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October 25, 2018

Mr. Woody Smeck
Superintendent
Sequoia and Kings Canyon National Parks
47050 Generals Highway
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Email: woody_smeck@nps.gov

RE: American Mountain Guides Association comments on 2020-2021 Wilderness Commercial Use Authorization Program Changes

Dear Superintendent Smeck,

The American Mountain Guides Association respectfully submits these comments for inclusion in the public record regarding proposed changes to the wilderness commercial use authorization (CUA) program at Sequoia and Kings Canyon National Parks (SEKI) in 2020-2021.

The American Mountain Guides Association (AMGA) is a 501(c)(3) educational non-profit organization that provides training and certification for climbing instructors, mountain guides, and ski guides throughout the United States. Founded in 1979, the AMGA has trained over 13,000 climbing and skiing guides who provide outdoor experiences for the general public that emphasize safety, stewardship, and education. As the American representative to the International Federation of Mountain Guide Associations (IFMGA), the AMGA institutes international standards for the mountain guiding profession in the United States and serves as an educational body for land management agencies, guide services, outdoor clubs, and others wishing to establish internationally-recognized standards for guided climbing and skiing activities. The advocacy arm of the AMGA supports sustainable use of public lands, facilitates stewardship opportunities, and works in cooperation with guides and land managers to promote best practices and preserve access to areas utilized by the guided public.

We have prepared the following comments in consultation with regional mountaineering and backpacking guide services and guides, including 8 guide services that are current or previous CUA holders in SEKI. The broad consensus that these comments represent is a demonstration of a strong, unified desire for SEKI to make changes to the CUA program in 2020-2021. Please note, the following comments account for the limits on commercial services set forth in the Wilderness Stewardship Plan (WSP) and offer solutions that are consistent with those requirements.

1. Implement “Limited CUAs, Fixed CSD Allocation” Commercial Service Day Allocation Method

Observations from the 2018 season suggest the current commercial service day (CSD) allocation method (“Limited CUAs, Hybrid CSD Allocation”) is not meeting the park’s desired outcomes for market competitiveness, fairness, efficiency, and business stability. Furthermore, the current allocation method is not adequately serving the needs of the public or working in concert with the way guide services do business. The following issues have been identified:

- In the 2018 season, all of SEKI’s commercial service days were not used. The current allocation method provided all operators with the same number of CSDs in the Mount Whitney Management Area (MWMA) and Wilderness Wide (WW). Some operators did not use all of the CSDs allocated to them, while other operators could have used more CSDs. As a result, the opportunity for the public to climb with a guide in SEKI was not maximized. This situation is in stark contrast to the park’s intent to maximize efficiency with few-to-no unused CSDs.
- By allocating CSDs in equal amounts to all CUA recipients, SEKI did not account for variations in business models from one operator to another. Longstanding, local operators have a greater capacity to utilize CSDs whereas operators who are visiting from outside the area may intend to operate only a single trip. Consequently, some operators received more days than they could use and others received much less than they could use.
- The first-come, first-served pool (FCFS) for the MWMA did not serve its intended purpose of maximizing market competitiveness. There were many more applicants to the FCFS pool than days available. As a result, a multitude of requests were submitted at the moment the FCFS pool opened and the allocation of CSDs ultimately depended upon where in the queue an operator’s request happened to fall. This process did not support market dynamism or enhanced competition, as intended by the park. It resulted in allocation by chance. Allocating CSDs based upon chance is strongly at odds with the park’s intent to maximize market competitiveness.
- The MWMA FCFS pool also undermined business stability. Guide services were unable to plan for future programming, marketing, and business investment when it was unclear if FCFS pool days would be available to them.
- Furthermore, because the MWMA FCFS pool allocation was largely based upon chance rather than market competition, it did not support the park goal of maximizing fairness.

To fix these problems, we recommend the park utilize the allocation method described in the last CUA application period as “Limited CUAs, Fixed CSD Allocation.” In this allocation method, allocations are divided into several different use levels. All CSDs are allocated in the initial application period and the first-come, first-served pool is used only as a clearinghouse for relinquished or redistributed CSDs. The table below provides an example of a Limited CUAs, Fixed CSD Allocation method with CSDs distributed in high, medium, and low-use levels.

Total Non-Stock CUAs = 23 WW, 15 w/MWMA	Wilderness Wide (WW)	MWMA
High Level CSD Allocations Available	3	3
CSDs per High Use Allocation	448	155
Medium Level CSD Allocations Available	15	7
CSDs per Medium Use Allocation	180	65
Low Level CSD Allocations Available	2	2
CSDs per Low Use Allocation	18	5

Table 1. Example allocation of commercial service days using a Limited CUAs, Fixed CSD Allocation method

Dividing the allocations into high, medium, and low-use levels maximizes the use of all available CSDs, increases fairness in the allocation process, improves competition, and supports business stability. These improvements will be accomplished as follows:

- **Maximize Use of Available CSDs** – By providing multiple allocation levels, the distribution of CSDs better matches operators’ capability to utilize them. As a result, few-to-no CSDs go unused. Operators may relinquish CSDs at any time to an improved FCFS clearinghouse. Relinquished CSDs may be requested by other operators who have used all of their allocation.
- **Maximize Fairness** – With a variety of allocation levels, CSD distributions will better accommodate the array of business models that serve the public. More CUAs are offered overall, increasing opportunities for both established businesses seeking larger allocations and new entrants seeking smaller allocations. Low-use level CUAs match the needs of operators based on the Inyo National Forest with limited use in SEKI. Medium-use level CUAs are sufficient for a single west-side trip. High-use level CUAs enable longstanding, established businesses to operate in manner similar to past years. All use levels can be augmented with educational trips, if desired.
- **Maximize Competition and Customer Service** – Competition is maximized by issuing all CSDs in the final round. An improved FCFS pool is used for relinquished and redistributed CSDs only, ensuring the FCFS pool is not a source of “allocation by chance.” Operators provide service based on a known allocation of CSDs, enabling them to book trips at any time without a dependence upon FCFS pool CSDs.
- **Maximize Business Stability** – By allocating all CSDs in the final allocation round, operators can effectively plan for business operations based upon a known allocation of CSDs. An improved FCFS system removes ambiguity and allows operators to accurately predict business volume.

2. Establish a multi-jurisdictional permitting authority with Inyo National Forest.

At present, there are six (6) mountaineering guide services authorized by the Inyo National Forest to conduct mountaineering activities that are held almost exclusively within the Inyo National Forest but which may cross into SEKI when traveling on the Sierra Crest. This use has been acknowledged by SEKI to be unverifiable and too trivial or minor to merit consideration in reporting of CSDs. As stated in the 2018 SEKI CUA Handbook, page 12:

De minimis entry is a term used by SEKI to distinguish use along the Sierra Crest where entry into the park is unverifiable and too trivial or minor to merit consideration in reporting of CSDs.

We recommend SEKI establish a multi-jurisdictional permitting authority to allow Inyo National Forest to manage these uses. Such an authority will alleviate numerous problems and provide significant benefits for guide services, the public, and the agencies.

- Business security for local guide service operators on the Inyo National Forest will be significantly improved. Under current conditions, if an Inyo operator is not granted a SEKI CUA, their entire business on the Inyo National Forest is rendered inoperative. Considering SEKI CUAs are up for re-application every two years and there is no preferential right of renewal, Inyo-based businesses hold a grave concern that their entire business could be shuttered at any time. By allowing Inyo National Forest to administer use that occurs along the Sierra Crest where entry into SEKI is unverifiable, business security will be substantially improved for those operators who hold Inyo National Forest permits.
- The public will be assured an opportunity to climb the high peaks of the Sierra Crest from the east side. These trips are in high demand by the public due to shorter overall trip lengths compared to trips that originate on the west side.
- Administration will be reduced by allowing one agency to manage use on behalf of both agencies.

Some Inyo National Forest permittees may still prefer to apply for two separate permits. This option should remain. Also, *de minimis* use administered by Inyo National Forest should not reduce the overall number of CSDs available for SEKI CUAs. By definition, *de minimis* use is too trivial or minor to merit consideration in reporting of SEKI CSDs. Therefore, this use should not require the use of SEKI CSDs. However, all *de minimis* entries into SEKI should be tracked via Inyo National Forest post-use reporting and a complete accounting of *de minimis* entry days should be provided to SEKI at the conclusion of each season.

3. Adjust the Mount Whitney Management Area boundary to exclude lower-visitation areas

The Mount Whitney Management Area (MWMA) was designated with the intent to improve natural and social conditions in the most popular and frequently visited areas near Mount Whitney. We recognize the need to implement unique management designations in high visitation areas such as this. However, there are numerous areas currently included within the MWMA that

do not see high rates of visitation and do not warrant the additional use constraints imposed by the MWMA designation. Examples include Miter Basin, the Wales Lake area, and the Wallace Lakes area. These areas contain high quality mountaineering objectives that currently see few visits, such as Mount Hale, Mount Young, and Mount Russell. If these areas were excluded from the MWMA, enabling guide services to visit them using Wilderness Wide (WW) CSDs, it would help to disperse use in the park, provide more diverse opportunities for the public, and reduce impacts.

4. Remove the provision in the Conditions of Specified Uses for Mountaineering and Backcountry Ski Mountaineering that prohibits technical rock climbing

Mountaineering is the most comprehensive form of mountain travel, and, by its very nature, includes technical rock climbing, snow climbing, and ice climbing. The blend of technical challenges in mountaineering is what draws thousands of dedicated followers to the sport. It appears to be nonsensical to prohibit technical rock climbing from mountaineering when the two are intricately connected. This is especially true in the Sierra Nevada, where examples abound of mountaineering routes that include world class technical rock climbing. Therefore, we strongly encourage SEKI to remove the language in the Conditions of Specified Uses¹ for Mountaineering and Backcountry Ski Mountaineering which states, “Technical rock climbing is not authorized under the Mountaineering Commercial Use Authorization and is prohibited.”

If the language prohibiting technical rock climbing has another intent, for example to discourage top-rope rock climbing instruction, which in some cases may have adverse effects on vegetation at the base of cliffs, we are supportive of inserting new language that addresses these concerns. Top-rope rock climbing could be excluded from the CUA authorization while still allowing technical rock climbing to occur in the pursuit of mountaineering objectives.

5. Continue using established criteria to evaluate an applicant’s qualification to provide guided mountaineering and ski mountaineering services for the public

We support the baseline criteria used in past years for mountaineering and ski mountaineering Lead Guides, which states “AMGA Alpine Guide Certification, AMGA Ski Mountaineering Guide Certification, IFMGA Certification, or Equivalent Certification documented through training and experience.” AMGA certifications are specifically designed to demonstrate a guide’s qualification to provide guided experiences for the public. By using AMGA certifications as a baseline criterion, SEKI will have a helpful benchmark by which to assess applicants and ensure all operators are sufficiently qualified to maximize visitor safety and provide quality visitor experiences. We also support the use of the “or equivalent” language to account for some situations where a guide may have training and experience that is equivalent to an AMGA certification.

6. Establish an additional pool of winter-season commercial service days

An additional pool of winter-season commercial service days should be established to provide the public with expanded opportunities to experience SEKI wilderness in winter. Currently, due to use restrictions, which are intended to limit use during the busy summer season, there are few

¹ 2018 Sequoia and Kings Canyon National Parks Wilderness CUA Application, Conditions of Special Uses, pages 17-18.

opportunities for the public to climb and ski and with a guide in SEKI during the winter. To ensure there is no overlap with summer use, winter-season CSDs could be confined to a specific date range such as November 1 – May 15. We believe this presents an excellent opportunity to expand opportunities for the public during a period when there is little concern for social impacts and travel has minimal impact on the environment (predominately travel over snow).

7. Do not increase the application fee to \$800.00 (maintain current application fee)

We understand NPS is required to recover administration and management costs associated with the issuance of CUAs. We also recognize NPS may go beyond cost recovery and charge a market price. However, in a review of fees charged at other climbing parks, it is readily apparent that SEKI’s proposed application fee of \$800.00 is higher than all other parks.

National Park Unit	CUA Application Fee	CUA Administrative Fee	CUA Monitoring Fee	% of Gross Revenue (payable after % of gross revenue exceeds application fee)	Fee Administration Method
Mt. Rainier	\$100	\$200	\$275	None	Cost Recovery
Denali NP&P	\$200	None	None	6%	Market Price
Black Canyon	\$200	None	None	None	Cost Recovery
Colorado National Monument	\$250	None	None	None	Cost Recovery
Olympic National Park	\$100	None	None	3%	Market Price

Table 2. Fees charged for mountaineering and rock climbing CUAs at National Parks with climbing

Furthermore, Reference Manual 48B, Chapter TBD on Management of CUA Fees², states, “For Commercial Use Authorizations providing primarily recreation services, NPS may assess a reasonable fee of 3% of gross receipts for operations that gross less than \$250,000.” We support a reasonable fee of 3% of gross receipts. A fee of this amount is common among other land agencies including the U.S. Forest Service and the Bureau of Land Management. However, SEKI’s proposed application fee of \$800.00 will easily exceed 3% of gross receipts for many, if not all, operators. This is especially true for guide services that operate primarily on the Inyo National Forest, with *de minimis* entry into SEKI, and guide services from outside the area that conduct only a single trip. For these reasons, we strongly encourage SEKI to maintain the current application fee and not increase the fee to \$800.00.

² Reference Manual 48B, Chapter TBD, Management of Commercial Use Authorization Fees, Page 5

8. Allow ratios up to 6:1 for mountaineering and backcountry ski mountaineering

It is common practice in the guiding industry for mountaineering and backcountry ski mountaineering trips to be conducted at ratios up to six clients per guide when traveling in non-technical, non-glaciated terrain with favorable conditions and appropriately trained clients. Ratios up to six clients per guide are also common during education-focused, instructional programs that cater to introductory experiences,³ such as basic mountaineering classes or introductory avalanche awareness and backcountry skiing programs. This is well documented in requirements put forth by the outfitter and guide insurance industry, the American Avalanche Association who sets standards for avalanche awareness courses, and through examples set by other National Park units.⁴ For reference, these examples are documented in Appendix A. In keeping with standard practices across the industry, we urge SEKI to allow guide to client ratios up to 6:1 for mountaineering and backcountry ski mountaineering activities.

9. Clarify the rating criteria and evaluation process to improve understanding for all applicants

In the last CUA application process, there was confusion around the application criteria and how applications would be evaluated. For the upcoming application round in 2020-2021, we encourage SEKI to clarify the rating criteria and evaluation process. Reference Manual 48B, Chapter TBD on Limiting CUAs,⁵ states, “Fully describe the rating criteria and evaluation process. Park staff must develop rating criteria and should consider basing rating criteria on applicant response to resource protection, visitor safety, and relevant experience questions, at a minimum. The solicitation must describe the evaluation process.”

Comments on Other Proposed Changes

Increase the number of CUAs that may be issued with WW CSD Allocations – this proposed change is consistent with our previous recommendation to change the allocation method to “Limited CUAs, Fixed CSD Allocation” which will allow additional CUAs to be offered (among other improvements as described in recommendation #1).

Reallocate Base CSD and First Come First Served (FCFS) Pool split using an 80% 20% Allocation model for WW Allocations – we recommend changing the allocation method to one in which the FCFS pool is utilized for relinquished and redistributed CSDs only. This will maximize competition and improve fairness, as described in recommendation #2. Increasing the total number of CUAs can be achieved by changing the allocation method to “Limited CUAs, Fixed CSD Allocation” with high, medium, and low-use levels.

First-Aid and Medical Minimum Requirements by Activity – we support the proposed changes.

³ In the Wilderness Stewardship Plan Final Environmental Impact Statement, Appendix B, Extent Necessary Determination, page B-17, introductory experiences are stated to be critical to the mission of NPS: “The NPS considers the provision of such introductory experiences as critical to its mission, and recognizes that commercial services aid in this aspect of mission accomplishment.”

⁴ Rocky Mountain National Park, Guided Mountaineering Concession Contract 2015, Exhibit B in the Operating Plan, Page 8, “The ratio varies due to the degree of difficulty of the school or climb. Approved guide-to-client ratios (for) simple technical skills classes is 6:1.”

⁵ Reference Manual 48B, Chapter TBD, Limiting CUAs, Page 4

Minor modification to certification requirements for Mountaineering and Ski Mountaineering – we recommend SEKI continue using “AMGA Alpine Guide Certification, AMGA Ski Mountaineering Guide Certification, IFMGA Certification, or Equivalent Certification documented through training and experience” as the criteria for assessing mountaineering and ski mountaineering providers (see recommendation #5).

Changes to frequency of trip reporting and submission of trip Itineraries – we support the proposed changes.

Guide lists and certifications – we support the proposed changes.

* * *

Thank you for the opportunity to share our perspective on the proposed changes to the wilderness CUA program at Sequoia and Kings Canyon National Parks in 2020-2021. We look forward to supporting SEKI in implementing these changes for the benefit of the public, guide services, and the National Park Service.

Sincerely,



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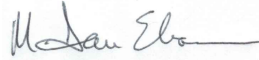
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APPENDIX A

Examples of allowable ratios for guided mountaineering and avalanche education inclusive of guided backcountry skiing

Figure 1: The American Avalanche Association (AAA) establishes guidelines for the conduct of avalanche education in the United States. As noted in the table below, the acceptable ratio for introductory, level 1 avalanche training and associated guided backcountry skiing is six students to one instructor:

Recreational Course Guidelines
Prepared by the AAA Education Committee

Table 1: Level 1 Avalanche Training

Program	Audience	Learning Outcomes	Core Curriculum Content	Pre-requisites	Format	Performance measures	Instructor Qualifications & Student:Instructor ratio
Level 1 Avalanche Training	*Current and aspiring backcountry travelers	<ul style="list-style-type: none"> -Access local avalanche bulletin and learn to understand & apply. -Describe where and why avalanches occur. Key components for formation. -Human Factors. Identify & apply simple decision tools to prepare for traveling in avalanche terrain. -Apply risk management tools: safety equipment, trailhead checks, and communication. -Learn procedures for Basic Companion Rescue: Skills Practical -Make key observations for snowpack and weather. -Practice snowpack tests appropriate for the current avalanche problems. -Identify avalanche terrain in the field. -Choose terrain appropriate for the current avalanche forecast & safe travel. Link participant objectives to terrain and avoiding Avalanche Problem. 	<p>Pre-Course</p> <ul style="list-style-type: none"> • Consider pre-course materials and study for student. <p>Avalanche Basics & Characteristics</p> <ul style="list-style-type: none"> • Avalanche types; Unstable snowpack conditions. • Size classification of avalanches. Incident statistics. • Terms common to: avalanches, terrain & snow. • Avalanche motion: glide, turbulence, speed- dry vs. wet • Identify Avalanche Problems (conditions, formation, characteristics). <p>Terrain</p> <ul style="list-style-type: none"> • Critical slope angles. Terrain features, shape, size. • Role of slope aspect and elevation to sun and wind. • Identify avalanche start zones, tracks, and run-outs • Critical terrain: traps, convexities, triggering. <p>Snowpack and Weather</p> <ul style="list-style-type: none"> • Mountain snowpack development: storms, intervals. Weather events leading to formation of strong and weak layers. Basic snowpack development/change. • Snow Climates; by region and within range-mountain location. <p>Information Gathering</p> <ul style="list-style-type: none"> • Access and understand information from the Avalanche Advisory. North American Avalanche Danger Scale. • Use of terrain/danger rose. <p>Planning, Communication & Decision-making</p> <ul style="list-style-type: none"> • Terrain, Snowpack, Weather discussion for trip planning • Use information to plan & prepare for field. Use of Maps/technology. • Human Factors. Managing Risk. • Use of decision tools, check lists, contingencies, emergency plans. Communication. • Application of Plan to Field. Tour group decision making prior to travel; safe travel for conditions. Relevant observations & objectives. • End of day review. Observations and reflections with group. <p>Making Relevant Observations</p> <ul style="list-style-type: none"> • Field observations: Critical Red Flag Obs.; Recognizing & prioritizing • Pairing appropriate observations with current avalanche problems and conditions • Use of avalanche & snow pit tools: inclinometer, compass, probe, saw, shovel, and thermometer. • Snowpack tests: snow pits: ID layers (hand hardness), basic grain types (strong & weak layers). Field identifying the Avalanche Problem. • Informal snowpack tests while traveling. 	<ul style="list-style-type: none"> -No formal Pre requisites -Strongly Recommended: • Winter Travel and First Aid Skills • Avalanche Awareness or Similar • Course provider's recommended reading. Pre-course work. <p>-Participants should have some experience in backcountry travel as required by Course Provider.</p>	24 hours Minimum: 60% field	<p>Attendance & participation</p> <p>Course Close:</p> <ul style="list-style-type: none"> • Recommendations for further skill development. • Limits of training • Value of Mentors • Preparation for Level 2 Avalanche Training 	<ul style="list-style-type: none"> -Primary or lead instructor: AAA Pro Member -Assistants: AAA Member Affiliates -Continuing education within previous 4 years -Instructors must be excellent role models for the skills they teach. <p>-Maximum 6:1</p>

Figure 2: Minimum eligibility requirements for guided mountaineering insurance with Atain Specialty Insurance Company, per the 2017 Application for Guided Recreation Insurance:

GUIDED ACTIVITIES - MINIMUM ELIGIBILITY REQUIREMENTS – PLEASE READ CAREFULLY BY AFFIXING MY INITIALS I HEREBY AGREE TO ADHERE TO THE FOLLOWING MANDATORY INSURABILITY REQUIREMENTS AS A CONDITION FOR OBTAINING INSURANCE COVERAGE		
PLEASE REVIEW AND INITIAL THAT YOU AGREE TO FOLLOW EACH REQUIREMENTS *** PLEASE READ EACH AND EVERY REQUIREMENT CAREFULLY ***		
No.	Initials	REQUIREMENTS FOR ALL ACTIVITIES – REVIEW & INITIAL 1-15
1.		A safety orientation and/or briefing shall be conducted for each participant that includes a description of the activity itself, the inherent dangers of the activity, safety precautions while underway and what to do in the event of an emergency or accident.
2.		You Agree to use a waiver that has been drafted and recommended by an attorney which recognizes the dangers of the activities. The waiver must be properly executed and obtained from all participants including a parent or legal guardian's signature for those participants under the age of 18 years. One waiver per participant is a requirement. Waivers that apply to multiple participants are NOT acceptable. Waivers must be kept on file for a minimum of three (3) years.
3.		Drugs and alcohol are prohibited. As such, you shall not allow any participant(s) to (a) participate when you know, suspect or believe that those individuals are or may be under the influence of alcohol or drugs (b) take or consume alcohol or drugs during the guided activities at any time.
4.		All applicable State and Federal safety standards for the operations are to be followed at all times during activities. Each participant will wear applicable safety equipment.
5.		The Primary /Lead Guide on the trip must be at least 21 years of age and have two years of guiding experience in the activity covered under this insurance and/or follow their State or Federal Qualification requirements.
6.		You shall have a minimum of one First Aid & CPR Certified (current) or First Responder trained person on each trip.
7.		Each Expedition or Trip shall have available a suitable, updated and adequately stocked first aid kit.
8.		You will have on each guided trip some form of emergency communication such as cell phone, radio or walkie talkies or other reliable communications capable of summoning assistance from remote locations such as a special whistle / sounding device
9.		You shall inspect all equipment / vehicles/ units / watercraft daily prior to the commencement of activities and make repairs where necessary to ensure your patron's safety. You will maintain and keep a written log of these inspections and repairs
10.		Records of each "Guided Activity" with times and dates must be maintained along with the waivers and including, incident / injury reports for a minimum of 3 years.
11.		<u>All</u> incidents regardless of severity will be reported to the company immediately.
12.		You shall have an emergency evacuation plan in the event of inclement weather.
13.		You shall have an emergency procedure in place for lost or late returning tours and trips.
14.		You shall, to the best of your ability, determine the client's physical ability to participate in the activity and ensure that they are properly attired for both the activity and the expected weather conditions.
15.		Employees must be properly trained and experienced in the operations; on all activities and agree to enforce all eligibility requirements.
<input type="checkbox"/> NO EXPOSURE (IF YOU CONDUCT GUIDED MOUNTAINEERING REVIEW & INITIAL 16-19)		
No.	Initials	REQUIREMENTS
16.		An industry accepted climbing helmet and safety equipment must be worn by all climbers. GUIDED MOUNTAINEERING
17.		All technical climbing equipment must be manufactured to standards similar to those established by the Union Internationale Des Associations d 'Alpinisme (IUAA). All other equipment must be purchased from a vendor that has significant knowledge of climbing equipment manufacturers. GUIDED MOUNTAINEERING
18.		Guide to customer ratio shall not exceed (1) Guide to (6) customers. GUIDED MOUNTAINEERING
19.		Climbers must be at least 6 years or age on their last birthday or have reached the age as Designated by law, whichever is greater - Climbers under 18 must have a parent with them OR a properly signed waiver. GUIDED MOUNTAINEERING

INSURABILITY REQUIREMENTS CONTINUED ON NEXT PAGE

Figure 3: Approved guide-to-client ratios for mountaineering services in Rocky Mountain National Park:

provided by this plan and current Service concession management guidelines are Service minimums. The Concessioner must make every effort to exceed these standards.

A) Required, Authorized, and Prohibited Visitor Services

- (1) *Required Visitor Services.* Instruction and Guide Services in Technical Mountaineering to include: Rock Climbing, Ice Climbing, and Technical Rescue Training.
- (2) *Authorized Visitor Services.* Avalanche training, and Instruction and guide service in non-technical mountaineering.
- (3) *Prohibited Visitor Services.* Guided hiking and overnight backpacking without climbing, and guided cross-country skiing are not authorized by this contract.

B) Backcountry Permits and Limits for Overnight Stays

- (1) A backcountry permit or bivouac permit is required for all overnight stays. Backcountry permits and bivouac permits are available on a first-come, first-served basis except for advance reservations. Backcountry permits must be requested by the Concessioner and are issued in the Concessioner's name. Out of bounds camping in undesignated areas is prohibited.
- (2) Backcountry campsites may be reserved in advance. For general information and reservations see <http://www.nps.gov/romo/planyourvisit/backcountry.htm>. A reservation fee applies and is subject to change. The Concessioner must make the reservations and the permits are issued in the Concessioner's name. Reservations must only be made when a client has booked a climb.

C) Climbing Policies and Practices

- (1) General
 - (a) The ratio of clients to guides for climbing schools and climbs must be included as part of the approved rate. The ratio varies due to the degree of difficulty of the school or climb.
 - i. Approved Guide Client Ratios
 - a. Simple technical skills classes 1:6
 - b. Single Pitch 1:5
 - c. Multi-pitch classes 1:2
 - d. Basic Alpine days 1:3
 - e. Advanced Alpine days 1:2
 - ii. Maximum group size is 12, not including guides.
 - (b) In order to ensure a quality climbing experience for visitors/clients, the concessioner is required to book trips in advance on a shared Google Calendar. Each trip must be scheduled on the shared Google Calendar at least 24 hours in advance. The following information is required for each schedule trip: The name of the company, intended activity/route, date(s), start and end times, location, and number of clients and guides. Booking trips on the calendar allows all the concessioners to self- manage routes and trips to avoid over-crowding a route or area, thus degrading the visitor's experience.
 - (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 that 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. Fixed ropes or sling steps must be removed each day at the end of the climb.
 - (d) 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. The infrequent placement of new fixed anchors is allowed when ascending a route to connect terrain that is otherwise protected by removable anchors (e.g. one crack system or other natural feature to another), or when there are no features which will accommodate removable equipment but the occasional placement of a fixed anchor may provide a modicum of safety during an ascent (e.g. traditional face climbing). The