	\$ -	\$ -	\$ 1,800	\$ 6,000
Event Booking Fees	\$ -	\$ -	\$ -	\$ -
Total	\$ 10,750	\$ 12,712	\$ 5,800	\$ 10,000

Figure 32: Estimated Average Fees

E. Enhancing Choice through Competition

Although the National Park Service has traditionally preferred single operators for most concession services, exceptions are abundant. Exceptions include guided mountaineering companies at Mount Rainier National Park and Grand Teton National Park, cruise ship operators in Glacier Bay National Park, air taxis in Denali National Park, river runners in Grand Canyon National Park, and river outfitters on the Ozark and Buffalo national rivers.

One of the goals of the Commercial Services Strategy has been to create more choice in guided climbing and technical mountaineering commercial services for park visitors. Through the public and internal planning process, it became clear that there are a variety of climbing styles, philosophies, instructional techniques, services, and climbing ethics offered by guide companies. Multiple service providers, attracting market share through competition, would likely employ many different styles and techniques for their services and would serve different customer segments. A larger number of respondents to the public online comment form (98%) identified the need for competition and only 2% of respondents supported continuation of the sole concessioner model. Experiences might include differences in the following:

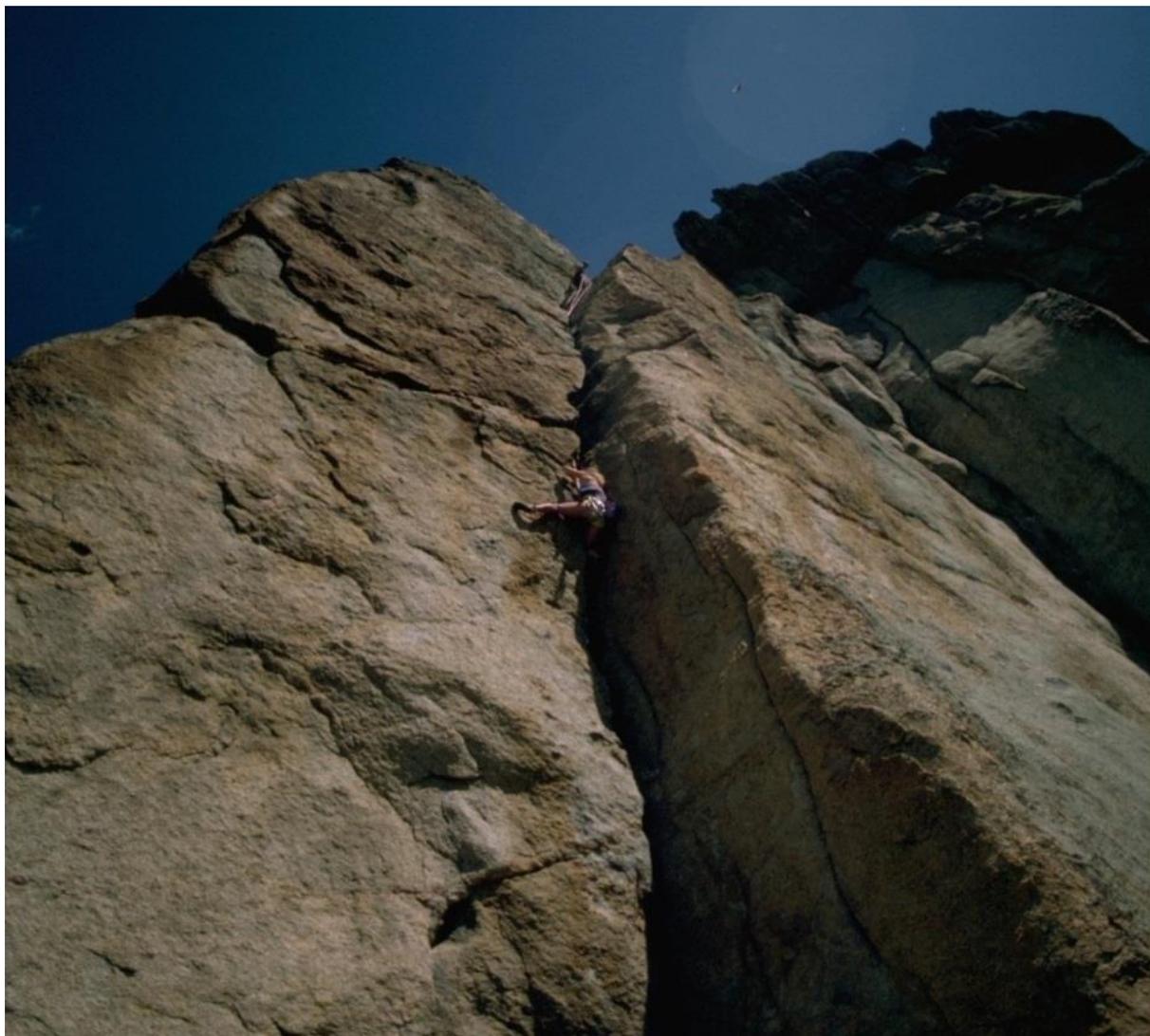
- Scheduling (various days of the week or seasons)
- Pace (number of hours or trip lengths)
- Party size (varying numbers of people in a climbing party)
- Food and supplies (varying services to clients)
- Training (enroute or single or multiple days beforehand)
- Climbing emphasis (offering clients a variety of experiences including environmental education trips, timely achievement of a climb, family-style outings, etc)

Offering park visitors a variety of climbing and technical mountaineering experiences would likely result in the

opportunity for greater visitor satisfaction. Clients would be able to select from a variety of styles provided by different companies. This advantage was identified by public comments. The public outreach process made it clear that no single program or guide service can be expected to fulfill every client's needs or expectations.

Offering six guide service opportunities in the park will set the stage for market share competition. Concessioners, therefore, would likely focus on the objectives for their prospective clients to differentiate themselves from other guide companies to remain competitive. Potential clients could research the providers to select that company that would best meet their individual needs. Because competitive environments lead to a great ability to meet the needs of individual clients, visitor experiences in the park are likely to become better and result in some rate differences among providers, furthering visitors' satisfaction with their park experience.

Past history with multiple concessioners in Mount Rainier National Park and Denali National Park has shown that visitor experience satisfaction may increase by offering a variety of service providers.



Jamming on Tiger's Tooth, Twin Owls, NPS, 1987.

VIII. Implementation Recommendations

During the research and decision-making processes, a number of implementation questions arose.

This section first details the implementation process for limited-trip CUAs and second, clarifies several definitions of climbing and technical mountaineering: hiking, ski mountaineering, and avalanche classes. Lastly, this section provides a number of other recommendations that will strengthen the implementation of this strategy, including the communication plan, data collection process, scheduling, engagement of the climbing community, standards for vetting climbing companies, and other details.

A. Limited-Trip CUAs for Guided Climbing and Technical Mountaineering

As discussed earlier, one purpose of the limited-trip CUA program is to replace the current guest guiding program with a more financially feasible model for both guides and clients. The limited-trip CUA program will also give access to clients who desire to climb in the park with a specific guide outside of CMS. Finally, the limited-trip CUA program will give limited access to guided climbing groups (such as educational and non-profit groups) that cannot reasonably access the park through a commercial concession.

Under concession contracts the concessioners are expected to have the opportunity to make a reasonable profit. Therefore, the use of CUAs needs to be limited to maintain this business opportunity.

Permitted activities under the CUAs include: rock climbing, ice climbing, technical mountaineering, non-technical mountaineering, ski mountaineering, bouldering and technical climbing courses.

Limited-trip CUA holders will be held to the same selection standards and requirements as concessions contract holders, including insurance requirements, guide to client ratios, and safety protocols.

Limited-Trip CUAs: Details

- Duration of the Permit: Annual
- Maximum Length of Stay in the Park: 3 calendar days
- Maximum Group Size: 12 clients
- Maximum Guide to Client Ratio:
 - Simple technical skills classes 1:6
 - Single pitch terrain 1:5
 - Multi-pitch rock climbing 1:2
 - Basic alpine terrain 3:1
 - Advanced alpine terrain 2:1
- Ski terrain 1:5 to 1:2, as difficulty increases
- Requirements: Same as the concessions implementation guidelines

Limited-trip CUAs will be available annually to qualified climbing guides and will allow three calendar days of climbing in the park. The three days authorized under the CUA need not be consecutive but must occur within the calendar year during which the permit is obtained. CUA holders will be expected to adhere to the same group size and guide to client ratio guidelines as the concessioners.

Applications for limited-trip CUAs must be submitted a minimum of one month in advance of an anticipated trip.

Approved limited-trip CUA holders will be required to schedule (formerly referred to as “booking”) their trips at least 24 hours in advance on the shared park commercial climbing calendar. Scheduling posts require the name of the company, intended activity, date, start and end times, location, number of clients, and contact information for the guide in the field. The park requests that the scheduling of trips takes place as soon as a trip is confirmed (planned trips should not be added to the calendar until they are confirmed).

Limited-trip CUA holders are also required to complete a post-trip report within 30 days of completion of a visit to the park (available in Appendix G). If the CUA holder makes more than one visit to the park on non-consecutive days, post-trip reports must be completed for each visit separately.

For limited-trip CUAs, the park will pursue a different cost of recovery fee than a traditional CUA. The two main changes include 1) reducing the number of hours of administration by the Concession Management Specialist from 5 hours to 3 hours given it is only a single trip and 2) adding monitoring hours for a climbing ranger. Depending on the number of hours assumed for a climbing ranger, the CUA price ranges from \$275 to \$330 (see Appendix F).

B. Definition of Climbing and Mountaineering Services

Defining Technical Mountaineering vs. Hiking

During the stakeholder interview process, the issue of the use of technical gear by hiking and backpacking CUA holders came up with both internal and external parties. Currently, hiking and backpacking CUA holders are prohibited under the current concession contract for guided climbing from using any technical gear, such as helmets, rope, ice axes, and crampons, during their commercial visits within the park. The goal of this policy is to separate “non-technical” activity authorized under a CUA from “technical” activity authorized only under the current guided climbing concessions contract. Some CUA holders seek to utilize technical gear for the safety of their clients on challenging terrain such as the Keyhole Route on Longs Peak. Exemptions to the prohibition were being given on an ad hoc basis to those CUA holders that made such requests.

The Keyhole Route on Longs Peak is popularly considered a Class 3 climb. A Class 3 rating, according to the Yosemite Decimal System, describes a route that includes scrambling or un-rope climbing, but where ropes may be used for comfort and safety. For the safety of the visiting public, the park clearly identifies the Keyhole Route as a climb, not a hike. However, the park does not require the use of any specific technical gear on the route.

Longs Peak typically experiences a six week window annually from mid-July to late August during which is snow-free. While one may successfully complete a Class 3 route, such as the Keyhole Route or Loft Route, without technical gear during this window, it may still be necessary. For example, on July 31, 2014, the ROMO Backcountry Office released a Keyhole Route Conditions update reporting “significant snowfall and ice on the route past the Keyhole.”

The Concessions team should classify the Keyhole route and others of similar levels of difficulty, such as the Loft Route, as climbs that require technical mountaineering skills. For the safety of the visitors, it is most appropriate to limit the guiding of such routes to only those provide services under a guided climbing and technical mountaineering concessions contract or Single-Trip CUA. Hiking and backpacking CUA holders should remain prohibited from using technical gear unless explicitly approved by ROMO concessions staff on a case by case basis.

Including Ski Mountaineering in Climbing and Technical Mountaineering

In historical concessions contracts, ski mountaineering was not included as a required or authorized activity. Ski mountaineering is differentiated from ski touring by travel over any part of a mountain, including significant rock, ice, or glacier sections, in order to make a descent. In addition to skins and crampons for traction, ski mountaineers may use crampons, ice axes, ropes, or other technical equipment in order to reach otherwise inaccessible points. In future contracts, ski mountaineering should be included as a required activity. While ski touring should continue to be permitted in the Winter Activities CUA, ski mountaineering should not.

Yosemite Decimal System

Class 1: Hiking

Class 2: Simple scrambling, with the possible occasional use of the hands

Class 3: Scrambling; a rope might be carried

Class 4: Simple climbing, often with exposure. A rope is often used. A fall on Class 4 rock could be fatal.

Typically, natural protection can be easily found

Class 5: Where rock climbing begins in earnest. Climbing involves the use of a rope, belaying, and protection (natural or artificial) to protect the leader from a long fall. Fifth class is further defined by a decimal and letter system – in increasing and difficulty. The ratings from 5.10-5.15 are subdivided in a, b, c and d levels to more precisely define the difficulty (for example: 5.10a or 5.11d)

From Climber.Org:

<http://www.climber.org/data/decimal.htm>

C. Avalanche 1 Classes

During the process of interviewing stakeholders regarding the climbing and technical mountaineering concessions, an additional area of concern arose – the abundance of avalanche 1 classes taking place in the park during the winter season.

With the rise in the popularity of backcountry skiing along the Front Range, the demand for avalanche 1 courses has also grown rapidly. As skiers seek to explore more remote mountainous terrain, knowledge of snow safety is critical. ROMO's landscape is well suited for teaching about snow and avalanche safety, in addition to its close proximity to population centers along the Front Range. Finally, the popularity of avalanche classes at ROMO has further increased due to the U.S. Forest Service's decision to cease permitting operators to use premier terrain such as Berthoud Pass as of November 2013.

In the park, avalanche 1 classes take place in two main areas: Bear Lake and Hidden Valley. During the winter weekends these areas are also highly popular for skiing, sledding, snowshoeing, and more. The classes are generally 2 or 3 days and run on the weekends where approximately 40% of the coursework is done in a classroom and 60% is done in the field. Classes have a maximum of 15 clients.

Currently, avalanche 1 classes are an authorized activity under the climbing and technical mountaineering concessions contract as well as the winter activities CUA permit. Only the climbing and technical mountaineering concessioner is permitted to run more advanced level avalanche courses.

In addition to CMS, the climbing and technical mountaineering concessioner, 5 of the 14 winter activities CUA holders currently offer avalanche 1 classes in the park. In 2014, CMS has already spent 873 client days in the park for avalanche classes, much more than their average 636 client days for rock climbing and other required and authorized activities. All six operators combined, an estimated 1755 client days of avalanche classes took place in the park in 2013. Assuming all classes held were at their maximum capacity and were consistently spread throughout the winter, an estimated 3.6 classes occurred in the park during each winter weekend (January, February, March, and December). Park staff estimate that on popular weekends as many as 8 to 10 classes occur simultaneously.

Estimated User Days By Year	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004	2003
Alpine World Ascents	.	48	56	152	172	0	.	88	84	140	130	180
ApexEx	.	480	142
ClimbingLife Guides	.	266	111	222	107	74
Colorado Mountain School	873	858	875	654	202	510
Renaissance Adventure Guides	.	104	100	140	184	168	126	88
Total	.	1755	1284	1168	665	752	126	176	84	140	130	180

*Boulder Mountain Institute is a new 2014 CUA holder that intends to provide avy training but has not yet held any courses within ROMO.
 **Alpine World Ascents did not pursue a winter activities permit in 2009 as all of their avy classes were held on USFS land.
 *** "." indicates missing data.

Figure 33: Estimated User Days for Avalanche Classes by Year

Both park staff and operators express concern about overcrowding caused by avalanche classes. In addition to operators jockeying for spots in Bear Lake and Hidden Valley, potential dangers arise as some operators choose to run classes in the middle of the ski and sledding hills and fail to fill in their snow pits at the end of the day.

While park staff believes that the quantity of avalanche classes occurring has already hit its maximum threshold, they recognize the critical value of avalanche education for increasing the safety of visitors to the park. Park staff argues that the park should continue to work to promote avalanche education, not limit it. There is also a sense that the popularity of backcountry winter activities will plateau in the next few years and that subsequently the growth in avalanche courses will begin to stabilize as well.

Instead of tying avalanche training to the climbing and technical mountaineering concession contracts, staff recommends the following approach, beginning this winter 2014-2015:

- Maintain avalanche training as a permitted activity under the winter activities CUA.

- Require that all operators offering avalanche courses (CUA holders as well as concessioners) pre-book their courses with the park through a shared-calendar.
- Require that all winter activities CUA operators provide complete post trip reports for all of their activities, including the date of the activity, start and end times, number of clients served, type of activity, and location(s) of activity.
- Request the following of all operators offering avalanche courses:
 - Stagger class times throughout the day.
 - Fill in snow pit holes.
 - Disperse use by moving away from popular sledding and skiing areas. Profiles should not be built right on the edge of the main area.
 - Offer classes on the weekdays when fewer visitors will be present.
 - Wear gear with the logo of the operator clearly displayed so that rangers can identify the group.
 - When the current climbing and technical mountaineering concessions contract ends, remove avalanche training as an authorized activity before rebidding the contracts.
- As soon as possible, permit winter activities CUA holders to offer higher level avalanche courses in order to help disperse use given that avalanche 2 and 3 courses require different terrain than avalanche 1 courses.
- Review trip data at the end of the season to determine usage. If a cap on usage is required because popularity of the courses continues to grow, then:
 - Split avalanche education into a separate CUA from the winter activities CUA.
 - Determine a maximum limit on the number of user-days for avalanche courses based on the 2013 and 2014 data.
- Require applicants for the avalanche education CUA to apply by a pre-determined date before the start of the season.
- Split the total number of user-days across all eligible applicants and require them to continue submitting post-trip reports.



Hiking into the Loch, by John Marino, February 5, 2012.

D. Communications and Roll-out Plan

The Regional Office has advised ROMO not to communicate its guided climbing and technical mountaineering strategy with internal or external stakeholders prior to implementation. In case of an unforeseen change, there should be no communication until the business opportunity is released to the public. As such, the communication plan is:

- Phase 0: August 2014, End of Business Plan Internship Communication
- Business Plan Internship consultants held an internship wrap-up presentation discussing strategy process, alternatives, and thoughts about recommendation, emphasizing that this information is confidential and not for distribution.
- Phase 1: October 2014, Limited-Trip CUAs
- ROMO issues a press release announcing the availability of Limited-Trip CUAs for 2015 as the first phase of implementation of the updated guided climbing and technical mountaineering commercial services strategy. Distribute to local media, the current concessioner and limited climbing CUA holders, all the entities that have expressed interest and all other current CUA permit holders, and the list of stakeholders who assisted with the project. It should also be posted to the park's concessions website. See Press Release in Appendix H. See list of stakeholders' contact information on O:// Drive.
- Phase 2: Summer 2015 Business Opportunity/Prospectus for Multiple Concessions
- Regional Office releases business opportunity and prospectus on FedBiz and NPS website. ROMO issues a press release to local media, the current concessioner and limited climbing CUA holders, all the entities that have expressed interest and all other current CUA permit holders, and the list of stakeholders who assisted with project. ROMO also sends abbreviated version of this report to other land managers who assisted with project who requested follow-up. See list of other land managers' contact information and abbreviated report on O:// Drive.

E. Other recommendations

Get Approval for Five Year Contracts

ROMO must obtain approval for the desired five year contract duration from the WASO Commercial Services Chief. This requires submitting a memo and should be completed as soon as possible.

Standards for Vetting Guided Climbing and Technical Mountaineering Permit Holders

Both external and internal stakeholders emphasize the importance of having only high quality guides and businesses in the park. Although stakeholders reached no consensus on requiring certification for guides, they provided the following of suggestions for appropriately vetting companies:

Require:

- A communication device that will work throughout the park, such as a radio programmed with park frequencies or satellite phone. A normal cell phone does not suffice as most of the park does not have cell phone service.
- Minimum insurance requirements.
- Wilderness First Responder (WFR), CPR, & Leave No Trace (LNT) Trainer course level certifications.
- Stewardship programming: educate clients on the NPS mission, park history, park purpose and significance, resource protection and stewardship philosophy, and Leave No Trace and wilderness climbing ethic. Possibly require each company to commit an entire day each year to stewardship activities such as anchor replacement, trash removal, or trail improvement.
- Resource programming (in addition to Leave No Trace principles): promote low-impact climbing including prohibiting gear stashing, brushing holds, erasing chalk, prohibiting tick marks, discouraging social trails using only established approach routes, limiting further impacts beyond what has already taken place, staying out of closed areas, reducing gardening and other impacts to lichen and rock surfaces, and packing out human waste.
- Business review process: provide documentation of the company mission statement, operating plan, risk management plan, environmental management plan, and internal training program.

- Attend a one-day in-park orientation to learn about partnering with ROMO concessions, safety and SAR processes, NPS mission, park purpose and significance, park history, resource protection and stewardship philosophy, and LNT and wilderness climbing ethic. See detail below in Partnership & Community Engagement Strategies.
- Pre-trip reporting: post booked trips on Google Calendar.
- Post-trip reporting: post information on Google Form.
- Businesses must have at least one climbing guide on staff at time of application.
- Route check-offs internally to ensure route familiarity and competence.

Recommend:

- Certification for guides on the type of terrain on which they plan to guide. ROMO is primarily wilderness terrain, so this is likely to be AMGA Rock Guide, Alpine Guide, or Ski Guide. For beginner/intermediate routes with easy approaches, this could be AMGA Rock or Ice Instructor. If they only plan to lead single pitch rock climbs for beginners, then this would be AMGA or PCIA Single Pitch Instructor.
- AMGA Business Accreditation: This accreditation goes beyond guaranteeing a guide's technical skills, and ensures that a business has rigorous and uniform internal training, ethical business standards, provides worker's compensation, and complies with state and federal law.
- Stewardship: The prospective concessioner has a library on the history of the park and park resources available to guides and clients for educational purposes.
- Guiding experience (minimum number of instructional days) in terrain similar to ROMO.
- Willing/able (but not required) to be trained on the park's SAR processes and assist with SAR events if they are in the area at the time of an incident.
- Additional outdoor education training (such as NOLS, Outward Bound, etc), recognizing that effective guiding is about more than just technical skill.

Scheduling and Monitoring

Scheduling: The park shall establish and maintain a shared Google Calendar where all guides (both concessioners and single-trip CUA holders) post their confirmed planned routes. A trip must be booked and confirmed before a guide posts it on the calendar. This process will help guides self-manage overcrowding of routes and will remove the scheduling administrative burden from the park's concessions team. The calendar will also be shared with the climbing rangers, allowing them to more effectively target patrol and/or monitoring routes or SAR purposes. While we recognize guides many have to alter their planned route, due to weather, crowding, or other conditions, this visibility and information will be a big improvement over the status quo. A model for this system is the Lake City Ice Park.

Monitoring and Evaluation: Ideally, evaluation and monitoring will be shared by the concessions team and the climbing rangers in order to ensure that companies are adhering to technical climbing standards and the business standards outlined in the contract. Each concessioner will be evaluated by the climbing rangers twice per year (once in the summer and winter season) using the Climbing Specific Evaluation form (see Appendix I).

Deadlines: When companies fail to submit paperwork or fees on-time, this places an additional management burden on the concessions team. Demand among guide companies for access to ROMO is high; the Concessions team should leverage this demand to set and enforce paperwork and fee deadlines.

Data Collection

For Guided Climbing: Create a Google form for post-trip reporting and require all permit holders to fill it out after each trip. Google forms facilitate easy analytics for the Concessions team by automatically storing all data in an exportable spreadsheet and creating automated charts. The form is included in Appendix G.

For Independent Climbing: Numerous park staff expressed the desire to collect more data on total climbing happening in the park. Topics included: the number of climbers climbing specific routes, the extent of social trails related to climbing/bouldering, the type of climbing activities occurring, resource impacts from bouldering, etc. Solutions offered for filling these gaps included: sign-in books at routes, trailhead counters at routes, issuing free unrestricted climbing permits at the backcountry office, collaboration with cooperative educational study units (possibly those already doing similar work at other parks), using park research funds, creating an on-line form for independent climbers to fill out after they climb.

Commercial Services Strategies should be dynamic. In 5 years, the data should be reviewed to study use

impacts and make possible adjustments including: adjusting the number of concessions or limited-trip CUAs, adjusting the number of client days, changing the seasons or days where activities can occur, changing or eliminating locations where activities can occur, or eliminating the program entirely.

Partnership and Community Engagement Strategies

- Establish a working group with rangers, guides, community climbing groups, and private climbers about relevant climbing issues. This will allow the park to collect information on safety and resource impacts related to climbing at the park. A working group can aid park decision-making and will help ROMO deepen relationships with the local climbing community and concessioners through providing enhanced understanding about the park's priorities. Scheduling can be difficult and needs to be done in advance. Rangers suggested an open forum style with fixed topics for each session, possibly including environmental issues, SAR, or managing crowding on particular routes. In one example, Eldorado Canyon State Park has a community-based bolting committee which works well and is respected by climbers.
- One-day required training for a minimum of one leader per company to learn about partnering with concessions, safety and SAR processes, NPS mission, park purpose and significance, park history, resource protection and stewardship philosophy, and LNT and wilderness climbing ethic. This training can also serve to strengthen partnerships between the park and commercial service providers. The event would likely be held in May and should involve concessions, climbing ranger, interpretation, wilderness, and resource divisions. Due to timing, it may require seasonal climbing rangers to work in early May.
- Annual barbecue with concessioners and relevant park staff (i.e. concessions, climbing rangers, resources, interpretation). MORA instituted such informal gatherings when they moved to multiple concessioners to help build successful relationships with concessioners.
- Expand social service partnerships: Work with Boulder Climbing Community (BCC) to establish fixed trails to replace multiple social trails at bouldering areas or other high-use climbing areas in the park. BCC's full-time crew works with Eldorado Canyon State Park, Boulder County Open Space, and other public lands on trail construction/maintenance and has been funded by both donations and/or park budgets. Deepen partnership with Access Fund on volunteer events and establish a stewardship day in the park for all concessioners and CUA holders, possibly through engagement with the park's Volunteer Office.
- Create a brief video about park mission, stewardship, etc. required for guides that they can also share with their clients prior to a trip. The video could be made available to the concessioners so that they could incorporate it into their safety briefings with clients.

Add Technical Skill Evaluation to the Prospectus Bidding Process

In order to ensure a high quality of guiding and technical skills among concessioners, a climbing ranger should spend a day climbing with a guide as part of the application process and add that evaluation to the concessions application packet for consideration by the panel. For an estimate of the cost of this activity, see Appendix F.

Group Size Limit and Guide-to-Client Ratios

Group size limits and guide-to-client ratios should be consistent with park and industry standards. Specifically:

- Group size should not exceed 20 people on formal trail corridors; 7 or fewer people elsewhere. When established, group size should also be consistent with any off-trail travel guidelines for commercial services.
- Guide-to-client ratios should be:
 - Simple technical skills classes 1:6
 - Single pitch terrain 1:5
 - Multi-pitch rock climbing 1:2
 - Basic alpine terrain 3:1
 - Advanced alpine terrain 2:1
 - Ski terrain 1:5 to 1:2, as difficulty increases

Avoiding Peak Summer and Holiday Weekends

Internal and external stakeholders described crowding on routes as a problem only on the most popular routes during peak summer and holiday weekends. These routes include the Casual Route on the Diamond/East Face of Long's Peak, the North Chimney approach to the Diamond/East Face of Long's Peak, the Spearhead (Syke's Sickle, the Barb, and the North Ridge), the South Face of the Petite Grepon, the Culp-Bossier on Hallett, and the Flying Buttress on Mt. Meeker. Guides say they would respect limitations on use during these times. Possible limits could include one guided party per route per day during these periods, or completely

restricting guiding on high use days. Although it is not recommended to restrict guides from any areas right now due to limited data, contract language and training should explicitly encourage guiding companies from using most popular routes during these times while the park continues to collect data on high use routes.

Improve Online Resources for Guided Climbing

Add rock climbing and mountaineering as a section in the park's "Things to Do" webpage (<http://www.nps.gov/romo/playourvisit/things2do.htm>). Similar to the horseback riding section, include a link to the list of concessionaires.

Pricing

Some stakeholders expressed concern that less experienced guides might set very low prices, pricing out safer and more experienced guides and creating safety issues. To address this issue, the park should utilize the concessions bidding process to address this issue by ensuring that only companies with high safety standards receive contracts, then letting market competition determine the price. Other suggestions that should only be considered under specific circumstances include: setting a price for every route, setting a price ceiling for one day/multi-day trips, and setting a price floor.



Spearhead, by John Marino, August 14, 2010.

IX. Key Factors

The following key factors could adversely impact the implementation of the recommended option:

Financial Feasibility Analysis

For most guide companies, business at ROMO will involve very small additional fixed costs. Most costs will be marginal, as illustrated in the analysis below. One potential financial feasibility risk is the level of required insurance coverage as determined through the insurance review process. The industry currently has a standard of \$1 million per occurrence and \$2 million aggregate. Should the insurance requirements rise above \$2 million aggregate, the park should speak with climbing companies to determine if the new level is financially feasible for their business models before moving forward with a multiple concessioner model. If not, or if financial feasibility cannot be satisfied, the park should move to Option 3, multiple CUAs.

	Concession	CUA (Unlimited Days)	Limited Trip CUA
Revenues			
Revenue/Trip*	\$ 642	\$ 642	\$ 642
Total Marginal Revenue Per Trip	\$ 642	\$ 642	\$ 642
Costs			
Marginal Per trip			
Franchise Fee	\$ 19	n/a	n/a
Annual CUA fee**	n/a	\$ 7	\$ 100
Event Booking Fee	n/a	\$ -	\$ -
Guide Daily Wage***	\$ 300	\$ 300	\$ 300
Equipment****	\$ 60	\$ 60	\$ 25
Driving			
Other Marginal G&A*****	\$ 7	\$ 7	\$ 7
Total Marginal Costs Per Trip	\$ 380	\$ 368	\$ 425
Marginal Profit (Loss)	\$ 262	\$ 274	\$ 217
Fixed (Annual)			
Individual Guide Benefits*****	\$ 1,884	\$ 1,884	\$ 1,884
Company Insurance*****	\$ 12,058	\$ 6,000	\$ 6,000
Marketing*****	\$ 3,613	\$ 3,613	\$ 3,613
*assumes average of 2.4 clients/trip; clients/trip uses CMS data; pricing uses CMS and CUA applicant stated prices			
**assumes 15 client days annually for limited, 100 client days for unlimited			
***assumes AMGA desired wage of \$300/day (higher than actual average of ~\$175/day)			
****assumes \$25 wear-and-tear per client day, based on gear rental prices at Estes Park Mtn Shop; CMS 2013 gear purchases would show wear-and-tear of \$1.28/day			
*****from CMS 2013 AFR			
*****monthly 2014 health insurance premium for 18-35 year old Colorado male * 12 months			
*****from CMS 2013 AFR & interviews from limited CUA holder, for \$1MM insurance policy			
*****from CMS 2013 AFR			

Figure 34: Marginal Profit Analysis For Leading Trips at ROMO

Day-Use Management

The park acknowledges significant challenges in managing day-use, of which very little is commercial activity. Currently only an estimated 0.3% of climbing and technical mountaineering day-usage is commercial climbing activity; the rest is private usage. Expanding commercial guided climbing will have minimal impact on this balance between private and commercial use: the park estimates that six concession contracts along with limited-trip CUAs will raise the proportion of commercial climbing to only 0.7% of total climbing in the park. Any

profound increase in climbing activity within the park is expected to come from growth in private climbing, estimated at 3% per year by the American Mountain Guides Association.

Attempts to cap usage of specific routes, objectives, or trailheads will need to be placed on both private and commercial use to be effectively protect resources and lessen impact. Limitations on private usage necessitate the development of a Day-Use Management Plan in order to be set at appropriate and legally defensible levels. ROMO needs to collect better user data in order to evaluate the need for rationed permits for highest user days each year.

Increase in Beginner Areas

The climbing community appreciates ROMO for its challenging, steep alpine routes and highly technical traditional climbing opportunities. But a smaller number of popular beginner and intermediate climbing areas within the park exist, including Lumpy Ridge, to which many guide companies seek to bring clients. While many of the businesses interviewed serve individual clients with higher skill levels and challenging goals, a number also serve youth groups, families, or other novice climbers who are less technically skilled and more likely to stick to beginner areas. Depending on the mix of companies that receive concessions contracts, and the growth of their businesses over the course of the contract, beginner and intermediate routes may see crowding from commercial groups. The park should measure use on these routes and quantify carrying capacities. If use exceeds those capacities, the park should place limits that balance private and commercial use.

Limited Management and Monitoring Resources

The concessions management team at ROMO currently consists of 1.5 FTEs, who oversee all management of contracts, CUAs, and SUPs, as well as monitoring of concessioners and CUA holders. To date, the park has 18 concessions contracts and 130 CUAs in place. The addition of five climbing concessions and limited-trip CUAs will require both management and monitoring resources. The park's desire to ensure that all concessioners and limited-trip CUA holders are highly qualified to safely guide and promote stewardship within the park will further stress these resources. Unless the park employs the assistance of the climbing rangers and wilderness staff in managing and monitoring guided climbing concessions, potentially adds additional concessions staff, and employs more efficient yet effective administrative processes for processing and managing permits, the expanded model could overwhelm the current capacity of the concessions management team.

Certification

Through the public input process, the majority of commenters favored expanded commercial guided climbing services within the park as long as the park ensures that all service providers are highly qualified to guide in the park's terrain. Nearly one third of these respondents (31%) favored credential-based access, such as requiring certification from the American Mountain Guides Association (AMGA) or International Federation of Mountain Guides Associations (IFMGA). While some commenters decried the high expense of the AMGA or IFMGA certification, others argued that such certification is becoming the industry norm and provides a clear signal for park staff to delineate between qualified and unqualified guides.

Currently, certification is not widespread enough to warrant ROMO prohibiting access to those that do not have the credential. However, if AMGA or IFMGA certification becomes more common in future years, ROMO should consider requiring certification for guides.

X. Civic Engagement Strategy

In June 2014, the Commercial Services team underwent a civic engagement process as part of the development of the Guided Climbing Commercial Services Strategy. The process began with outreach to the existing concessioner as well as 26 commercial guides or companies that had previous contact with the park during the limited CUA pilot. Ultimately, the team completed 21 interviews of professional guides, learning about different business models and practices as well as gauging interest in commercial guiding in the park. Additionally, the team solicited input from the non-commercial climbing community, reaching out to reputable local climbers with previous experience with the park and both national and local community climbing organizations such as the Access Fund, the Colorado Mountain Club, and the Boulder Climbing Community. Refer to Appendix B for a full list of stakeholders interviewed.



On July 15, 2014 the park held a public forum to discuss guided climbing commercial services in the park, with the goal of soliciting input from the community to help staff better understand the demand for guided climbing services at the park and find opportunities to meet the needs of visitors and the guided climbing community. The park's Public Information Office circulated the invitation and the Commercial Services team asked all available climbing contacts including the American Mountain Guides Association and the community groups mentioned above to encourage their members to attend. Key questions included:

- Should there be options other than one guide service to provide guided climbing and instruction at Rocky Mountain National Park? Why or why not?
- How has the climbing community and the commercial guided climbing industry changed in the past 5, 10, 20 years?
- How might the National Park Service structure guided climbing services in the park to best fit the demand of visitors?
- What are effective ways of promoting clean climbing? What works and what does not?

More than 40 people were in attendance at the standing-room only forum. The invitation as well as a complete list of those who signed-in are available in Appendix B.

For those who were not able to attend to forum, an online comment form was created to accept anonymous input. Private climbers and professional guides, as well as professional outdoor educators and representatives of educational groups, provided 206 comments over a three week period. Similar questions to those presented in the forum were asked of respondents. The form also collected basic demographic information.

XI. Appendix

Appendix A: Commercial Service Authorization Instruments

Concession Contract Categories

Category	Land Assignment	Construction of Real Property Improvement	Financially Feasible	Maintenance	N&A
Contract I	Yes	Yes	Yes	Yes all levels. LSI/PI possible	Yes
Contract II	Yes	No	Yes	Only component renewal and routine	Yes
Contract III	Yes	No	Yes	Only routine	Yes
In-park Commercial Use Authorization	Yes if revenue is <\$25K	No	No	No	Appropriate only
Out-of-park Commercial Use Authorization	No The park can identify use areas, but the public access can not be limited	No	No	No	Appropriate only

Concessions Contracts

All concession operations must be approved and authorized by the National Park Service under delegation of authority through the preparation of a prospectus (solicitation of offers), NPS review of proposals, selection of the best offer, and final contract execution. The procedures are detailed in 36 CFR, 51.4.

Concession contracts are legal agreements between the Secretary of the Interior (or authorized delegate) and a concessioner that requires the concessioner to provide certain visitor services in the park, such as food service or retail. Other services may be authorized but not required.

The 1998 concessions law stipulates three types of concession contracts, Category I, II and III. Under the terms and conditions of a concession contract, the secretary has the authority to assign land and government improvements (facilities) to the concessioner for the conduct of its operations. A Category I contract allows a concessioner to spend capital to acquire facilities from a previous concessioner, make improvements to an existing facility or build a new facility. When any of these occur they acquire a leasehold surrender interest in the facility until the interest is depreciated, bought out by the government, or acquired by a new concessioner. Category II concession contracts have land/facility assignments but the concessioner may not acquire any leasehold surrender interest. Category III concession contracts are for operations without any land/facility assignments or leasehold surrender interest. By law, all contracts are issued by competitive bid. The typical term for a contract is 10 years, although under certain financial situations where a large capital investment is involved, a 20-year term can be authorized with specific approval from the NPS director.

New contracts do not include a preferential right of renewal except for outfitter and guide services or operators with projected annual gross receipts of less than \$500,000. Concessioners are no longer given a preferential right of refusal for new or similar services (a virtual monopoly). In fact, the intent of the new law is to encourage competition.

A concessioner pays a franchise fee to the government based on the value of the contract to the concessioner.

This franchise fee is set at a level where a reasonable opportunity for net profit relative to capital investment and obligations of the contract exists. Typical fees range from 3-5% for Category III concessions.

Commercial Use Authorizations

Commercial Use Authorizations (CUA) provide a simple means to authorize suitable commercial services to park visitors. Services must be appropriate to the park unit, but do not have to be necessary, will have incidental use and minimal impact on the park area's resources and must originate and terminate outside the boundaries of the park. The law provides for small CUAs, gross receipts of less than \$25,000, to conduct commercial operations and be assigned an area inside the park. The number of CUA's issued for an activity may not be limited, unless limitations are supported by other approved processes and policies. The National Park Service is in the process of writing regulations to implement Commercial Use Authorizations under PL 105-391.

The term of the authorization is 1 or 2 years, although 1 year is most common. Authorizations can be renewed contingent upon satisfactory performance, however no preferential right of renewal or similar provisions for renewal may be provided. Authorizations contain operating conditions and/or stipulations and may designate use such as defining routes and number of user days. Monitoring of all commercial activities is essential to ensure that business operations are conducted in a safe, fair, and reputable manner consistent with the mission of the park. Monitoring is also essential to ensure compliance with resource protection conditions stated in the permit. Where carrying capacities exist in parks to manage use, monitoring ensures compliance.

The National Park Service is authorized by the Cost Recovery Act to collect all costs associated with CUAs. There are three elements to the determination of the dollar amount that can be charged: application, administrative, and monitoring costs. Application costs start with the request for the use of park resources and end with mailing the application form. Administrative costs start when the completed application form is received and end with the final signing of the permit. Monitoring costs start when the permittee arrives in the park to perform the permitted use and end when the permitted use is over and the permittee leaves the area. Application and administrative costs can be determined using average costs derived from historic records, but monitoring costs has to reflect actual itemized costs.

Appendix B: Civic Engagement Documents

Announcement of Public Meeting



National Park Service

U.S. Department of the Interior
80517

Rocky Mountain National Park
1000 U.S. Highway 36

Estes Park, Colorado

970-586-1363 phone
970-586-1397 fax

Rocky Mountain National Park News Release

July 1, 2014
For Immediate Release
Kyle Patterson 970-586-1363

Upcoming Meeting
Highlights Guided Climbing Commercial Services Strategy
In Rocky Mountain National Park

Rocky Mountain National Park staff are currently undergoing a review and analysis of contracting practices and policies regarding commercial guided climbing at the park. This summer, an updated commercial services strategy for guided climbing is being developed and park staff are seeking stakeholder input.

Anyone interested in guided climbing in Rocky Mountain National Park is encouraged to attend a public meeting on Tuesday, July 15, from 6:00 p.m. to 7:00 p.m. at the American Mountaineering Center, 710 10th St, in Golden, Colorado.

The goals of this meeting are to help staff better understand the demand for guided climbing services at the park and find opportunities to meet the needs of visitors and the guided climbing community. Key questions that will be asked include:

- Should there be more guided climbing at Rocky Mountain National Park? Why?
- How has the climbing community and the commercial guided climbing industry changed in the past 5, 10, 20 years?
- How might the National Park Service structure guided climbing services in the park to best fit the demand of visitors?
- What are effective ways of promoting clean climbing? What works and what does not?

The meeting is open to the public; all are welcome to provide input for the future of commercial guided climbing services in Rocky Mountain National Park.

For further information or to provide input on the commercial services strategy for guided climbing please contact the park's Information Office at (970) 586-1206.

-NPS-

Attendee List from Public Meeting

Rocky Mountain National Park Guided Climbing and Technical Mountaineering Commercial Services Strategy
Public Stakeholder Meeting July 15, 2014
Sign In Sheet

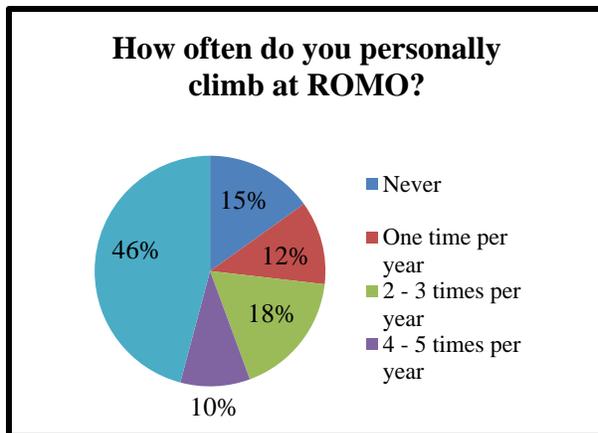
Name	Organization/Representing	Address	Email
Andrew Klotz	San Juan Mountain Guides	Durango	Andrew@mntnguide.net
Scott Massey	AMGA	BDR	scott@amga.com
Dennis & Pam Lee	N/A	Melbourne, FL	
Matt Wade	Peak Mountain Guides	PO Box 1025 Ouray, CO 81427	info@peakmountainguides.com
Matt Biscan	Colorado Mountain Club	1818 S. Quebec Way, DeZur	biscan@sbattys.com
Ed Reed	N/A	3814 Marshall St, CO	edyreed@comcast.net
Mike Alkaitis	CMS	2829 Mapleton, Boulder	malkaitis@totalclimbing.com
Russell Hunter	CMS	Same as above	rhunter@totalclimbing.com
James Faerber	OWA	20859 CR77, Lake George, CO	James@owa.com
Colin Wann	Apex Ex	6646 Reed Ct, Arvad, CO, 80003	colin@apexex.com
Flynn McFarland	Apex Ex		Flynn.mcfarland@prescott.edu
Chris Burk	Colorado Mountain School	636 Arapahoe #15, Boulder, CO	c.g.burk@gmail.com
Nate Emerson	Jackson Hole Mountain Guides	Boulder/Jackson	nate@jhmg.com
Jim Doenges	Colorado Christian University	8787 W. Alameda Av. Lakewood, CO	jdoenges@ccu.edu
Ray Hughes	N/A	PO Box 2191 Winter Park, CO 80482	raylhughes@gmail.com
Rob Coppolillo	Alpine World Ascents/AMGA	1205 Georgetown Rd 80305	coppolillo@gmail.com
Valerie Bender	AMGA	207 Canyon Blvd Suite 201N 80302	Valerie@amga.com
Name	Organization/Representing	Address	Email

Curtis Green	AMGA	P.O. Box 5489 Avon, CO	Curtis_green@msn.com
Ken Wylie	AMGA	302 Turner St NE Blacksburg	ken@mountainsforgrowth.com
Cyndi Margis	Exum Mountain Guides	P.O. Box 8759 Jackson WY 83002	Cyndi@exumguides.com
Andy Nelson	Colorado State University	555 Howes, Fort Collins, CO	Andy.nelson@colostate.edu
Bill Haneghan	Colorado Mountain Club	312 N. 18 th Ct Britishton	cmcpoodle@gmail.com
Brady Robinson	Access Fund	4272 26 th St Boulder CO 80304	brady@accessfund.org
Rob Smith	BMI	811 Grant Place, Boulder CO 80302	Smith_mountainguide@yahoo.com
Holly Barrass	CMC/YEP	11663 Hillcrest Rd, Golden 80403	hollybarrass@cmc.org
Nate Bondi	CO School of Mines, RA Guides	1500 Illinois St, Golden 80401	nbondi@mines.edu
Heather Mrozek	Avid 4 Adventure	P.O. Box 287 Boulder, CO 80304	heather@avid4.com
Rachel Vermeal	Colorado Mountain Club	701 10 th St, Golden CO	rachelvermeal@cmc.org
Betsy Winter	AMGA	P.O. Box 1739 Boulder, CO	Betsey@amga.com
Eric Owen	AMGA, PGIA	136 Estes Park, CO	Ewoen11@su.edu
Nate Disser	San Juan Mountain Guides	P.O. Box 1214 Ouray, CO 81427	nate@mtnguide.net
Mark Vermeal	Outward Bound USA	910 Jackson St, Golden CO 80401	mvermeal@outwardbound.org
Andrea Campanella	AMGA	818 County Road 116	campipphoto@gmail.com
Josh Gross	NPS		
Spencer Hennigan	Apex	714 6 th St	spencer@apexex.com
Ian Fowler	N/A	259 Pheasant Run	ianclimbs@gmail.com
Micah Lewkowitz	Alpine Ascents International	1205 15 th Ave, Longmont, CO 80501	mlekwowitz@alpineexistence.com

Summary of Public Comments Received Online

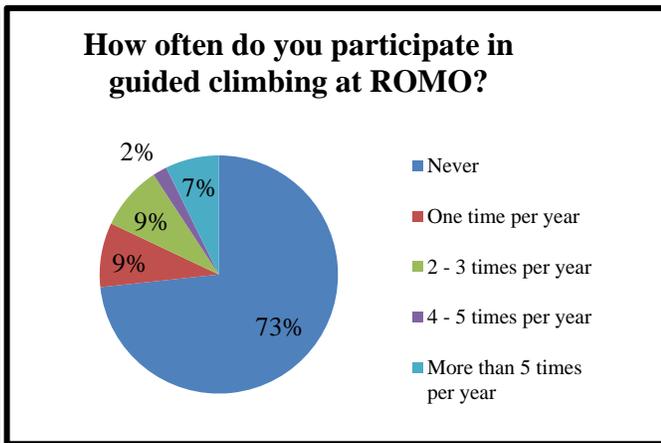
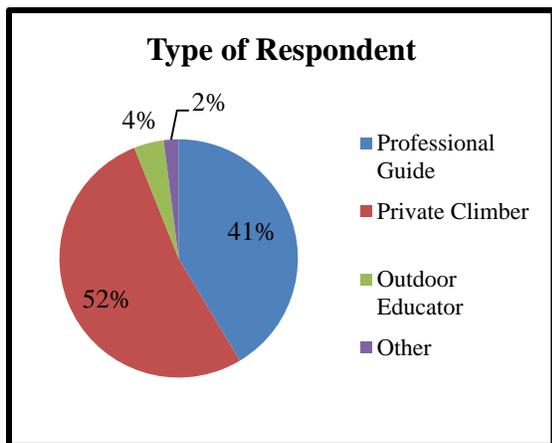
As part of the development of a guided climbing commercial services strategy, ROMO opened an online public comment form to collect input from external stakeholders on key questions. The park received 206 public comments through the form.

The demographics of the respondents were mixed. More than half of the respondents (52%) were private climbers, while 41% were professional guides, 4% were outdoor educators and 2% indicated alternate affiliations.



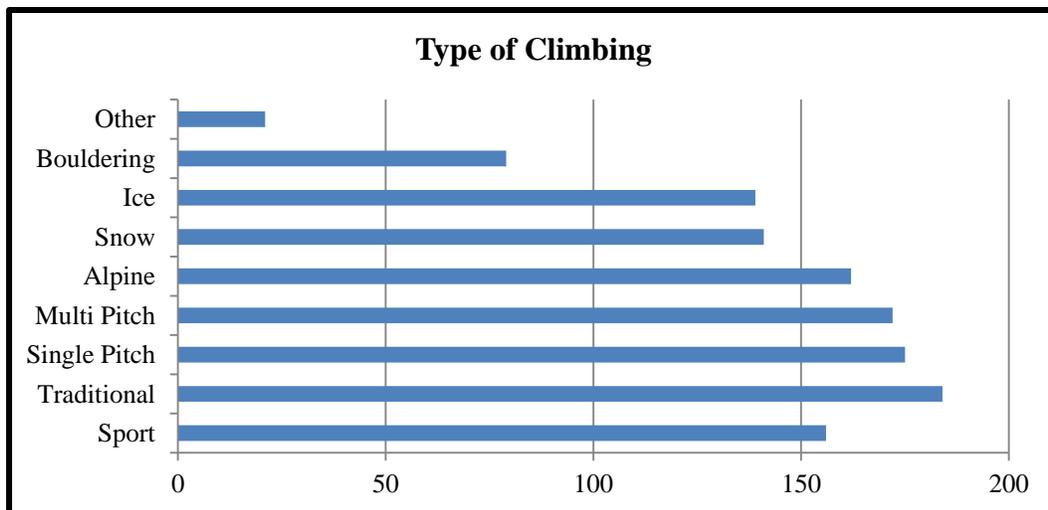
Most commenters have personal experience and knowledge of climbing in ROMO. Eighty-five percent of respondents climb at ROMO at least once per year. The majority (46%) climb at ROMO more than 5 times per year.

Very few actually participate in guided climbing at ROMO. Seventy-three percent had never experienced guided climbing in the park.



Respondents engage in a wide variety of climbing activity both within and outside of park boundaries, including traditional, sport, alpine, snow, ice climbing, and bouldering.

Each respondent was asked the following five questions and provided as much space as they needed to respond. The following is a summary of the responses received.



lengthy and expensive.”

Whether or not the increased professionalization of the industry has impacted client choice is unclear. Many commenters suggested that clients recognize the value of the AMGA and IFMGA certification when hiring a guide, while other suggested that credentialing had not influenced the clientele in any way. Regardless, there was a growing sense that hiring a guide is becoming a more acceptable and sought after practice here in the United States.

3. *Currently, Rocky Mountain National Park has one concessioner that provides all levels of guided climbing and instruction in the park. In the future, how might NPS consider structuring commercial guided climbing services in the park to best fit the demand of visitors? Should there be options other than one guide service to provide guided climbing and instruction at Rocky Mountain National Park? Why or why not?*

“People deserve the right to choose which qualified guide service they choose to use.”

The vast majority answered yes, the park should allow more than one guide company to provide commercial guiding services in the park. Both private climbers and commercial guides described the current model as “unfair” or “inequitable,” and characterized it as a “government-sponsored monopoly.” Visitor choice was a top reason cited by those advocating for expanded commercial access to the park. More than one private climber stated that they would use a guide in the park but would prefer to hire one that they already know and trust: “Guided climbing is expensive, the days are long and I prefer to spend them with someone I know and trust. Once I find a guide(s) I like, I would prefer to climb with them in RMNP instead of being forced to choose a guide from a preselected service.”

Others highlighted market competition as integral to ensuring fair prices, high quality services, and robust safety standards. Some expressed the sentiment that increased access would benefit the local economy as well. “Having no choice but to train or climb with a single guide service on NPS lands eliminates competition which is proven to reduce the quality of services and eliminates important options for the park visitor. Additional permits (ideally unlimited for qualified guides) would increase employment and create jobs in a region which is dependent on tourism as the main source of income and there are many individuals and companies who would be able to make a better living through fair and reasonable access to guiding work in RMNP.”

“I have several go-to guides spread across the country (and Europe), people I've developed relationships with over the years. These are the people I want to spend 6-12 hours with on a multi-pitch—not a stranger...I haven't yet hired a guide for RMNP for this reason.”

At the same time that many want the park to allow greater customer choice, most commenters also suggested the park should manage the quantity of commercial climbing and ensure that permits are available only to high quality guides and companies. “I definitely think competition is good for consumers; however I feel it is important to manage commercial guiding in a manner that limits the impact it has on other visitors.” There were a wide variety of suggestions for how best the park could manage the quantity and quality of guides. Twenty-eight percent stated that the park should prioritize access for certified guides to ensure that they are experienced and safe. Others suggested that the park should limit the number of user days within the park or limit access to the most popular routes to help mitigate the risk of overcrowding.

A number of commenters suggested that the park review the permitting procedures of other parks including Mount Rainier National Park, Grand Teton National Park, and North Cascades National Park. Those affiliated with educational and non-profit organizations spoke about their need for a permitting option that does not require them to work through the current concessioner. Solo guides asked for a single-trip option to allow them to occasionally visit the park with clients.

A small minority of commenters, 2%, expressed a desire for the park to maintain the sole concessioner model or eliminate commercial services entirely. “Personally, I would prefer to see the current system remain in place. If the current concessioner is competent and has a proven track-record with the park and its many great climbs, then it should remain in place. I think guided activities should remain at a minimum in the park and by creating the option for other guide services to utilize the park, there exists the possibility for an increased number of guided parties, errors, and also the potential for inconsiderate (unacceptable) guiding practices.”

“Leading by example is one of the very successful methods of teaching clean climbing. When your guide goes out of their way to haul out...trash, it leaves an impression on all present that this is our playground and we want it kept clean.”

4. *Rocky Mountain National Park is 95% protected wilderness. What are effective ways that the commercial guiding community can promote clean climbing to their clients and among private climbers to help maintain and protect the wilderness experience? In your experience, what works and what does not?*

Similar to internal stakeholders at the park, commenters highly value the wilderness experience at Rocky Mountain National Park and are concerned with impacts such as social trails, trash and human waste at the base of crags, gear stashing (particularly in bouldering areas), and too many climbers compromising their own safety on difficult routes.

Many felt strongly that increased guide presence in the park could help to promote stewardship and protect the natural resources. “Most guides try to preserve the wilderness, as it’s their office [...] Good habits are usually shared with their clients and the recreational climbers they come across,” said one professional guide. Because guides serve as “ambassadors” to the wilderness for both their clients as well as others with whom they interact, commenters felt that guides were in the ideal position to educate and lead by example, especially with beginning climbers who are less likely to have knowledge on outdoor ethics or the skills to successfully achieve challenging objectives. “Climbing has always been a way for us to get away from the human world and enter one that tests our boundaries and increases our respect for the natural world,” comments a professional guide. “A new wave of climbers will need to be educated on the value of climbing through respecting the natural world.”

Among the more than 200 comments, there were many ideas about how the park can better promote and protect the wilderness:

- Clearly mark all approach trails.
- Provide wag bags at the trailheads.
- Install dehydrating toilets where appropriate.
- Better educate the climbing public about the park’s main impact concerns and priorities as well as the clean climbing values that the park would like to promote.
- Promote “leave no trace” in the park brochure which is distributed at the park entrance.
- Use social media including beta blogs, such as MountainProject.com and 14ers.com, to promote wilderness concerns and practices
- If necessary, limit use in the most fragile areas by requiring permits of both private and commercial climbers.
- Partner with climbing organizations like the Access Fund, the American Alpine Club, Leave No Trace, and the Center for Outdoor Ethics.
- Replace old, unsafe anchors.
- Travel only on durable surfaces.
- Involve the community in decision-making regarding new routes, new hardware, and current access and impact issues through a working group or “action council” with representatives from across the industry, private climbing, and land management communities.
- Practice strong oversight and hold violators accountable. Make it easier for the public to report violators.
- Define “clean climbing” as more than just the climb itself but beginning with interactions with the community in Estes Park to the parking lot and approach trail on the way home.
- Maintain open lines of communication with the commercial guiding community.
- Promote self-reliance through self-rescue education among private climbers.

“Stewardship is an important part of guided climbing - just being in the company of an experienced guide will help ‘infect’ the climbing community with a good sense of stewardship...”

Commenters also provided many ideas about how the park can partner with commercial climbing guides to promote stewardship:

- Require Leave No Trace training of all guides in the park.
- Limit the size of commercial groups.
- Require guides to attend an in-park training on the history,

“RMNP has an opportunity to set the standard and be a leader for access to guided climbing for the US. It would be admirable if they embraced this opportunity and paved the way for credential based access.”

flora and fauna, and wilderness qualities that are unique to the park.

- Require the incorporation of interpretive themes into the guiding curriculum
- Hosting clean-up or stewardship days for commercial guiding providers and their clients to give back to the park.
- Require guides to disseminate wilderness protection and safety information including stewardship practices as well as route and weather conditions to the public via their websites and social media.
- Require guides to help remove, replace, and clean slings and anchors throughout the park.
- Request that guides spread their impact by taking clients on less popular climbs.
- Require guides to assist with search and rescue efforts.
- Ask guides to meet clients in Estes Park and carpool to the park when possible to keep traffic down.

5. *Is there anything else you think the park should consider when determining the future of commercial guided climbing services within the park boundaries?*

Commenters took time to emphasize the park's importance to the climbing community. "RMNP is not just a destination for visitors, but it is also a training ground for the thousands of climbers in the Front Range and greater Colorado who have a world-class alpine environment close by," said one professional guide who frequents the park.

Others impressed upon the importance of this process. "This is an important moment, when the NPS can move to ensure a high quality of guiding, mountain safety, and environmental stewardship, and to perpetuate a culture of respect and safety in the mountains into the United States' future," said one commenter. Another said that the decision that is made through this strategy "will have lasting and profound impacts going forward."

Many reiterated their opinions on how best to expand access and balance commercial activity with private use. One commenter was specifically concerned about not allowing commercial operators to claim the majority of bivy permits. A number of commenters also implored the park to prioritize providing access to local guides in order to support the local economy.

Finally, commenters asked the park to move slowly, to pilot new models and assess impacts before making more permanent changes to the current concessions model.

List of External Stakeholders Interviewed

Professional Climbing Guides

- Colin Wann, Apex Ex
- Eli Helmuth, ClimbingLife Guides
- Geoff Unger, Geoff Unger Mountain Guides
- Harry Kent, Kent Mountain Adventures
- James Faerber, Outdoor Wilderness Adventures
- Jason Dittmer, Jackson Hole Mountain Guides
- Jeremiah Meizis, The Colorado Climbing Guide
- Markus Beck, Alpine World Ascents
- Matt Wade, Peak Mountain Guides
- Mike Alkaitis, Colorado Mountain School
- Mike Soucy, Colorado Mountain School
- Nate Bondi, Colorado School of Mines
- Rob Smith, Boulder Mountain Institute
- Billy Rankin, Irwin Backcountry Guides
- Marty Molitoris, Alpine Endeavors, LLC
- Chris Lawrence, Life Lines
- Josh Baruch, Colorado Wilderness Rides & Guides
- Dave Watosky, Estes Park Mountain Shop
- Mike Poborsky, Exum Guides
- Nikki Shultz, Green Jeep Tours
- Pete Lardy, Pikes Peak Alpine School
- Jon Tierney, Acadia Mountain Guides
- Scott Massey, American Mountain Guides Association

Private Climbers

- Tommy Caldwell, professional climber and Estes Park native
- Roger Briggs, Boulder Climbing Community
- Ty Tyler, Access Fund
- Chris Weidner, climber
- Clif Harald, Boulder Chamber of Commerce

Internal ROMO Staff

- Vaughn Baker, Park Superintendent

- Deb Pfenninger, Chief Administrative Officer
- Mark Magnuson, Chief Ranger
- Rich Fedorchak, Chief of Interpretation
- Ben Bobowski, Chief of Resource Stewardship
- John Hannon, Business Management Specialist
- Kirsten Moody, Concessions Management Specialist
- Larry Gamble, Chief, Branch of Planning & Compliance
- Paul McLaughlin, Ecologist
- Scott Esser, Ecologist
- Kyle Patterson-Phillips, Public Information Officer/Management Specialist
- Barry Sweet, ROMO Park Ranger (Backcountry Office)
- Mark Pita, East District Ranger
- Jack Corrao, Saint Vrain Sub-District Ranger
- Dave Pettebone, Wilderness Program Manager
- Mike Lukens, Permanent Climbing Ranger
- Quinn Brett, Seasonal Climbing Ranger
- Adam Baxter, Seasonal Climbing Ranger
- Josh Gross, Seasonal Climbing Ranger
- Kevin Sturmer, Permanent Climbing Ranger

Land Managers

- Jaime Oliva, Arapaho & Roosevelt National Forest
- Jon Halverson, Arapaho & Roosevelt National Forest
- Mary Wysong, Mt Rainier National Park
- Anne Altman, NPS
- George Helfrich, Yellowstone National Park

Appendix C: Current Climbing and Technical Mountaineering Contracts

Current Concessions Contract

Category III Contract

**United States Department of the Interior
National Park Service**

Rocky Mountain National Park

Instruction and Guide Service in Technical Rock Climbing and Ice Climbing, Non-Technical and Technical Mountaineering, Ski Mountaineering, Technical Rescue Training, and Avalanche Awareness and Education

Concession Contract No. ROMO003-04

**Andrews, Bicknell, and Crothers, LLC
P.O. Box 1846
341 Moraine Avenue
Estes Park, CO 80517
(970) 586-5758
cmschool@cmschool.com**

Doing business as: Colorado Mountain School

Covering the Period January 1, 2004 through December 31, 2013

This Contract is between the National Park Service and Andrews, Bicknell, and Crothers, LLC, (hereinafter referred to as “Concessioner”), a Limited Liability Corporation, dba Colorado Mountain School under the authority of 16 U.S.C. 1 et. seq., including 16 U.S.C. 5901 et seq., and other laws that supplement and amend these laws. The Director and the Concessioner agree:

Sec. 1. Term of Contract

This Contract will be from January 1, 2004 until its expiration on December 31, 2013.

Sec. 2. Services and Operations

(a) Required and Authorized Visitor Services

The Concessioner must provide the following required Visitor Services within the Area:

- Instruction and guide service in technical rock climbing
- Instruction and guide service in technical ice climbing
- Instruction and guide service in technical mountaineering
- Technical rescue training

The Concessioner may provide the following authorized Visitor Services within the Area:

- Instruction and guide service in ski mountaineering
- Instruction and guide service in non-technical mountaineering
- Avalanche awareness and education classes
- Other education classes appropriate to climbing and mountaineering

If the concessioner believes that services other than those identified herein are within the scope of the contract, they must submit their request to offer any other services in writing to the Superintendent. The service may not be offered unless it is approved by the Superintendent and an amendment to this contract is issued.

(b) Operation, Maintenance and Quality of Operation

The Concessioner must provide, operate and maintain the Visitor Services in accordance with this Contract in a manner considered satisfactory by the Director, including the nature, type and quality of the Visitor Services. The Concessioner's authority to provide the required Visitor Services under the terms of this Contract is exclusive. The Concessioner's authority to provide the authorized Visitor Services under the terms of this Contract is not exclusive. The Concessioner's operations and contract compliance will be evaluated on at least an annual basis.

(c) Operating Plan

The Director will establish and revise, as necessary, after consultation with the Concessioner, specific requirements for the operations of the Concessioner under this Contract in the form of an Operating Plan. The initial Operating Plan is attached to this Contract as Exhibit B.

(d) Rates

All rates and charges to the public by the Concessioner for Visitor Services must be reasonable and appropriate and must be approved by the Director.

(e) No Capital Improvements

The Concessioner may not construct any Capital Improvements upon Area lands.

Sec. 3. Concessioner Personnel

(a) The Concessioner must ensure that its employees are hospitable and exercise courtesy and consideration in their relations with the public.

(b) The Concessioner must establish appropriate screening, hiring, training, safety, employment, termination and other policies and procedures.

(c) The Concessioner must review the conduct of any of its employees whose action or activities are considered by the Concessioner or the Director to be inconsistent with the proper administration of the Area and enjoyment and protection of visitors and must take such actions as are necessary to correct the situation.

(d) The Concessioner must maintain, to the greatest extent possible, a drug free work environment.

Sec. 4. Environmental

The Concessioner must utilize appropriate best management practices (practices that apply the most current and advanced means and technologies available to the Concessioner to undertake and maintain a superior level of environmental performance reasonable in light of the circumstances of the operations conducted under this Contract) in its provision of Visitor Services and other activities under this Contract.

Sec. 5. Fees

(a) Franchise Fee

(1) The Concessioner must pay a franchise fee to the Director as follows: 3% of gross receipts.

(2) The Concessioner has no right to waiver of the fee under any circumstances.

(b) Payments Due

(1) The franchise fee will be paid as follows:

The franchise fee for gross receipts generated between January 1 and May 31 will be paid on June 15th of the same calendar year.

The franchise fee for gross receipts generated between June 1 and December 31 will be paid on January 15th of the next calendar year.

(2) All franchise fee payments consisting of \$10,000 or more, will be deposited electronically by the Concessioner in the manner directed by the Director.

(3) The Concessioner must pay any additional fee amounts due at the end of the operating year as a result of adjustments at the time of submission of the Concessioner's Annual Financial Report. Overpayments will be offset against the following year's fees. In the event of termination or expiration of this Contract, overpayments will first be offset against any amounts due and owing the Government, and the remainder will be paid to the Concessioner.

(b) Interest

An interest charge will be assessed on overdue amounts for each thirty (30) day period, or portion thereof, that payment is delayed. The percent of interest charged will be based on the current value of funds to the United States Treasury as published quarterly in the Treasury Fiscal Requirements Manual. The Director may also impose penalties for late payment to the extent authorized by Applicable Law.

Sec. 6. Insurance

The Concessioner must obtain and maintain during the entire term of this Contract at its sole cost and expense, coverage necessary to fulfill the obligations of this Contract. The insurance requirements are set forth in Exhibit D.

Sec. 7. Records and Reports

(a) Accounting System

(1) The Concessioner must maintain an accounting system under which its accounts can be readily identified with its system of accounts classification. Such accounting system must be capable of providing the information required by this Contract. The Concessioner's system of accounts classification must be directly related to the Concessioner Annual Financial Report Form issued by the Director.

(2) If the Concessioner's annual gross receipts are \$500,000 or more, the Concessioner must use the accrual accounting method.

(3) The Concessioner must keep its accounts in such manner that there can be no diversion or concealment of profits or expenses in the operations authorized under this Contract by means of arrangements for the procurement of equipment, merchandise, supplies or services from sources controlled by or under common ownership with the Concessioner or by any other device.

(b) Annual Financial Report

(1) The Concessioner must submit annually as soon as possible but not later than April 1 of the following year a financial statement for the preceding calendar year or portion of a year as prescribed by the Director ("Concessioner Annual Financial Report").

- (1) If the annual gross receipts of the Concessioner are in excess of \$1,000,000, the financial statements must be audited by an independent Certified Public Accountant in accordance with Generally Accepted Auditing Standards (GAAS) and procedures promulgated by the American Institute of Certified Public Accountants.
- (2) If annual gross receipts are between \$500,000, and \$1,000,000, the financial statements must be reviewed by an independent Certified Public Accountant in accordance with Generally Accepted Auditing Standards (GAAS) and procedures promulgated by the American Institute of Certified Public Accountants.
- (3) If annual gross receipts are less than \$500,000, the financial statements may be prepared without involvement by an independent Certified Public Accountant, unless otherwise directed by the Director.

(a) Other Reports

- (1) Balance Sheet. If requested by the Director, within ninety (90) days of the execution of this Contract or its effective date, whichever is later, the Concessioner must submit to the Director a balance sheet as of the beginning date of the term of this Contract. The balance sheet must be audited or reviewed, as determined by the annual gross receipts, by an independent Certified Public Accountant.
- (2) The Director from time to time may require the Concessioner to submit other reports and data regarding its performance under this Contract or otherwise, including, but not limited to, operational information.

Sec. 8. Suspension, Termination, or Expiration

(a) Termination and Suspension

- (1) The Director may temporarily suspend operations under this Contract in whole or in part or terminate this Contract in writing at any time in order to protect Area visitors, protect, conserve, and preserve Area resources, or to limit Visitor Services in the Area to those that continue to be necessary and appropriate.
- (2) The Director may terminate this Contract if the Director determines that the Concessioner has materially breached any requirement of this Contract.

In the event of a breach of the Contract, the Director will provide the Concessioner an opportunity to cure by providing written notice to the Concessioner of the breach. In the event of a monetary breach, the Director will give the Concessioner a fifteen (15) day period to cure the breach. If the breach is not cured within that period, then the Director may terminate the Contract for default. In the event of a nonmonetary breach, if the Director considers that the nature of the breach so permits, the Director will give the Concessioner thirty (30) days to cure the breach, or to provide a plan, to the satisfaction of the Director, to cure the breach over a specified period of time. If the breach is not cured within this specified period of time, the Director may terminate the Contract for default. Notwithstanding this provision, repeated breaches (two or more) of the same nature will be grounds for termination for default without a cure period. In the event of a breach of any nature, the Director may suspend the Concessioner's operations as appropriate in accordance with Section 8(a).

(b) Requirements in the Event of Suspension, Termination or Expiration

(1) In the event of suspension or termination of this Contract for any reason or expiration of this Contract, no compensation of any nature will be due the Concessioner, including, but not limited to, compensation for personal property, or for losses based on lost income, profit, or the necessity to make expenditures as a result of the termination.

(2) Upon termination of this Contract for any reason, or upon its expiration, and except as otherwise provided in this section, the Concessioner must, at the Concessioner's expense, promptly vacate the Area, remove all of the Concessioner's personal property, and repair any injury caused by removal of the property. This removal must occur within thirty (30) days (unless the Director in particular circumstances otherwise determines). Personal property not removed from the Area will be considered abandoned property subject to disposition by the Director, at full cost and expense of the Concessioner.

Sec. 9. Assignment, Sale or Encumbrance of Interests

This Contract may not be assigned [e.g. sold] or encumbered [e.g. mortgaged] without the approval of the Director in accordance with 36 CFR Part 51 with respect to proposed assignments and encumbrances.

Sec. 10. General Provisions – See Addendum 1.

Addendum 1 attached to this Contract is made a part of this Contract.

By:
CONCESSIONER:

UNITED STATES OF AMERICA

(Title), Andrews, Bicknell, and Crothers, LLC

(Title), National Park Service

Date: _____

Date: _____

Attest
By: _____

Title: _____

Attachments:

- Addendum 1 – General Provisions
- Exhibit A – Nondiscrimination
- Exhibit B – Operating Plan
- Exhibit C – Assigned Government Personal Property
- Exhibit D – Insurance

Limited Climbing and Technical Mountaineering CUA Permit

Form 10-114 (CUA)
Rev. 9/2007

**UNITED STATES DEPARTMENT OF THE INTERIOR
National Park Service
ROCKY MOUNTAIN NATIONAL PARK
COMMERCIAL USE AUTHORIZATION/
SPECIAL USE PERMIT**

1. Permit Holder:

Name: «Title» «FName» «LName» Permit Number: «Permit_»
 Concessioner: «Concessioner» Name of Use: «Name_of_Use»
 Address: «Address» Date Permit Effective: «Begin_Date»
 «City», «State» «Zip» Date Permit Expires: «Expires»
 Phone Number: «Phone_Number»

The holder is hereby authorized to use Rocky Mountain National Park for the purpose(s) of: «Name_of_Use»

3. SUMMARY OF AUTHORIZED ACTIVITY: (see attached sheets for additional information and conditions)

Out- of- Park: The commercial services described above must originate and terminate outside of the boundaries of the park area. This permit does not authorized the holder to advertise, solicit business, collect fees, or sell any goods or services within the boundaries of the park area.

In- Park: The commercial service described above must originate and be provided solely within the boundaries of the park area.

4. Authorizing legislation or other authority: Section 418, P.L. 105-391 (16 USC 5966)

5. NEPA Compliance: CATEGORICALLY EXCLUDED EA/FONSI OTHER APPROVED PLANS .

6. APPLICATION FEE: Required Not Required Amount \$250.

7. LIABILITY INSURANCE: Required Not Required Amount \$ 300,000 per occurrences.

ISSUANCE of this authorization is subject to the conditions. The undersigned hereby accepts this authorization subject to the terms, covenants, obligations, and reservations, expressed or implied herein.

8. Signatures

Permittee:	_____	_____	_____
	Signature	Title	Date
Authorizing NPS Official:	_____	Superintendent	_____
	Signature	Title	Date
Authorizing NPS Official: (additional if required)	_____	_____	_____
	Signature	Title	Date

CONDITIONS OF THIS AUTHORIZATION

1. The holder is prohibited from knowingly giving false information. To do so will be considered a breach of conditions and be grounds for revocation: [RE: 36 CFR 2.32(a)(3)].
2. The holder shall exercise this privilege subject to the supervision of the park area Superintendent. The holder shall comply with all applicable laws and regulations of the area and terms and conditions of the authorization. The holder must acquire all permits or licenses of State or local government, as applicable, necessary to provide the services described above, and, must operate in compliance with all applicable Federal, State, and local laws and regulations, including, without limitation, all applicable park area policies, procedures and regulations. The commercial services described above are to be provided to park area visitors at reasonable rates and under operating conditions satisfactory to the park area superintendent.
3. This authorization is issued upon the express condition that the United States, its agents and employees shall be free from all liabilities and claims for damages and/or suits for or by reason of any injury, injuries, or death to any person or persons or property of any kind whatsoever, whether to the person or property of the (holder), its agents or employees, or third parties, from any cause or causes whatsoever while in or upon said premises or any part thereof during the term of this authorization or occasioned by any occupancy or use of said premises or any activity carried on by the (holder) in connection herewith, and the (Holder) hereby covenants and agrees to indemnify, defend, save and hold harmless the United States, its agents, and employees from all liabilities, charges, expenses and costs on account of or by reason of any such injuries, deaths, liabilities, claims, suits or losses however occurring or damages growing out of the same.
4. Holder agrees to carry general liability insurance against claims occasioned by the action or omissions of the holder, its agents and employees in carrying out activities and operations under this authorization. The policy shall be in the amount of **\$ 1,000,000 per occurrences** and underwritten by a United States company naming the United States of America (**National Park Service, Rocky Mountain National Park and 1000 Hwy. 36, Estes Park, CO 80517**) as additional insured. Holder agrees to have on file with the park copies of the above insurance with the proper endorsements.
5. Cost incurred by the park as a result of accepting and processing the application and managing and monitoring the authorization activity will be reimbursed by the holder. Administrative costs and estimated costs for activities on site must be paid when the authorization is approved. If any additional costs are incurred by the park, the holder will be billed at the conclusion of the authorization.
6. Benefit- Neither Members of, nor Delegates to Congress, or Resident Commissioners shall be admitted to any share or part of this authorization or derive, either directly or indirectly, any pecuniary benefit to arise therefrom: Provided, however, that nothing herein contained shall be construed to extend to any incorporated company, if the authorization be for the benefit of such corporation.
7. This authorization may not be transferred or assigned without the written consent of the park area Superintendent.
8. This authorization may be terminated upon breach of any of the conditions herein or at the discretion of the park area Superintendent.
9. The holder is not entitled to any preference to renewal of this authorization except to the extent otherwise expressly provided by law. This authorization is not exclusive and is not a concession contract.
10. The holder shall not construct any structures, fixtures or improvements in the park area. The holder shall not engage in any groundbreaking activities without the express, written approval of the park area Superintendent.
11. The holder is to provide the park area Superintendent upon request (and in the event, immediately after expiration of this authorization) a statement of its gross receipts from its activities under this authorization and any other specific information related to the holder's operations that the park area Superintendent may request, including but not limited to, visitor use statistics and resource impact assessments.
12. The holder is to maintain an accounting system under which its accounts can be readily identified within its

system of accounts classification. This accounting system must be capable of providing the information required by this authorization. The holder grants the United States of America and the General Accounting Office access to its books and records at any time for the purpose of determining compliance with the terms and conditions of this authorization.

**APPENDIX
SPECIAL PARK CONDITIONS
Guided Technical Climbing and Bouldering**

A. Authorized Services

- a. The commercial activity authorized by this permit is **Guided Technical Climbing and Bouldering**. Technical climbing- Climbing involving a rope and some means of protection, as opposed to scrambling or glacier travel. Bouldering – Climbing on rock formations un-rope and within a safe distance of the ground that requires the use of specialized equipment (rock climbing shoes, chalk, crash pad, etc.).
- b. This permit authorizes fifteen (15) client days in the park for duration of the permit. For example, a client day is a guide plus one individual equals 1 client day. A guide plus 2 individuals equals 2 client days. If the same guide and same individual comes two days in a row that is 2 client days.
- c. Guided Rock and Ice Climbing and technical rock and ice courses are authorized under this permit. ** see specialized conditions.
- d. Trips are encouraged to be provided during mid-week to avoid peak use on weekends and holidays.
- e. **No overnight backcountry camping is allowed under this permit.**
- f. **Bivouac by permit from the Backcountry Office is authorized.**
- g. All climbing activities must be conducted in a manner respectful of the park's resources and wilderness characteristics, while emphasizing visitor safety.

Specialized Conditions

1. Fifteen (15) client days are authorized under this permit. Each trip must be scheduled in at minimum of 14-days in advance with the concession office at 970-586-1209. The following information is needed for each trip: Name of Permittee, Type of Trip, Date, Time, Location, and number of clients.
2. *There will be a \$20 per event booking fee for each wedding event booked under your Commercial Use Authorization (CUA) permit. Those fees will be collected on quarterly basis determined by the number of weddings in that quarter.*
3. Resource Protection/Sanitation
 - a) The permittee is responsible for adhering to Leave No Trace practices at all times while in the park.
 - b) The permittee shall be responsible for becoming knowledgeable of and complying with all backcountry regulations regarding sanitation.
 - c) Guides/instructors are required to practice and promote "clean climbing" techniques, which include the use of removable equipment such as chocks and camming devices which do not deface the rock. The use of chalk shall be minimized. Gear such as slings shall be removed whenever practical. The use of neutral colored slings and chalk is encouraged.
 - d) The installation of permanent fixed anchors is prohibited under this permit
4. Approved Guide Client Ratios
 - a) Standard Ratios:
 - Simple technical skills classes 1:6
 - Multi-pitch classes 1:3
 - Alpine days 1:4 - 1:2 depending on route difficulty
 - b) Courses:
 - Beginning rock climbing top rope 1:6
 - Beginning rock climbing multi-pitch 1:4 - 1:3
 - Intermediate rock climbing 1:3

- Advanced rock climbing 1:2
- c) Longs Peak:
 - Keyhole: winter/technical 1:3
 - North Face: summer 1:4, winter 1:3
 - Keiners Route: summer 1:3, winter 1:2
 - d) All harder routes no more than 1:2.
5. Search and Rescue of Other Parties
- a) Guides must always ensure the safety of their clients before participating in any search and rescue operation.
 - b) Guides will not be paid by the Park for search and rescue operations initiated by themselves or others.
6. Equipment
- The permittee is responsible for the operation, maintenance, repair, and replacement of all equipment used in the operation. Mountaineering equipment provided or rented to clients shall be of such quality and maintained in such condition as to be adequate and safe, in terms of strength and durability, for the use intended. Guides/instructors shall carry adequate equipment to perform emergency repairs to mountaineering equipment in the field. All equipment shall be subject to inspection by the Superintendent or his/her representative. The placement of fixed anchors using power drills is prohibited.
7. Food Service
- Food service provided shall be in accordance with current U.S. Public Health Service Food Code.
- B. Trip Instructors Certification**
1. Trip leaders must:
 - a. Be familiar with the park, know and obey park regulations and area closures, and assure compliance with regulations and area closures from participants.
 - b. Understand the hazards involved and prepare participants for conditions and situations which may be encountered.
 - c. All guides will have minimum current certification in standard first aid and CPR and carry a basic first aid kit.
 - d. Guides shall carry first aid equipment adequate for emergency treatment of common mountaineering injuries in the field.
 - e. All guides are required to have and carry a cell phone in the field.
 - f. Assure that all members of the group are properly clothed and equipped for the trip.
 2. A written list of instructors, with their current level of certifications, must be provided to the park prior to beginning operations. Copies of all certifications must be on file at the base of operations, and may be requested by the Superintendent at any time.
 3. Guides shall be familiar with local climbing areas. They shall be responsible for their group's behavior. They shall know and communicate to their clients' applicable park regulations and policies relating to backcountry management. Guides shall provide clients with information regarding NPS mission, safety, Leave No Trace outdoor skills and ethics, climbing in designated Wildernes Areas, and local resource protection and regulations. Additional suggested topics include geology, natural and cultural history, and the climbing history of the Rocky Mountain region.
- C. Conduct of Trip**
- a. All trip participants must honor the rights of others and conduct themselves in an orderly manner at all times.
 - b. A Rocky Mountain National Park Ranger will be permitted to accompany a trip at least once per season to evaluate the program.
 - c. All trips are required to utilize and promote Leave No Trace hiking practices to minimize impacts on the resource.
 - d. Guides/instructors are required to practice and promote "clean climbing" techniques, which include the use of removable equipment such as chocks and camming devices which do not deface the rock. The use of chalk

shall be minimized. Gear such as slings shall be removed whenever practical. The use of neutral colored slings and chalk is encouraged.

- e. Mountaineering equipment provided to clients shall be of such quality and maintained in such condition as to be adequate and safe, in terms of strength and durability, for the use intended. Guides/instructors shall carry adequate equipment to perform emergency repairs to mountaineering equipment in the field. Equipment is subject to inspection as a condition of this permit.
- f. The caching of climbing gear is prohibited.

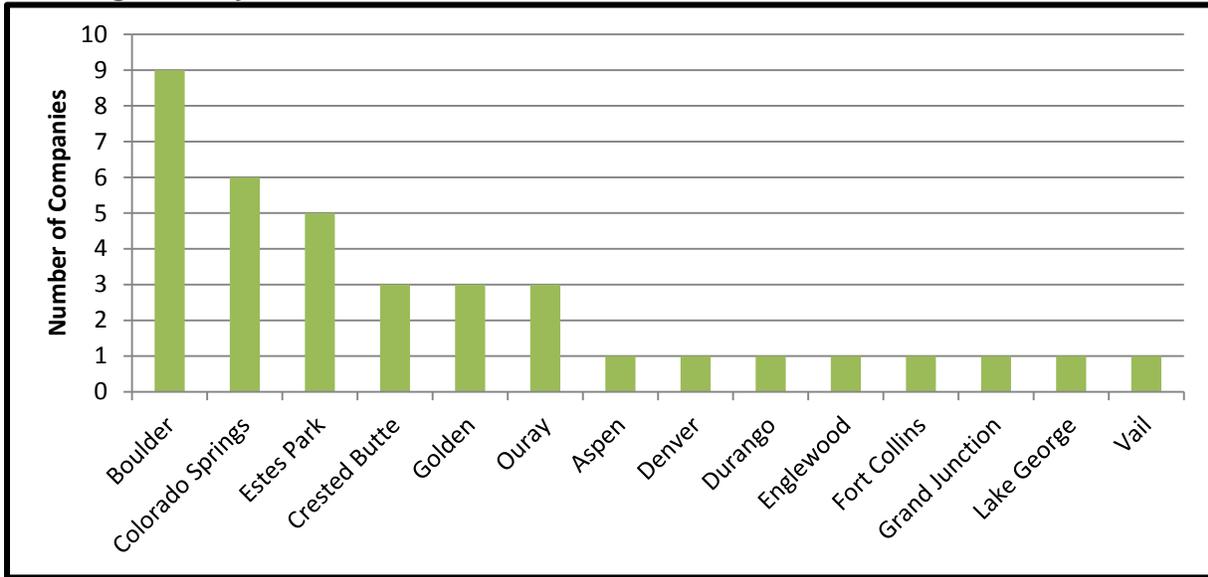
D. General Provisions

a. Guide Passes and Entrance Fees for Clients

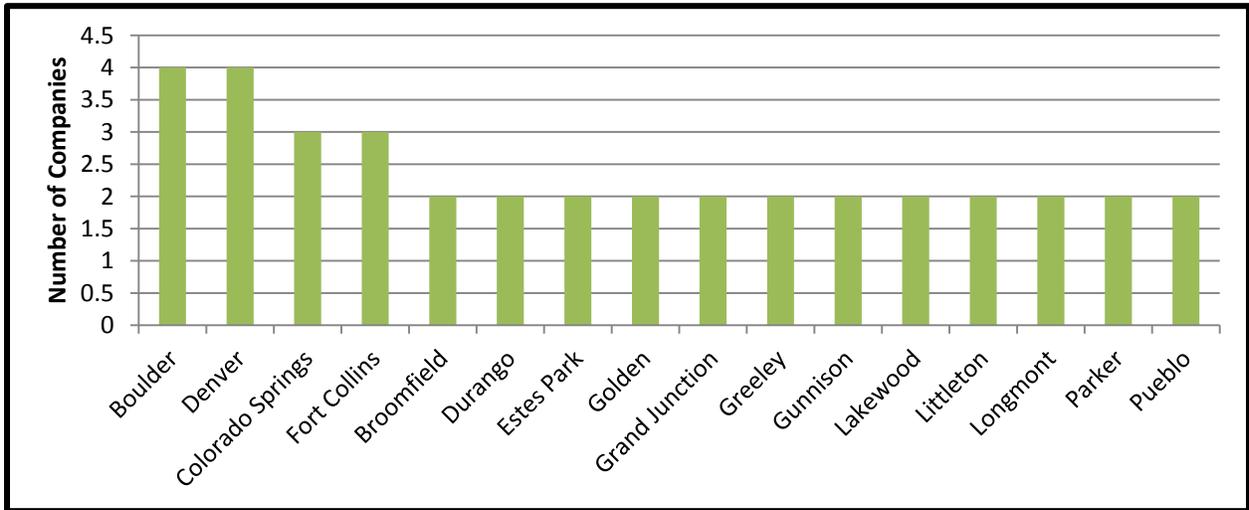
- Guide Passes are to be used solely by the Permittee and designated employees to conduct official business under a Commercial Use Authorization/ Special Use Permit or Concessions Contract and are not for personal use.
 - Guide Passes must be kept with guides at all times in the park, to be presented as requested to park staff to confirm appropriate use and entry to the park. Permittee is responsible for ensuring that its guides comply with this requirement. ID is required.
 - Clients of the Permittee are not admitted free entrance to the park. The clients' options are:
 - \$10.00 one-time entrance fee paid when they enter with Permittee
 - Proof of entrance (receipt for 7-day entrance to park)
- b. Use of pass [Rocky Mountain National Park Pass, Interagency Passes (Annual, Senior, or Access), Age Pass, Access pass] **(pass is valid & in the name of the client)**
 - c. Prior to initiating each trip, guides are encouraged to contact Park Headquarters (970) 586-1206 for information on current conditions.
 - d. Proof of adequate general liability and automobile insurance coverage must be provided to the park prior to operating under this permit. Commercial general comprehensive liability coverage is required in the amount of \$1,000,000 per person per accident. Automobile coverage is required for all owned, non-owned, and hired vehicles used by the Permittee. Minimum limits are: car, van, or bus up to five passengers, \$300,000; six to 12 passengers, \$500,000; 13 to 20 passengers, \$750,000; 21 to 50 passengers, \$1,500,000. Rocky Mountain National Park must be listed as additional insurer.
 - e. All incidents involving overdue parties or accidents involving property damage or personal injury must be reported to park dispatch at (970) 586-1203 as soon as possible.
 - f. All advertisements/brochures which make reference to Rocky Mountain National Park must be approved by the Superintendent prior to publication, distribution or broadcasting. All such publications must include a statement that the operator is authorized by the National Park Service, U.S. Department of the Interior, to conduct services in Rocky Mountain National Park.
 - g. Violation of park regulations or the terms of this permit will result in the suspension of privileges granted by this permit and could lead to appropriate fines or citations, as well as non-renewal.
 - h.

Appendix D: Additional Market Analysis Graphs

Climbing Industry

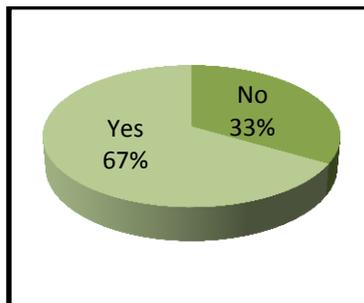


Climbing Guide Companies by City

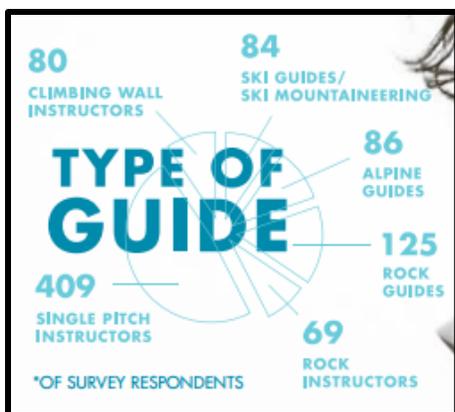


Climbing Gyms by City

AMGA Certification



Does your company have AMGA-certified guides?

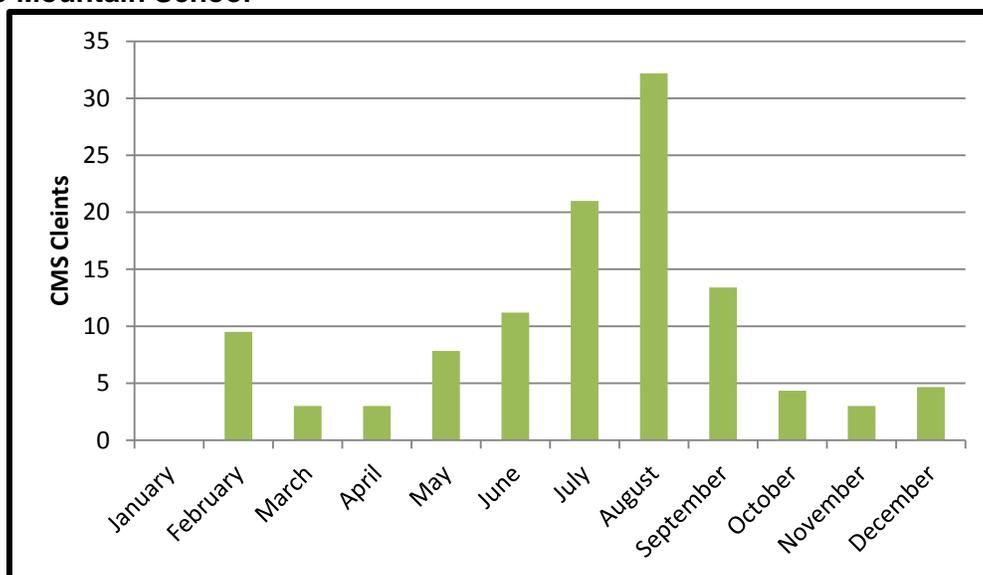


AMGA Guides By Activity

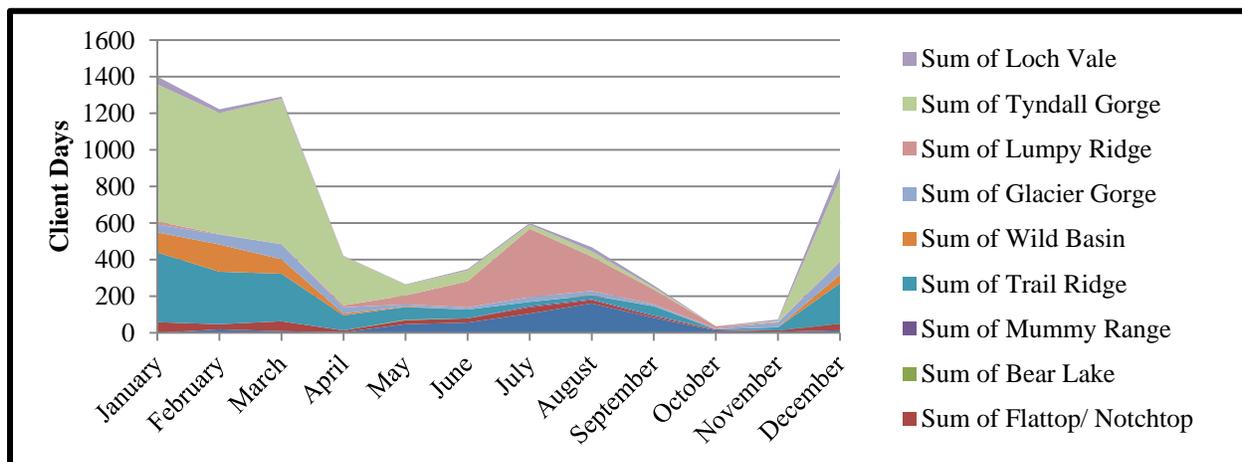


AMGA Time & Money Invested in Guiding Education

Colorado Mountain School



Average Monthly CMS Visitation to Longs Peak, 2009-2014



CMS Guided Climbing Activity by ROMO Area, 2009-2014¹⁵

¹⁵ January and April 2010 data is missing.

Appendix E: Methodology & Scenario Analysis for the Recommended Number of Concessions

Expected climbing client days were modeled for 1 through 15 concessioners for two scenarios: 1) best estimate and 2) the maximum expected use.

The expected use scenario has the following assumptions:

- 20 limited-trip CUAs with three calendar days issued annually with a maximum group size of 12 (this number is based on the 26 companies that expressed interest for limited CUAs and the 12 that have CUAs at Eldorado Canyon State Park),
- A reduction in the number of limited-trip CUAs issued with 10 or more concessioners due to a finite number of relevant companies,
- Flat business under the one concession model, consistent with historical data,
- The current concessioner (concessioner 1) retains its market share with only 2 concessioners,
- For each additional concessioner under 10, concessioner 1 loses 75 user days,
- For each additional concessioner 10 and over, concessioner 1's loss of business slows down to only 30 days,
- At 15 concessioners, all concessioners have the same market share on average,
- Each additional concessioner uses an average of 150 user days, half of which is new business and half of which is cannibalized from existing park businesses.

Expected Scenario								
User days by each business	Number of Concessioners							
	1	2	3	4	5	6	10	15
Limited Trip CUA	720	720	720	720	720	720	612	540
1	636	636	561	486	411	336	216	150
2		150	150	150	150	150	150	150
3			150	150	150	150	150	150
4				150	150	150	150	150
5					150	150	150	150
6						150	150	150
10							600	600
15								450
Total Guided User Days	1356	1506	1581	1656	1731	1806	2178	2490

For the maximum use scenario has the following assumptions:

- 20 limited-trip CUAs with three calendar days issued annually with a maximum group size of 12 (this number is based on the 26 companies that expressed interest for limited CUAs and the 12 that have CUAs at Eldorado Canyon State Park),
- A reduction in the number of limited-trip CUAs issued with 10 or more concessioners due to a finite number of relevant companies,
- All companies would be the same size as the current concessioner (636 user days annually)

Maximum Use Scenario								
User days by each business	Number of Concessioners							
	1	2	3	4	5	6	10	15
Limited Trip CUA	720	720	720	720	720	720	612	540
1	668	636	636	636	636	636	636	636
2		636	636	636	636	636	636	636
3			636	636	636	636	636	636
4				636	636	636	636	636
5					636	636	636	636
6						636	636	636
10							2544	2544
15								3180
Total Guided User Days	1388	1992	2628	3264	3900	4536	6972	10080

After analyzing these two scenarios, the park looked at how the different number of concessioners affected total climbing days, under a range of assumptions for the growth in private climbing.

In 5 years		% Increase in Total Climbing Days [Expected]						
# Concessions	Guided Climbing Increase	Private Climbing Increase						
		0%	5%	10%	20%	30%	40%	50%
1	113%	0.4%	5.3%	10.3%	20.3%	30.3%	40.2%	50.2%
2	137%	0.4%	5.4%	10.4%	20.4%	30.3%	40.3%	50.3%
3	149%	0.5%	5.4%	10.4%	20.4%	30.4%	40.3%	50.3%
4	160%	0.5%	5.5%	10.5%	20.4%	30.4%	40.4%	50.3%
5	172%	0.5%	5.5%	10.5%	20.5%	30.4%	40.4%	50.4%
6	184%	0.6%	5.6%	10.5%	20.5%	30.5%	40.4%	50.4%
10	242%	0.8%	5.7%	10.7%	20.7%	30.7%	40.6%	50.6%
15	292%	0.9%	5.9%	10.9%	20.8%	30.8%	40.8%	50.8%

In 5 years		% Increase in Total Climbing Days [Maximum Expected Use]						
# Concessions	Guided Climbing Increase	Private Climbing Increase						
		0%	5%	10%	20%	30%	40%	50%
1	118%	0.4%	5.4%	10.3%	20.3%	30.3%	40.2%	50.2%
2	213%	0.7%	5.6%	10.6%	20.6%	30.6%	40.5%	50.5%
3	313%	1.0%	6.0%	10.9%	20.9%	30.9%	40.8%	50.8%
4	413%	1.3%	6.3%	11.3%	21.2%	31.2%	41.2%	51.1%
5	513%	1.6%	6.6%	11.6%	21.5%	31.5%	41.5%	51.4%
6	613%	1.9%	6.9%	11.9%	21.8%	31.8%	41.8%	51.7%
10	996%	3.1%	8.1%	13.1%	23.0%	33.0%	43.0%	52.9%
15	1485%	4.6%	9.6%	14.6%	24.6%	34.5%	44.5%	54.5%

The park then analyzed how the different number of concessioners affected the mix of guided vs. private climbing, under a range of assumptions for the growth in private climbing.

In 5 years		<i>Guiding Climbing as a % of Total Climbing [Expected]</i>						
# Concessions	Guided Climbing Increase	Private Climbing Increase						
		0%	5%	10%	20%	30%	40%	50%
1	113%	0.7%	0.6%	0.6%	0.6%	0.5%	0.5%	0.4%
2	137%	0.7%	0.7%	0.7%	0.6%	0.6%	0.5%	0.5%
3	149%	0.8%	0.7%	0.7%	0.6%	0.6%	0.6%	0.5%
4	160%	0.8%	0.8%	0.7%	0.7%	0.6%	0.6%	0.5%
5	172%	0.8%	0.8%	0.8%	0.7%	0.6%	0.6%	0.6%
6	184%	0.9%	0.8%	0.8%	0.7%	0.7%	0.6%	0.6%
10	242%	1.1%	1.0%	1.0%	0.9%	0.8%	0.8%	0.7%
15	292%	1.2%	1.1%	1.1%	1.0%	0.9%	0.9%	0.8%

In 5 years		<i>Guiding Climbing as a % of Total Climbing [Maximum Expected Use]</i>						
# Concessions	Guided Climbing Increase	Private Climbing Increase						
		0%	5%	10%	20%	30%	40%	50%
1	118%	0.7%	0.6%	0.6%	0.6%	0.5%	0.5%	0.5%
2	213%	1.0%	0.9%	0.9%	0.8%	0.7%	0.7%	0.6%
3	313%	1.3%	1.2%	1.2%	1.1%	1.0%	0.9%	0.9%
4	413%	1.6%	1.5%	1.4%	1.3%	1.2%	1.1%	1.1%
5	513%	1.9%	1.8%	1.7%	1.6%	1.4%	1.3%	1.3%
6	613%	2.2%	2.1%	2.0%	1.8%	1.7%	1.6%	1.5%
10	996%	3.3%	3.2%	3.0%	2.8%	2.6%	2.4%	2.2%
15	1485%	4.7%	4.5%	4.3%	4.0%	3.7%	3.4%	3.2%

Finally, the park evaluated management considerations such as the capacity to effectively manage partnerships, fostering competition and visitor choice, and the ability to collect data from a range of businesses.

Appendix F: Cost Forecasts

Limited Climbing CUA

Division	Purpose	Grade	Hourly Rate	Hours	Total
Concession Mgmt. Specialist	Contacts with permittee, preparation of permit, & monitoring	GS 9/4	\$38.78	3	\$ 116.34
Management Specialist	Reviewing, approving, signing permit	GS 12/7	\$60.63	1	\$ 60.63
Administration (Finance)	Remit funds, deposit check & receipt	GS 5/05	\$26.07	1	\$ 26.07
Climbing Ranger	Monitoring	GS 7	\$20.14	5	\$ 100.70
Office Cost	Long Distance telephone calls, faxes, postage				\$ 30.00
Total					\$333.74
Total to charge					

Concession Test Climb

Division	Purpose	Grade	Hourly Rate	Hours	Total
Climbing Ranger	Test climb with a company as part of concession application	GS 9	\$29.29	10	\$292.9

Appendix G: Post-Trip Response Form

RMNP Commercial Guided Climbing Post-Trip Report

* Required

What is the name of your company? *

How many guides went on this trip? *

What is the name of the guide(s) on this trip? *

What was the date of this trip? *

How many clients went on this trip? *

Were these first-time or repeat clients for your company?

- First-time clients
 Repeat clients

What state(s) were your clients from? *

please use two-letter state abbreviations i.e. CO, TX, NE, KS, CA, etc., separated by commas

In which area of the park did you climb? *

select as many as apply

- Flattop/ Notchtop
 Mummy Range
 Lumpy Ridge
 Long's Peak/ Mt. Meeker
 Non-Technical Mountaineering
 Ski Mountaineering
 Avalanche Training
 Other:

What level of climbing did you do? *

select as many as applicable

- 5.3
 5.4
 5.5
 5.6
 5.7
 5.8
 5.9
 5.10
 5.11
 5.12
 5.13
 5.14
 5.15
 Other:

Did any member of your group require search and rescue from park staff? *

- Yes
 No

Did you assist with search and rescue for another climbing party? *

- Yes
 No

- Glacier Gorge
 Bear Lake
 Loch Vale
 Trail Ridge
 Other:

Which route(s) did you climb? *

please be as specific as possible

Which trailhead did you use? *

- Wild Basin
 Longs Peak
 Bear Lake
 Storm Pass
 Lily Lake
 Lily Mountain
 Twin Sisters
 Bierstadt Lake
 Glacier Gorge
 Lumpy Ridge
 Lawn Lake
 Tundra Communities
 Other:

What type of climbing did you do? *

select as many as applicable

- Single Pitch Rock Climbing
 Multi-Pitch Rock Climbing
 Ice Climbing
 Technical Mountaineering
 Non-Technical Mountaineering

Had you planned to climb at an alternate route/location but changed plans on the day of the climb?

- Yes
 No

If so, why?

- Overcrowding on the route/objective.
 Weather.
 Ability or health of client.
 Parking availability at trailhead.
 Other:

If so, where had you originally planned to climb? (location and route)

What type of stewardship activity did you engage in during your climb? (select all that apply)

- Removed trash from trail, trailhead, or crag.
 Removed tat from climbing route.
 Replaced anchor.
 Helped to maintain trail.
 Encouraged the use of wag bags.
 Prevented gardening on the route.
 Prevented the stashing of gear.
 Other:

Appendix H: Draft Press Release for Limited-Trip CUAs

Rocky Mountain National Park is currently in the planning phase of developing a Commercial Services Strategy for guided commercial climbing in the park. The park has solicited public comment and input from a variety of different stakeholders and is evaluating that feedback and continuing to develop its strategy.

During 2015, the park will issue limited-trip Commercial Use Authorizations (CUA) for guided technical climbing in the park. These CUAs provide an opportunity for qualified mountaineering companies to access the park on a limited basis. In 2015 the park will issue one limited-trip CUA permit for guided technical climbing per company. Each permit will allow up to three non-consecutive calendar days of guided technical climbing in the park. The maximum number of clients allowed per day will be twelve. Trips will be subject to appropriate guide to client ratios as outlined by the park. Post-trip reporting will be required of all permit-holders.

To apply for a limited technical climbing CUA permit, a complete application packet must be submitted to the park's concession office a minimum of one month in advance of the first client day. Applications will be accepted any time after December 1, 2014.

These limited guided climbing CUA permits are only for 2015 and companies should only anticipate operating in the park during the 2015 calendar year. For a limited-trip CUA application packet or for any questions about the permits and the application process, contact the park's concession office at 970-586-1209 or 970-586-1365.

Appendix I: Climbing Specific Inspection



Rocky Mountain National Park

Commercial Services Inspection Report

Guided Climbing Inspection

Part 1 – General Information

Employee: _____ Date: _____ Time: _____

Location of Contact: _____

Type of Contact: unplanned planned surprise prearranged

Name of Company: _____

Name of Trip Leader: _____

Total Group Size: _____ No. of Employees: _____ No. of Clients: _____ Permit #: _____

Part 2 – Checklist

Please mark an (X) for all regulations observed in violation and a (✓) for regulations in compliance. Please annotate any violations in summary on back page.

Resource Protection/Sanitation

- _____ The guide is responsible for adhering to Leave No Trace practices at all times.
- _____ The guide shall be responsible for complying with all backcountry regulations regarding sanitation and litter.
- _____ The guide is required to practice and promote "clean climbing" techniques, including minimizing chalk, minimizing noise and erosion (off and on the rock), and respecting wildlife.
- _____ New fixed anchors may be placed in the park when necessary to enable a safe rappel when no other means of descent is possible or to enable emergency retreat during self-rescue situations.
- _____ Any fixed line installed for a trip will be removed upon completion of that trip.
- _____ Used existing trails to approach climbs.

Backcountry

- _____ A bivouac permit is required for all overnight trips.
- _____ All overnight stays must take place in an approved bivouac site.
- _____ Out of bounds camping in undesignated areas is prohibited.
- _____ Guides shall know and communicate to their clients applicable park regulations and policies relating to backcountry management.

Guide/Client Ratios

- _____ simple technical skills classes 1:6, single pitch terrain 1:5, multi-pitch rock climbing 1:2, basic alpine terrain 3:1, advanced alpine terrain 2:1, Ski terrain 1:5 to 1:2 as difficulty increases
- _____ Group size was 20 or fewer people on formal trail corridors; 7 or fewer people elsewhere

Safety

- _____ All guides are required to have a radio or satellite phone and to carry it in the field.
- _____ Guides must be certified in a minimum of CPR, LNT & WFR.
- _____ Guides shall carry adequate equipment to perform emergency repairs to mountaineering equipment in the field.
- _____ Guides shall carry first aid equipment adequate for emergency treatment of common mountaineering injuries in the field.
- _____ The wearing of safety helmets will be encouraged where appropriate, and helmets must be offered to all clients.

Identification

- _____ Guides are required to carry proper Park pass at all times and also wear some form of identification, such as a uniform, nametag, or patch while working in the park.

Customer Service/ Knowledge of Park Resources

_____ Guides shall be familiar with park climbing areas and communicate any special requirements/ regulations.

_____ Guides shall provide clients with information regarding safety processes, NPS mission, park purpose and significance, park history, resource protection & stewardship philosophy, and LNT & wilderness climbing ethics

Part 3 – Inspection Summary

Based on observations and discussions with leaders and clients, the opinion of the employee listed above regarding the contacted company's sensitivity and understanding of the following:

NPS Mission and Park Values including Park Purpose and Significance:

Customer Service:

LNT Principles & Wilderness Climbing Ethic:

Safety:

Park Regulations & Local Resource Protection:

Proposed Corrective actions:

Part 4 – Resource

If this inspection is being conducted by an employee other than from the Business Programs Office; please indicate the time required to locate the group, then return to other duties: _____ and the time spent with the group: _____