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Colorado Parks and Wildlife Commission  
c/o Commission Assistant  
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Email: [dnr\\_cpwcommission@state.co.us](mailto:dnr_cpwcommission@state.co.us)

**RE: American Mountain Guides Association Comments to Eldorado Canyon State Park Draft Management Plan**

Dear Colorado Parks and Wildlife Commission Members:

The American Mountain Guides Association respectfully submits these comments to the Eldorado Canyon State Park (ECSP) Draft Management Plan (“Draft Plan”).

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 backcountry 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 managers, guide services, outdoor clubs, and other recreation stakeholders. The advocacy arm of the AMGA supports sustainable use of public lands, facilitates stewardship projects, and works in cooperation with guides and land managers to promote best practices and preserve access to areas utilized by the guided public. The AMGA has held a special use permit to provide professional guide training courses in Eldorado Canyon State Park for over 20 years.

**Recreation Special Uses**

Recreation special uses such as outfitting and guiding provide substantial benefits for the public, state parks, other public lands, and local communities. In an increasingly urban society, outfitters and guides connect people to the outdoors and foster an appreciation for public lands. They provide valuable interpretation of natural and cultural resources, they promote an ethic of conservation and stewardship, and they help to foster the next generation of public lands advocates. Outfitters and guides also support local communities by contributing to the vibrant and growing outdoor recreation economy. To ensure outfitting and guiding services in ECSP continue to provide these benefits, we offer the following comments on the Eldorado Canyon State Park Draft Management Plan.

## Guided Rock Climbing in ECSP

The Draft Plan acknowledges that

Special Use Permits are given to rock climbing guides and educators and companies that wish to operate in the Park, throughout the year, on a continual basis. In 2019, the Park issued 16 permits for commercial operations in the park. These guided trips provide a valuable opportunity for visitors to experience the park in a unique way.<sup>1</sup>

The AMGA agrees that guided trips provide a valuable opportunity for visitors to experience the Park in a unique way. Guides help people from all walks of life access the world-renowned climbing resources at ECSP by providing instruction, equipment, and interpretation of park resources. Guides also enhance safety—which is of particular importance at ECSP where the climbing is challenging, the routes are largely traditional, and the weather is dynamic.

The Draft Plan also states that Colorado Parks and Wildlife (CPW) “may need to limit the number of [special use] agreements and/or when they can be used during busy seasons.”<sup>2</sup> If CPW is contemplating changes to the special use permit system, we encourage CPW planners to first gather specific data on the amount of use by permit holders, the areas they visit, and other patterns of visitation (group size, time on climbs, etc.). While the Draft Plan documents overall ECSP visitation, the Draft Plan provides no data regarding the activities of special use permit holders. On most public lands where climbing guides operate, guided climbing parties represent a very low percentage of the overall visitation and consequently have comparatively little impact on resources and other visitors. Furthermore, guides are highly competent visitors who help to interpret park resources, reinforce park rules, espouse safe climbing practices, and promote a Leave No Trace ethic. With these considerations in mind, we believe reducing the presence of guides—even during the busy season—will have a deleterious effect on park resources. Moreover, the management strategy of modifying the number special use permits (or permitted times of use) may be unnecessary given the Draft Plan acknowledges that 100% of climbers surveyed rate their experience as excellent or good, with other users providing similarly very high marks for their quality of experience.<sup>3</sup>

If modifications to the permit system are considered in the future, the AMGA supports the intent of CPW planners to work with permit holders.<sup>4</sup> By involving permit holders and other stakeholders in the planning process, CPW will gain insights to produce management strategies that will be effective and widely utilized.

### Pilot Reservation System

The AMGA also has concerns about the proposed pilot reservation system. The Draft Plan clearly states that visitors report a high level of satisfaction (climbers reported 100% satisfaction) with current recreation experiences and report very low displacement rates.<sup>5</sup> This data suggests a reservation system is unnecessary. Additionally, we believe the reservation system as proposed

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<sup>1</sup> Draft Plan at p. 96.

<sup>2</sup> Id.

<sup>3</sup> Draft Plan at p. 82.

<sup>4</sup> Draft Plan at p. 96.

<sup>5</sup> Draft Plan at p. 82.

will result in significant unintended negative consequences, particularly for rock climbers. For example, requiring climbing visitors to adhere to a specific time frame for their climbs could expose them to elevated risks related to inclement weather and time constraints on long, traditional climbing routes.

If ECSP does pursue a pilot reservation system, AMGA believes permit holders should be exempt from such a system as is common practice at nearby public lands, such as Rocky Mountain National Park. Permit holders' activities are already permitted and monitored through the special use permit system and additional oversight through a general reservation system would be unnecessary and redundant. Furthermore, it would be difficult for permit holders to adequately meet their customers' needs under the constraints identified in the proposed pilot reservation system. Many bookings with guides to climb in ECSP occur the day immediately prior to the climb, and moreover the selection of ECSP for a climb with a guide is very often a last-minute and spontaneous secondary "plan B" due to inclement weather elsewhere (often in high country where the "plan A" is scheduled). Because of these dynamics a reservation system would make booking clients difficult and impose a significant burden on guiding in ECSP.

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Thank you for the opportunity to provide comments on the Eldorado Canyon State Park Draft Management Plan. We look forward to working with Colorado Parks and Wildlife to promote the appropriate use of Eldorado Canyon State Park while protecting high quality recreation and natural resources at the same time.

Sincerely,



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