



January 31, 2023

Superintendent Sidles
Rocky Mountain National Park
1000 US Highway 36
Estes Park, CO 80517

Via email: Darla_Sidles@nps.gov

RE: Rocky Mountain NP Day Use Visitor Access Strategy

Superintendent Sidles,

Please consider the following comments regarding scoping for the Rocky Mountain NP Day Use Visitor Access Strategy. Access Fund and Boulder Climbing Community (BCC) appreciate this opportunity to share climbing community perspectives on the proposed day use visitor access strategy. We understand that park management believes that increased visitation has resulted in the need for new strategies that improve visitor experience and protect park resources.

The mission of the BCC is to mobilize the local community and partners to care for the environments we impact as climbers and enrich the outdoor experience for all. The BCC is a non-profit organization that connects and supports climbers, climbing organizations, land managers, and businesses in the Front Range, in order to protect and care for the climbing areas we love. For more information on the BCC, visit www.boulderclimbers.org.

Access Fund is a national advocacy organization and accredited land trust whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit supporting and representing over 8 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—Access Fund is the largest U.S. climbing advocacy organization with over 20,000 members and 130 affiliates. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach for climbing areas across the country. For more information about Access Fund, visit www.accessfund.org.

Comments

Rocky Mountain NP affords world-class opportunities for many forms of climbing and mountaineering. Although climbers represent a small percentage of the total annual visitation, climbing is a longstanding activity that is integral to the history and fabric of Rocky Mountain NP and the surrounding communities. Climbers access many areas of the park that are not visited

by the general public. Therefore, it is important for the visitor access strategy to consider the unique behavior patterns and needs of climbers so that access is not unintentionally or unnecessarily restricted.

In general, climbers depend on the flexibility to climb when weather conditions afford opportunities for safety and enjoyment, and this is especially true in Rocky Mountain NP. An overly restrictive system that precludes climbers from taking advantage of good-weather days creates additional dangers for climbers. Our suggestions reflect our ethos of conservation, sustainability, equity and adventure.

General Access to Rocky Mountain NP

We are not certain that Rocky Mountain NP requires a timed-entry permit system at this time and many of our members raise pragmatic concerns regarding the efficacy of the current system. However, recognizing the park's interest in further modifications to the current timed-entry system, we offer the following specific suggestions.

1. A substantial portion of the timed-entry reservations should be held open for day-before reservations. Climbing often depends on last minute decisions to ensure an acceptable margin of safety so the availability of day-before reservations is critical to the climbing community. We suggest that at least 25% of the total daily reservations be held open until the day before. Or, at the very least, it should be 25% for the pre-noon reservation windows which are the ones of greatest interest to persons concerned about the weather.
2. The timed-entry reservation system should allow users to enter through any entrance station. For various reasons including weather, available partners and time constraints, climbers often need to change plans. It is unwise to force someone with, for example, a Longs Peak-specific reservation to climb (or hike) there when circumstances dictate that they choose a less-ambitious destination.
3. It is our understanding that the timed-entry reservation system's daily, and two-hour window, quotas are determined by the estimated total carrying capacity of the park and that the total carrying capacity was determined by estimates of the parking and trail capacities. We hope the park will provide additional clarity on the details of its estimates of the carrying capacity and how the carrying capacity was estimated so that the public can provide better stakeholder input during this planning process. This sort of transparency is essential to being able to evaluate a proposed change and comprehensively understand the pending draft alternatives. If, despite our opposition, the park proposes a system of entrance station-specific reservations, then the above information should also be provided at the entrance station-specific level so the public can understand how the carrying capacity estimates are allocated across the different entrance stations, and the basis for that allocation.

4. The existing 9am-3pm reservation windows during high-season for Lumpy Ridge, Lily Lake, Longs Peak, Wild Basin, and other non-Bear Lake corridor areas are acceptable for the majority of climbers.

Longs Peak Visitor Access

The BCC and AF have some comments specific to the Longs Peak area. In preparing these comments we are informed by a survey we conducted of Longs Peak climbers (158 local respondents) to make sure we understand their concerns and interests.

1. We question the need for any permit system (beyond parking restrictions) that would limit usage of resources accessed via the Longs Peak Trailhead. But, if any such permit system is considered, permits for climbing on Longs Peak should only be considered for the Keyhole Route (beyond the Long's Boulderfield). The Keyhole Route attracts several orders of magnitude more users than all the other technical and semi-technical routes on Longs combined and is the site of the majority of SAR events: an estimated 10-15,000 people hike the Keyhole Route a year; 20% of all National Park rescues happen in the Longs/Mount Meeker zone.¹

2. Educational Requirement: Following the suggestion made by park personnel, we support a requirement that all users of the Longs Peak Trailhead read educational material relating to safety on Longs. This could be accomplished through an online education portal. The Longs Peak visitor should only be required to read the material once, not each time they get a reservation.

We support the educational requirement with two caveats. First, this should not be a first step to quotas or additional permitting: it should be seen as a user-friendly way to get helpful safety-related information into the hands of users who may be unfamiliar with, for example, the risk of lightning or the long and technical nature of the Keyhole Route. Second, this should not be seen as a reason to require all Longs Peak users to get reservations, regardless of how early they start. We recognize that it is less easy to get educational material to people who arrive very early, and thus have no need to access an online reservation system. However, with proper signage, outreach, and trailhead literature, much of the educational objectives can be achieved even for those who don't have a reservation.

3. Voluntary Community Sign-in Board: We recommend creation of a system, or systems, for climbers headed to the Diamond to identify what route they intend to climb. This will help those who are arriving later to understand both how much Diamond traffic to expect that day and also what routes are being used (and by how many). Learning that information at the trailhead, rather than at the base of the North Chimney or on Broadway, can help climbers decide whether to come back another day or change their intended route. The system could be both a physical

¹"A Statistical Analysis of Climbing on Fatalities While Climbing Longs Peak," *Rocky Mountain Journal*: March 25, 2021.

<http://rockymountainhikingtrails.blogspot.com/2021/03/a-statistical-analysis-on-fatalities.html>

sign-in board at the trailhead and could also have an online feature, which the BCC could host. Although participation in the system should be strongly encouraged, there should be no penalty for climbers who end up doing a different route than the one they had planned. For many reasons, such as unexpected wetness, parties need the ability to adjust their plans after arriving at, or even being up on, the Diamond.

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Access Fund and BCC are interested in assisting the park with the Day Use Visitor Access Strategy as well as other climbing-related issues. Please reach out to Erik Murdock (erik@accessfund.org) or Kate Beezley (kate@boulderclimbers.org) with any questions.

Sincerely,

Kate Beezley, Boulder Climbing Community Executive Director

A handwritten signature in black ink that reads "Erik Murdock". The signature is written in a cursive, slightly slanted style.

Erik Murdock, Access Fund VP of Policy and Government Affairs