



# United States Department of the Interior



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NATIONAL PARK SERVICE  
Interior Regions 8, 9, 10, and 12  
555 Battery Street, Suite 122  
San Francisco, CA 94111

IN REPLY REFER TO:  
9.C. (PW-PC)

January 29, 2024

To whom it may concern:

In accordance with [43 C.F.R. § 2.67](#), we have posted 161 pages of Annual Overall Rating Reports (AOR's) for Crater Lake Hospitality, LLC from 2019-2023 with portions of 23 pages having been withheld under FOIA Exemptions 4 and 6. Exemption 4 protects “trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential.” [5 U.S.C. § 552\(b\)\(4\)](#). The withheld information is commercial or financial information obtained from person because the term “person” under the FOIA includes a wide range of entities, including corporations. Exemption 6 allows an agency to withhold “personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy.” [5 U.S.C. § 552\(b\)\(6\)](#). The information that has been withheld consists of personal information, including names, and we have determined that the individuals to whom this information pertains have a substantial privacy interest in withholding it.

If you have additional questions regarding FOIA, you may contact [nps\\_pwr\\_foia@nps.gov](mailto:nps_pwr_foia@nps.gov).

INTERIOR REGION 8 • LOWER COLORADO BASIN\*  
INTERIOR REGION 9 • COLUMBIA—PACIFIC NORTHWEST\*  
INTERIOR REGION 10 • CALIFORNIA—GREAT BASIN  
INTERIOR REGION 12 • PACIFIC ISLANDS

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AMERICAN SAMOA, ARIZONA\*, CALIFORNIA, GUAM, HAWAII, IDAHO, MONTANA\*,  
NEVADA, NORTHERN MARIANA ISLANDS, OREGON, WASHINGTON

\*PARTIAL

**United States Department of the Interior - National Park Service**  
**Annual Overall Rating Report**  
*Contract Information*

**Instructions:** Fill in the corresponding contract information.  
 Note: To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

Year of Operation: **2019**

Park	Crater Lake National Park	Contract Term Effective Dates	11/1/2018 - 10/31/2028
Concessioner Name	Aramark	Concessioner Doing Business As	Crater Lake Hospitality, LLC
Contract Number	CRLA004-18		
Evaluator Name	(b) (6)	Date of Review	12/31/2019

Please indicate below whether the following criteria areas apply to the concessioner being evaluated

Program Area	Applicability (Yes/No)	
Environmental	Yes	Applicable to all 1998 Law Contracts
Public Health	Yes	Applicable to contracts with one or more of the following services: food & beverage, swimming pools, and thermal baths
Asset Management	Yes	Applicable to all Category I and II Contracts

**Service Types**

**Instructions:** Add an X next to all applicable service category provided under this Contract. Scroll over service category for a list of all sub-categories.

Air		Lodging	X
Automobile Services	X	Other	X
Boats		Recreation	X
Food and Beverage (F&B)	X	Retail	X
Horse & Mule		Transportation	
Land		Water	X

**United States Department of the Interior - National Park Service**  
**Form 10-AOR - Annual Overall Rating Report**

Year of Operation: 2019

Park: Crater Lake National Park

Contract Term Effective Dates: 11/1/2018 - 10/31/2028

Concessioner Name: Aramark

Concessioner DBA: Crater Lake Hospitality, LLC

Contract Number: CRLA004-18

**Table 1: AOR Score**

Category	Scores	Adjusted Scores	Rating
Administrative Compliance (10-ADM)	66.7	66.7	Marginal
Operational Performance (10-OPR)	68.3	68.3	Marginal
Public Health (10-PHP)	91.7	84.0	Marginal
Risk Management (10-RMP)	30.4	30.4	Unsatisfactory
Environmental Management (10-EMP)	28.6	28.6	Unsatisfactory
Asset Management (10-AMP)	22.2	22.2	Unsatisfactory

AOR Score

51.3

Adjusted AOR Score

50.0

Rating

Marginal

Superior = 90 – 100  
 Satisfactory = 70 – 89  
 Marginal = 50 – 69  
 Unsatisfactory = ≤49

**Notes:**

- The final AOR score is the average of all applicable category scores. The Adjusted AOR Score is used for ADM, PHP, RMP and EMP (see individual pages for details).
- If the Concessioner receives an Unsatisfactory on any of the forms, the final AOR score is capped at 69 and final AOR rating can not exceed Marginal.
- If the Concessioner receives a Marginal on any of the forms, the final AOR score is capped at 89 and final AOR rating can not exceed Satisfactory.
- If a periodic evaluation (10-OPR) has not been completed for the contract during the year of operation, the final AOR score is capped at 89 and final AOR score can not exceed Satisfactory.

**Table 2: Superintendent Approval / Signature**

**Superintendent Approval / Signature**

**Instructions:** The park superintendent has the authority to adjust the final concessioner AOR rating. Please use the space below to enter the final superintendent-approved rating. If the rating has been altered from the calculated rating (shown above), please also include notes to explain why the change occurred. Please see Tab "Instructions and TOC" for instructions on signing AOR.

Superintendent Approved Rating

**Marginal**

**Narrative** (explain reasoning for any changes made by the superintendent)

Superintendent's Signature CRAIG ACKERMAN Digitally signed by CRAIG ACKERMAN  
 Date: 2020.05.08 10:53:44 -07'00'

Date

Concessioner Signature  
 (to signify receipt of rating)

Date

**United States Department of the Interior - National Park Service**  
**Form 10-AOR - Annual Overall Rating Report**

Year of Operation: 2019

Park: Crater Lake National Park

Contract Term Effective Dates: 11/1/2018 - 10/31/2028

Concessioner Name: Aramark

Concessioner DBA: Crater Lake Hospitality, LLC

Contract Number: CRLAD04-18

**Table 1: AOR Score**

Category	Scores	Adjusted Scores	Rating
Administrative Compliance (10-ADM)	66.7	66.7	Marginal
Operational Performance (10-OPR)	66.3	66.3	Marginal
Public Health (10-PHP)	91.7	84.0	Marginal
Risk Management (10-RMP)	30.4	30.4	Unsatisfactory
Environmental Management (10-EMP)	26.6	26.6	Unsatisfactory
Asset Management (10-AMP)	22.2	22.2	Unsatisfactory

AOR Score	51.3
Adjusted AOR Score	60.0
Rating	Marginal

Superior = 90 - 100  
 Satisfactory = 70 - 89  
 Marginal = 50 - 69  
 Unsatisfactory = <50

**Notes:**

- The final AOR score is the average of all applicable category scores. The Adjusted AOR Score is used for ADM, PHP, RMP and EMP (see individual pages for details).
- If the Concessioner receives an Unsatisfactory on any of the forms, the final AOR score is capped at 69 and final AOR rating can not exceed Marginal.
- If the Concessioner receives a Marginal on any of the forms, the final AOR score is capped at 89 and final AOR rating can not exceed Satisfactory.
- If a periodic evaluation (10-OPR) has not been completed for the contract during the year of operation, the final AOR score is capped at 88 and final AOR rating can not exceed Satisfactory.

**Table 2: Superintendent Approval / Signature**

**Superintendent Approval / Signature**

**Instructions:** The park superintendent has the authority to adjust the final concessioner AOR rating. Please use the space below to enter the final superintendent approved rating. If the rating has been altered from the calculated rating (shown above), please also include notes to explain why the change occurred. Please see Tab "Instructions and TOC" for instructions on signing AOR.

Superintendent Approved Rating

**Marginal**

**Narrative** (explain reasoning for any changes made by the superintendent)

Superintendent's Signature **CRAIG ACKERMAN**  
 Digitally signed by CRAIG ACKERMAN  
 Date: 2020.05.08 12:47:26 -07'00'

Date

Concessioner Signature  
 (to signify receipt of rating)

**(b) (6)**

Date

8-14-2020

**Table 3: Evaluation Narratives**

Evaluation Narratives	
<p><b>Instructions:</b> Narrative assessment and comments on the Concession Annual Overall performance for the year are mandatory. Please use the outline below to organize the narratives. Enter "N/A" under outline headers which are not applicable.</p> <p>If you wish to attach a separate document to this Workbook as supporting materials, please see the instructions located on Tab "Instructions and TOC". Refer to any attachments in the space provided below. Please also use attachments if your text does not fit inside the boxes below.</p> <p><i>Hint: To start a new paragraph in the comments area, hold the ALT key and hit enter twice, then continue typing the next paragraph.</i></p>	
<b>CFIP / Construction / Repair and Maintenance Reserve or Rehab Projects</b>	Please see attached narrative.
<b>Leasehold Surrender Interest / Possessory Interest</b>	Please see attached narrative.
<b>Franchise Fees</b>	Please see attached narrative.
<b>AFR</b>	Please see attached narrative.
<b>Insurance</b>	Please see attached narrative.
<b>Risk Management</b>	Please see attached narrative.
<b>Environmental Management</b>	Please see attached narrative.
<b>Public Health</b>	Please see attached narrative.
<b>Asset Management</b>	Please see attached narrative.
<b>Administrative Compliance Reporting</b>	Please see attached narrative.
<b>Annual Visitor Use Statistics / Utilization Data</b>	Please see attached narrative.
<b>Problems / Issues and Resolution</b> (include outstanding problems/issues and intended resolution)	Please see attached narrative.
<b>Accomplishments or Outstanding Work</b>	Please see attached narrative.
<b>Future Plans for Concession Operation(s)</b>	Please see attached narrative.
<b>Visitor Satisfaction</b>	Please see attached narrative.
<p><b>Final Remarks:</b></p> <p>As outlined in this AOR, Crater Lake Hospitality was unable to establish an effective organization during this rating period and experienced significant failures across all aspects of their operations. Crater Lake staff remain concerned that some of these failures may be repeated or progress delayed in addressing outstanding issues due to an anticipated nearly complete turnover in staff. The staff at Crater Lake are committed remaining flexible and offering whatever support is necessary to ensure a successful concession operation. We hope that the new General Manager will be empowered to make the changes necessary to ensure quality services are provided and guest satisfaction improves. We also hope that progress can continue to be made in ensuring active and effective risk, environmental and facility management programs. We appreciate the open communication between NPS and CLH staff and hope continued dialog and this AOR will assist managers in prioritizing improvements to concessions operations across the property. We look forward to these improvements and the resulting successful performance reviews.</p>	

**United States Department of the Interior - National Park Service**  
**Form 10-ADM - Administrative Compliance Report**

<b>Park</b>	<u>Crater Lake National Park</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality, LLC</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2019</u>
<b>Contract Number</b>	<u>CRLA004-18</u>		

**Instructions:**  
For each element (row), use the drop-down or type in Column F (yellow) to specify if the element is either 1) in compliance ("Yes"), 2) not in compliance ("No"), or 3) not applicable ("N/A") for the concessioner under evaluation. If the element is either not in compliance or not applicable, use the "Remarks" box at the bottom of the form to provide an explanation.

**Notes:**  
- Elements marked with an asterisk (\*) represent "Special Attention Items." See comments at the bottom of the page for more information on how that affects scoring.  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.  
- For 8.B., use the concessioner's due date for their 2018 Annual Financial Report to complete the evaluation. If the 2018 AFR is not available or another year is used for any reason, please indicate the AFR year in the Remarks section below.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
1. Services and Operations	1.1*	All required services were provided by the Concessioner.	Yes	
	1.2*	All services provided by the Concessioner were authorized by the Contract.	Yes	
2. Concessioner Personnel	2.1	The Concessioner established and implemented policies and procedures for pre-employment screening, hiring, training, employment, review of employee conduct, and termination of employees in accordance with the Contract.	No	Employee conduct was a problem throughout the summer season. There was no supervision in Rim Dorm and on numerous occasions NPS staff documented CLH staff breaking their own employee conduct policies, particularly in regards to alcohol. During one contact with NPS Law Enforcement, CLH employees stated that they knew they could engage in inappropriate conduct and still not be terminated.
	2.2	The Concessioner was in compliance with Applicable Laws relating to employment and employment conditions including those in the Non-Discrimination Exhibit of the Contract.	Yes	
	2.3	The Concessioner developed and implemented appropriate training programs for employees in accordance with the Contract.	No	Training is conducted through employee orientations, on-the-job training and SAFE Briefs. Orientations were not conducted until the season was well underway. Employees did not know how to respond to basic visitor requests and did not always demonstrate positive customer service. This was documented through visitor complaints and observations by NPS concessions staff.
3. Legal, Regulatory and Policy Compliance	3.1	Has the concessioner received a violation(s) of any Applicable Laws? If no, move to Section 4.	No	
		i. Did the Concessioner inform the park superintendent?		
		ii. Did the Concessioner rectify the violation(s) in a timely manner?		
		iii. Was the violation resolved and closure documentation submitted to the park?		
4. Concession Facilities and Government Personal Property	4.1	The Concessioner operated only within the Assigned Land and Concession Facilities as identified in the Contract.	Yes	
	4.2	Government personal property assigned to the Concessioner was maintained in good and operable condition, and properly returned to the NPS for disposition if no longer serviceable.	Yes	The concessioner worked with the NPS to identify and remove unwanted government property.
5. Construction or Installation of Real Property Improvement	5.1	Any request for leasehold surrender interest was made in accordance with the requirements of the Contract.	N/A	
	5.2	Is there a Concession Facilities Improvement Program applicable to this rating period? If no, move to Section 6.	Yes	Rehabilitation of Rim Dormitory, Annie Creek Restaurant Improvements, Rim Village Cafe Building Improvements, Mazama Village Camper Store Improvements
	5.3	The Concessioner submitted plans and specifications for approval by the Superintendent.	No	Has not yet submitted any specific plans to NPS for the following projects: Rehabilitation of Rim Dormitory, Annie Creek Restaurant Improvements, Mazama Village Camper Store Improvements. Only partial planning and work has been completed towards the Rim Village Cafe Building Improvement project, as identified in the contract.

	5.4	The Concessioner started the project on time.	No	All CFIP projects had an estimated start date of April 2019. Only the Rim Village Café Building Improvement project has had any work completed in 2019. No design plans were submitted or work begun for the remaining projects in 2019.
	5.5	The Concessioner completed the project on time.	N/A	No CFIP projects have completion dates in 2019.
	5.6	The Concessioner submitted documentation to confirm that expenditures of the program were in accordance with the Contract.	N/A	
<b>6. Tracking and Payment of Required Fees</b>	6.1*	If a maintenance expense is required, the Concessioner expended the minimum amount required by the Contract during this rating period.	N/A	
	6.2*	The Repair and Maintenance Reserve was spent correctly.	N/A	No RMR spending in 2019
	6.3*	The Concessioner submitted all required franchise fees and required reports on time, including the monthly franchise fee report.	Yes	CLH submitted Franchise Fee Reconciliation reports within the first week of each month. In several months there were delays in issuing the Bill of Collection (NPS) or in making payment after receiving the BOC (CLH), but payments were always made in full and within a reasonable amount of time.
	6.4	If applicable, interest assessed on overdue franchise fee amounts was paid.	N/A	
	6.5	Handicraft sales claimed as exempt from franchise fees were supported by appropriate documentation, e.g. invoices bearing a certification by the supplier that the items were Authentic Native Handicrafts.	Yes	CLH inaccurately reported handicraft exemptions in several months due to the timing of their monthly accounting cycle. However, they worked to reconcile inaccurate exemptions in the next month and reporting improved throughout the year.

7. Indemnification and Insurance	7.1*	The Concessioner provided the superintendent with a current Certificate(s) of Insurance.	No	CLH submitted COIs at the beginning of the contract. Although the policy was renewed in June, CLH did not send updated COIs until the NPS requested them in December, when they were promptly provided.
	7.2*	The Certificate(s) of Insurance documented that the Concessioner was compliant with all insurance coverages required in the Contract. This compliance may be determined through a review by a third party consultant.	N/A	Updated COIs sent to Northpointe for compliance review. Documentation provided was insufficient to determine compliance. Additional information has been requested and review is ongoing.
8. Accounting Records and Reports	8.1	If this is the first year of a Contract, the opening balance sheet was submitted as required by the Contract.	Yes	
	8.2*	The Concessioner submitted the Annual Financial Report (AFR) due within this rating period.	N/A	As this was the first year of the contract, no AFR was due within this rating period.
	8.3*	The Concessioner submitted the AFR on time.	N/A	2019 AFR submitted January 24, 2020, less than 120 days after the end of the concessioner's fiscal year. This will be accounted for in the 2020 rating period.
	8.4*	The AFR was audited by an independent licensed or certified public accountant, if required.	N/A	Yes, and will be accounted for in the 2020 rating period.
9. Other Reporting Requirements	9.1	The superintendent may require the Concessioner to submit reports and data regarding its performance under the Contract. Some common reporting requirements are listed below.		
		i. Visitor Use Statistics/Operating Reports	Yes	
		ii. Customer Comment Reports	Yes	
		iii. Hours of Operation	Yes	
		iv. Management Listing	Yes	
		v. Inventory of Waste Streams	No	Although required by the contract, an Inventory of Waste Streams was not submitted.
		vi. Employee Handbook	Yes	
vii. <i>Any additional pertinent reports</i>				
10. Assignment, Sale or Encumbrance of Interests	10.1	If the concession was sold or transferred during this rating period, the Concessioner fulfilled all obligations stipulated by the Contract.	N/A	
	10.2	If the name of the business has changed in the past year, give new name below:		
11. Sub-concessions	11.1	If there were any agreements with third parties to provide services authorized or required in the Contract, list the services they provided below:		
	11.2*	All sub-concessions were approved by the superintendent.	N/A	
12. Utilities	12.1	List utility services provided by the NPS for the Concessioner (If there are no utilities provided by the NPS, enter N/A):	water, wastewater, fuel	
	12.2*	The Concessioner paid for the utility services provided in a timely manner.	No	Of the 7 bills sent for utility services, 4 were paid outside of the 30-day payment window. The first round of bills was paid over a month late.
	12.3*	If a utility add-on was approved, the Concessioner submitted all required reports, including the distribution of add-ons and reconciliation reports.	N/A	
13. Advertising and Promotional Materials	13.1	The Concessioner obtained NPS approval for all promotional material prior to publication or distribution.	Yes	
	13.2	If the Concessioner used the Concessioner Mark, the Concessioner obtained approval prior to using the Mark and followed the guidelines for using the Mark.	Yes	
	13.3	The Concessioner's websites and social media sites contained accurate and relevant information.	Yes	CLH generally made several NPS-requested changes to the website to accurately reflect operations. Errors continue to be reported, but are corrected immediately upon reporting to CLH staff.
14. Contract Transition	14.1	If the Contract was in transition, the Concessioner managed operations appropriately to achieve an orderly transition of operations and avoided disruption of services, including adhering to the provisions stipulated in Exhibit J "Transition to a New Concessioner."	N/A	



15. Other Requirements	15.1	The Concessioner was in compliance with all terms of the contract, not otherwise addressed in the administrative compliance, service or program-specific reviews.	No	The contract lists specific requirements for concessioner personnel that were not fully met, including providing sufficient personnel to provide services required, enforcing drug-free housing policies, ensuring employees were wearing appropriate uniforms and name badges, etc. Key positions, including General Manager, Maintenance Manager, and other departmental managers are to be filled within 60 days. GM, Maintenance, HR, Retail, and F&B Manager positions were all vacant for several months at different times. CLH struggled to maintain reservation systems as outlined in the contract. Only one on-site employee was trained on their computerized system. The campground reservation system would not allow visitors to choose specific sites, and in some instances Senior discounts were not honored. Boat tours were regularly overlooked. Lost and Found was not managed appropriately; Credit cards kept in desks for months without notification to NPS.
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<b>ADDITIONAL NOTES / COMMENTS</b>
Please see attached narrative.

Table 2: Scoring

Scoring					
Program Area	Score (%)	Program Area	Score (%)		
1. Services and Operations	100.0%	9. Other Reporting Requirements	83.3%		
2. Concessioner Personnel	33.3%	10. Assignment, Sale or Encumbrance of Interests	n/a		
3. Legal, Regulatory and Policy Compliance	n/a	11. Special Provisions – Sub-concessions	n/a		
4. Concession Facilities and Government Personal Property	100.0%	12. Special Provisions – Utilities	0.0%		
5. Construction or Installation of Real Property Improvement	0.0%	13. Advertising and Promotional Materials	100 0%		
6. Tracking and Payment of Required Fees	100.0%	14. Contract Transition	n/a		
7. Indemnification and Insurance	0.0%	15. Other Requirements	0.0%		
8. Accounting Records and Reports	100.0%				
<b>Total - All Program Areas</b>					
# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Item)	# N/A	# Applicable Requirements	
16	8	2	17	24	
<b>Administrative Compliance Score</b>		<b>66.7</b>		Superior = 90 – 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = ≤49	
<b>Adjusted Administrative Compliance Score</b>		<b>66.7</b>			
<b>Rating</b>		<b>Marginal</b>			
<p><i>Notes:</i>  1) If 1-2 Special Attention Items are not in compliance, the Administrative Compliance Score is adjusted to Marginal and capped at 69.  2) If 3+ Special Attention Items are not in compliance, the Administrative Compliance Score is adjusted to Unsatisfactory and capped at 49.</p>					

**United States Department of the Interior - National Park Service**  
**Form 10-OPR - Concession Operational Performance Report**

<b>Park</b>	<u>Crater Lake National Park</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality, LLC</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2019</u>
<b>Contract Number</b>	<u>CRLA004-18</u>		

**Instructions**  
Fill in the (yellow) highlighted cells in the table below with the following information:  
**Location** – List the concession location/facility being evaluated. (Note **Location MUST be filled out in order to activate the scoring on this form.**)  
**Service Type** - List the service type being evaluated (Note: If a single location/facility has multiple service types, the facility should receive multiple rows in the table, one for each service type).  
**Weighting** - Add a weighting value based on the importance of the service to the park: 1 = low importance, 2 = medium importance, or 3 = high importance. (Note **Weighting MUST be filled out in order for the form to work properly. If the user wishes to have all locations/services have equal weights, simply select the same weighting for each.**)  
**Periodic Evaluation (PE) Score(s)** – For each location/service type, enter the score (1-5) the concessioner achieved in PEs performed during the evaluation year. (Note: If multiple PEs were performed during the year, enter them in columns F, G and H).  
  
If you require more than the 20 rows in Table 1, click the "+" button on the left side of this worksheet (near row 141) to add additional rows.  
If you require more than 120 rows in Table 1, please contact [cs\\_cm\\_helpdesk@nps.gov](mailto:cs_cm_helpdesk@nps.gov) for a new version of the AOR Workbook.  
If you have completed more than four PE's during a given year, please contact [cs\\_cm\\_helpdesk@nps.gov](mailto:cs_cm_helpdesk@nps.gov) for a revised 10-OPR form with additional columns.  
  
**Notes:**  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

<b>If no periodic evaluations were completed for this Contract during this rating period, enter "X" in the box on the right.</b>	
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**Note** If no periodic evaluations were completed, please explain why in the "Comments" box below.

**Table 1 Facility Evaluation**

**Hints:**  
- To delete unnecessary/extra rows from the table below, select the desired rows to delete and hold **Ctrl + Shift + D** on your keyboard.  
- DO NOT insert individual rows into the table below.

Location / Facility	Service Type	Weighting	Periodic Evaluation Score(s)					Weighted Score
			PE #1	PE #2 (if app)	PE #3 (if app)	PE #4 (if app)	Average PE Score	
Annie Creek Gift Shop	Retail	2 - Medium	3	3			3.0	6.0
Annie Creek Restaurant - Facility	Food and Beverage – Fast Casual Dining	3 - High	4	3			3.5	10.5
Annie Creek Restaurant - Dining	Food and Beverage – Fast Casual Dining	3 - High	5				5.0	15.0
Mazama Cabins	Lodging – Basic	3 - High	3	3			3.0	9.0
Mazama Camper Store	Retail	2 - Medium	3	3			3.0	6.0
Mazama Laundry & Showers	Showers	3 - High	4	4			4.0	12.0
Mazama Service Station	Automobile Services	2 - Medium	4	5			4.5	9.0
Mazama Campground	Campgrounds	3 - High	3				3.0	9.0
Mazama Dorms & Warehouse	Employee Housing	2 - Medium	3	3			3.0	6.0
Crater Lake Lodge	Lodging – Midscale	3 - High	3	3			3.0	9.0
Lodge Restaurant - Facility	Food and Beverage – Upscale Casual Dining	3 - High	2	2	3		2.3	7.0
Lodge Restaurant - Dining	Food and Beverage – Upscale Casual Dining	3 - High	4				4.0	12.0
Lodge EDR	Employee Dining Rooms	2 - Medium	3	4			3.5	7.0
Rim Dorm	Employee Housing	2 - Medium	3	4			3.5	7.0
Rim Café	Food and Beverage – Quick Service	3 - High	3	2			2.5	7.5
Rim Gift Shop	Retail	2 - Medium	4	4			4.0	8.0
Volcano Boat Tours	Water – Guided Tours	3 - High	3				3.0	9.0
Snowshoe Rentals	Rentals – Recreational Equipment	2 - Medium	4				4.0	8.0

**Use the space below to justify/explain the weighting system adopted in the table above.**

The park weighted services such as food, accommodations, or interpretation for visitors as the highest priority. Medium weight services were those that the park deemed as less important to the basic needs of visitors or to their ability to connect with the park. The park also rated employee amenity services, such as housing and dining, as medium weight. There are no low weight services, as all services contribute directly towards the visitor experience or employee satisfaction in the park.

**Table 2 Scoring**

**Scoring**

**OPTIONAL** - If you would like to see the operational performance broken by service type, insert all service types evaluated at the concessioner below in the highlighted cells (from 2nd column in table above - only list each service type once)

Service Type	Average Weighted Score
Automobile Services	4.5
Campgrounds	3.0
Employee Dining Rooms	3.5
Employee Housing	3.3
Food and Beverage – Fast Casual Dining	4.3
Food and Beverage – Quick Service	2.5
Food and Beverage – Upscale Casual Dining	3.2
Lodging – Basic	3.0
Lodging – Midscale	3.0
Retail	3.3
Water – Guided Tours	3.0

Operational Performance  
Score  
  
Rating

<b>68.3</b>
<b>Marginal</b>

Superior = 90 – 100  
Satisfactory = 70 – 89  
Marginal = 50 – 69  
Unsatisfactory = ≤49

**ADDITIONAL NOTES / COMMENTS**

Please see attached narrative.

**United States Department of the Interior - National Park Service**  
**Form 10-PHP - Public Health Program Evaluation Report**

<b>Park</b>	<u>Crater Lake National Park</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality, LLC</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2019</u>
<b>Contract Number</b>	<u>CRLA004-18</u>		

**Instructions:**  
 Facility Information: All facilities may not be inspected during the course of the year, however, it will be important to provide documentation on the facility information section to maintain accurate records. Food service operation types include restaurants/cafeterias, snack bars, grocery, pre-packaged, backcountry, vending, temporary, mobile, and other.

Inspection Information – Transfer the number of Satisfactory, Marginal, and Unsatisfactory (S, M, U) ratings from the Food Service Sanitation Inspection Report to this section. Calculations for the final score will automatically be made if using the form electronically. Just enter the number of Satisfactory inspections, number of Marginal Inspections, and number of Unsatisfactory Inspections. If the form is being completed manually, multiply the number of inspections in each category (S, M, U) by the following points: Satisfactory = 100, Marginal = 50, Unsatisfactory = 0. Total the number of inspections and the number of points and then, divide the total number of points by the total number of inspections for the final score.

*Notes:*  
 - For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
 - To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Facility Information**

FACILITY INFORMATION			
Facility Type	Number of Facilities	Facility Name(s)	Comments / Notes / Remarks
Restaurants/Cafeteria	3	Lodge EDR, Lodge Restaurant, Annie Creek Restaurant	
Snack Bars	1	Rim Café	
Grocery	1	Mazama Camper Store	
Pre-Packaged			
Bar			
Backcountry			
Temporary (Identify)			
Vending			
Mobile			
Other1	1	Warehouse	
Other2			
<b>Total Number of Facilities</b>	<b>6</b>		

ADDITIONAL NOTES / COMMENTS
Please see attached narrative.

**Table 2: Inspection Information**

INSPECTION INFORMATION		
<b>Instructions:</b> Fill in the yellow cells below with the number of Public Health inspections that achieved the corresponding rating (e.g. for the first box, enter the number of inspections where the concessioner achieved a "Satisfactory" rating).		
	# Inspections	Points
<b># Satisfactory</b>	11	1100
<b># Marginal</b>		
<b># Unsatisfactory</b>	1	0
<b>Total</b>	12	1100

<b>Public Health Score</b>	<b>91.7</b>	Satisfactory = 85 – 100* Marginal = 50 – 84 Unsatisfactory = ≤ 49
<b>Adjusted Public Health Score</b>	<b>84.0</b>	
<b>Rating</b>	<b>Marginal</b>	

*Note: If concessioner received one or more Unsatisfactory inspections, the final public health rating cannot exceed Marginal and the score cannot exceed 84.*

**United States Department of the Interior - National Park Service**  
**Form 10-RMP - Risk Management Program Evaluation Report**

<b>Park:</b> <u>Crater Lake National Park</u> <b>Concessioner Name:</b> <u>Aramark</u> <b>Contract Number:</b> <u>CRLA004-18</u>	<b>Concessioner DBA:</b> <u>Crater Lake Hospitality, LLC</u> <b>Year of Operation:</b> <u>2019</u>
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**Instructions:**  
The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

*Notes:*  
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- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Program Area Evaluations**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Risk Management Program (RMP) Scope</b>	1.1	The RMP is documented, and its scope covers the ten risk management elements. Furthermore, the RMP scope addresses the risk management objectives and aspects applicable to the operation, including: <ul style="list-style-type: none"> <li>• legal requirements (Applicable Laws), contract requirements (including requirements contained in Exhibits), and safety best management practices</li> <li>• employee and visitor hazards</li> <li>• operational, facility and natural hazards</li> </ul>	No	The RMP is documented and it does cover the ten risk management elements. However, the RMP does not fully reflect the operations at Crater Lake, as specific location and operational hazards are not identified or referenced. In several instances, the operations or authorities identified do not actually apply to Crater Lake (busses, security screening, State of Arizona, etc). It appears that the RMP was copied from another Aramark property with few changes made to actually address the CRLA operations.
	1.2	The RMP establishes a safety policy for the organization. The policy indicates commitment to: <ul style="list-style-type: none"> <li>• compliance with Applicable Laws</li> <li>• providing a safe and healthful environment for employees, park staff and visitors to the extent possible</li> <li>• assigning responsibilities</li> <li>• providing staff and resources</li> <li>• monitoring performance</li> </ul>	Yes	The RMP establishes a strong safety policy for the organization through the use of established emergency action plans, observation, investigation, and reporting standards, training standards, etc. It is unclear how much of this was applied at CRLA this season, but the structure seems to be in place.
<b>2. Responsibility and Accountability</b>	2.1	The concessioner identifies a safety and health official, and documents this assignment in the RMP.	Yes	The GM is the identified safety and health official. However, during the course of the year there were three different GMs and one remote acting GM. With the turnover and other priorities, it does not appear that any of the GMs were actively managing the Risk Management Program.
	2.2	The concessioner identifies the risk management organizational and staff responsibilities, and documents this structure and assignments in the RMP.	No	The RMP outlines basic responsibilities for the safety and health official (GM) and organizational employees. The appendices outline responsibilities in relation to specific procedures (hazard reporting, safety briefings, etc.), but these appendices are provided from the corporate level and there is no evidence that these procedures were implemented on-site at Crater Lake. Roles established in the submitted RMP have not been assigned, including the Safety Officer, Hazard Communication Program Administrator, etc.
	2.3	RMP resources are developed, documented in the RMP, and applied; resources are adequate to execute the program. Resources include: <ul style="list-style-type: none"> <li>• personnel (e.g., number of staff, experience and skills)</li> <li>• facilities and equipment</li> <li>• information, documentation, and data management systems</li> <li>• agreements for support from outside contractors and agencies</li> <li>• training programs for concession personnel</li> </ul>	No	Resources have been developed at a corporate level including emergency action plans, online training plans, SAFE briefings, etc. However, there is little indication that these plans have been followed-up on or further developed to apply on-site. For example, the RMP describes the use of a Risk Management Log to be used to identify and address risks, but this was never developed. CLH struggled to secure and maintain agreements with outside contractors, particularly to work on fire alarm systems, which went unrepaired for several

3. Training	3.1	Managers and staff with safety and health responsibilities meet the qualification requirements defined in the contract and RMP. Competency requirements are defined by appropriate education, training, and experience.	No	There were three different GMs and one Acting GM throughout the course of 2019. Although any of these GMs may have been capable of managing and carrying out the RMP, with the constant turnover and need to address other pressing issues, none of the GMs seemed to be up to speed on the contract requirements or actions outlined in the submitted RMP. Additionally, several staff with safety and health responsibilities did not meet basic qualifications. Although CLH maintains several USTs and a fuel service station, nobody held the required Oregon Class A/B UST Vendor/Operator training certification and retail staff had not been trained on basic fuel station procedures. For at least several weeks in the fall after the departure of the chef and retail manager, there were no on-site staff who had completed <del>ServeSafe training requirements</del> .
	3.2	A training plan is developed, documented in the RMP, and executed; and includes: <ul style="list-style-type: none"> <li>• Defined training requirements for the safety officer and other personnel, including requirements to meet Applicable Laws, the contract, and the RMP.</li> <li>• Required training records, such as training materials, schedules, and participant records.</li> </ul>	No	The RMP lists several broad training categories for all staff, but does not indicate any operation-specific training requirements. Management has indicated that training is assigned at the corporate level and completed online, so there are no physical records or ways for managers to know exactly what training each employee has received. This is in contradiction to what is described in the RMP.
	3.3	The concessioner has conducted and documented all training.	No	The concessioner incorporates basic risk awareness training into their orientation program and on-the-job training. However, orientation programs were not conducted until midway through the summer season. Weekly SAFE briefs are used to reinforce training topics, but there is no record of who has participated. Additional training is assigned at the corporate level and completed online. However, on-site management does not seem to have a way of tracking what training has been assigned or completed. This is in contradiction to what is described in the RMP. The boat plan lists a 40 hour training requirement for all boat staff, but training records were never provided and there is no evidence that this was completed.

4. Documentation and Operational Controls	4.1	RMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws, the contract, and the RMP to ensure safe operations. Some plans and procedures may overlap with those in the EMP. Examples of operating procedures include: <ul style="list-style-type: none"> <li>• procedures for the safe storage and handling of chemicals</li> <li>• procedures for embarking and disembarking visitors</li> <li>• procedures for safe equipment use</li> <li>• procedures for managing wildlife interactions</li> <li>• procedures for cancelling operations due to weather</li> </ul>	No	The RMP references several SOPs that are to be developed and kept on-site, but management was unable to provide evidence of these SOPs. The NPS has provided a detailed boat operations plan, but plans were not made available and a majority of captains were unaware they existed. There were no SOPs associated with operation of USTs or fueling operations (nor was this referenced in the RMP) and the Mazama fuel station was closed by the NPS until proper SOPs could be implemented. The NPS found several unmarked cleaning chemicals stored in various facilities and at one point during the summer it became known that housekeeping staff were using an industrial strength hood degreaser chemical to clean the floors.
	4.2	RMP emergency plans and procedures are developed, documented (if applicable), implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws, the contract, and the RMP. Some plans and procedures may overlap with those in the EMP. Emergencies to be addressed include: <ul style="list-style-type: none"> <li>• natural disasters (earthquakes, floods, tornados, hurricanes, etc.)</li> <li>• motor vehicle incidents</li> <li>• medical emergencies (visitors and employees)</li> <li>• fire (structural, motor vehicles, wildfires, etc.)</li> <li>• terrorism and law enforcement activities</li> <li>• accidents and fatalities (visitors and employees within park boundaries)</li> </ul>	No	A detailed Emergency Action and Emergency Response Plan was submitted with the RMP. However, it is unclear if staff have been trained on emergency plans and procedures or their role in an emergency. In several instances, established plans were not followed. In at least two instances, employees did nothing to respond to fire alarms at the Lodge, despite the Lodge being fully occupied by guests. Other times, unauthorized employees silenced and cleared alarms prior to the arrival of responders, hindering investigation into the alarm. Several motor vehicle accidents occurred on the property that were not reported to the NPS. The RMP includes a Spill Response Plan, but there is no evidence that the plan has been implemented on-site, as NPS evaluators found outdated spill response procedures from the previous concessioner left in place around the property at employee information points.
5. Communications	5.1	The RMP is available to staff and communicated throughout the concession organization so that personnel understand and can effectively implement the RMP.	No	Although CLH has implemented several elements of risk management awareness including orientation training and SAFE Briefs, SAFE Observations, and required OSHA postings, there does not seem to be any efforts made to implement the Risk Management Program as described in the submitted Risk Management Plan. Managers did not seem to have knowledge of what was included in the document itself. Listed roles were not assigned and there is no evidence that staff were trained on the RMP or associated Emergency Action Plan, as several incidents were improperly reported or responded to.
	5.2	The RMP addresses procedures for communicating hazards to visitors. The hazards may include: <ul style="list-style-type: none"> <li>• Activity-related hazards (e.g., white water rafting)</li> <li>• Natural resource-related hazards (e.g., bears)</li> </ul>	Yes	Visitors receive basic information when checking in for lodging, camping, renting snowshoes, and embarking on boat tours. Evacuation maps are posted in all facilities and lodging rooms.
	5.3	Any visitor acknowledgment of risk is approved by the park. Waivers of liability are not used.	No	Snowshoe rental includes a VAR. It was not submitted to the park for review. During Periodic Evaluation, inspector found that VAR used the appropriate language, but made reference to activities that CLH does not rent equipment for such as skiing and snowboarding.
	5.4	The concessioner's risk emergency plans are coordinated and agreements in place with other applicable parties such as the NPS, other federal, state, or local emergency response agencies.	No	Appendix A of the Emergency Action Plan states that the NPS has a comprehensive Facility Response Plan, but it does not. CLH did not coordinate with their fire alarm monitoring company to ensure proper notification in the event of an alarm. Some of the damage to the Lodge kitchen and basement may have been avoided if they had been notified and able to respond promptly when the system activated. In numerous instances, the alarm monitoring company did not get notification of alarms because the phone lines were not working. Sometimes CLH employees called alarm activations into the park backcountry office rather than 911.
	6.1*	All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided to the NPS in accordance with the contract. Additional plans, reports, and other documentation are submitted to the NPS in accordance with the contract and RMP.	No	Several items required to be submitted prior to start of boat tour operations were submitted late including USCG vessel inspections and captain certifications. Captain's training records were never submitted, although they were requested on several occasions and required by the CRLA Boat Plan. On at least two separate occasions the ORDEQ contacted the NPS to request documents related to concessioner-operated USTs, as they had not been submitted.

<b>6. Reporting</b>	6.2*	Imminent danger and serious incidents are reported to the park in a timely manner in accordance with the contract and RMP.	No	Boat Tour Incident Reports were not submitted in a timely manner, or not submitted at all. At least four vehicle accidents were not properly reported to NPS, three of which involved CLH vehicles. Recurring problems with fire alarms were not reported to the NPS or corrected in a timely
	6.3	Annual reports include internal, park, and other regulatory agency risk data, and are submitted to the NPS in accordance with the contract and RMP.	Yes	There are no defined annual reporting requirements related to the risk management program in the contract. Vessel inspection reports were submitted as outlined in 6.1.
<b>7. Inspections and Corrective Action</b>	7.1	Safety inspections are conducted as specified in the contract and RMP or as otherwise necessary to effectively manage operations safely. Formal and routine inspections are scheduled, conducted, and documented. The inspections are conducted by qualified personnel as described in the RMP.	Yes	Required building and vessel inspections were completed prior to facility openings and reports were provided to the NPS. However, not all vessel inspection certifications were provided to the NPS. CLH reports that SAFE Observations were completed by staff and submitted one as an example, but does not seem to have a record of all that were completed throughout the year.
	7.2*	Imminent danger, serious, and non-serious hazard deficiencies identified by internal or external inspections are analyzed, corrected, or mitigated within the contract or RMP required timeframes. Any deviations from these timeframes are accepted by the park and documented.	No	Fire alarms in several buildings were not functioning properly for extended periods of time, resulting in extended fire watches in a concession housing facility and the closure of Rim Café for several months. The NPS identified a number of other issues related to fire detection and alarm systems that had not been addressed by the concessioner including non-functioning emergency egress lights, taped over smoke detectors, unidentified nuisance alarms, blocked exits, extinguishers, pull stations, etc.
<b>8. Hazard Incident Investigations and Abatement</b>	8.1*	Accidents/incidents are responded to in a timely and effective manner.	Yes	Other than the incidents already addressed in 6.2, there were no significant accidents/incidents that required response.
	8.2	An investigation is conducted for every accident/incident. <ul style="list-style-type: none"> <li>The investigation includes an analysis to determine the cause.</li> <li>Corrective action is taken to mitigate recurrences of the accident/incident.</li> </ul>	Yes	Aramark has SAFE Investigation standards to be used after an accident or incident. It is unclear whether or not this was used to investigate the incidents that did occur. All incidents that the NPS was made aware of were discussed with the concessioner to ensure follow up and corrective action.
<b>9. Management Review</b>	9.1*	The RMP is reviewed at least annually, and updated as necessary. <ul style="list-style-type: none"> <li>The RMP review includes analysis of performance in each RMP element area to determine any systemic program failures (particularly failures that resulted in fatal or serious accidents/incidents or imminent danger hazard deficiencies) and non-compliance with Applicable Laws.</li> <li>Systemic problems are addressed in RMP updates.</li> </ul>	N/A	This was the first year of the contract. The initial RMP was submitted June 18th. There have been no updates since then.
	9.2	The initial RMP is submitted to the park within the contract specified timeframe for review, and is accepted by the park. Any subsequent documented RMP updates are submitted to the park for review and acceptance.	No	The initial RMP was due March 1, 2019. It was submitted June 18, 2019, over 100 days after the due date.
<b>10. Other Contract Requirements</b>	10.1	Contract-specific safety and health requirements not otherwise addressed in the RMP standards are met.	No	There are a number of specific requirements related to structural fire protection, including complying with all applicable laws and codes, developing a Fire Prevention Plan, registering for the Federal fire-safe list, etc.

\*Special Attention Item

**ADDITIONAL NOTES / COMMENTS**

Please see attached narrative.



**Table 2: Scoring**

Scoring			
Program Area	Score (%)	Program Area	Score (%)
1. Risk Management Program (RMP) Scope	50.0%	7. Inspections and Corrective Action	50.0%
2. Responsibility and Accountability	33.3%	8. Hazard Incident Investigations and Abatement	100.0%
3. Training	0.0%	9. Management Review	0.0%
4. Documentation and Operational Controls	0.0%	10. Other Contract Requirements	0.0%
5. Communications	25.0%		
6. Reporting	33.3%		

**Total - All Program Areas**

# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Item)	# N/A	# Applicable Reqs.
7	16	3	1	23

<b>Risk Management Score</b>	<b>30.4</b>	Superior = 90 – 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = ≤49
<b>Adjusted Risk Management Score</b>	<b>30.4</b>	
<b>Rating</b>	<b>Unsatisfactory</b>	

**Notes:**

- If 1-2 Special Attention Items are not in compliance, the Risk Management Score is adjusted to Marginal and capped at 69.
- If 3+ Special Attention Items are not in compliance, the Risk Management Score is adjusted to Unsatisfactory and capped at 49.

**United States Department of the Interior - National Park Service**  
**Form 10-EMP - Environmental Management Program Evaluation Report**

<b>Park</b>	Crater Lake National Park	<b>Concessioner DBA</b>	Crater Lake Hospitality, LLC
<b>Concessioner Name</b>	Aramark	<b>Year of Operation</b>	2019
<b>Contract Number</b>	CRLA004-18		

**Instructions:**  
The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

**Notes:**  
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**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Environmental Management Program (EMP) Scope</b>	1.1	The concessioner's EMP scope (whether documented or undocumented) covers the environmental objectives and environmental management aspects applicable to the operation including: <ul style="list-style-type: none"> <li>• legal requirements (Applicable Laws), contract requirements (including requirements contained in Exhibits), and environmental best management practices</li> <li>• facilities and operations</li> <li>• natural and cultural resources</li> </ul>	Yes	Aramark submitted their Environmental Management Program Plan on June 18, 2019. The EMPP makes reference to the contractually required elements (Policy, Goals and Targets, Responsibilities and Accountability, Documentation, Documentation Control and Information Management System, Reporting, Communication, Training, Monitoring, Measurement, and Corrective Action) but does not account for all activities with potential environmental impacts, nor were specifics provided at any point throughout the year. References are made to meeting legal requirements, contract requirements, and environmental BMPs, but no specific plans or strategies are outlined or were submitted to the park. The plan provides guidance for how an Environmental Management Program should be developed and enacted. Although the plan has not been followed through on, the framework seems to be in place.
	1.2**	The EMP is documented.	Yes	Although none of the action items or strategies for achieving environmental objectives have been implemented on site, Aramark has documented an Environmental Management Program Plan, which provides an outline for how an Environmental Management Program should look.
	1.3**	The EMP establishes the concessioner's environmental policy. The policy indicates commitment to: <ul style="list-style-type: none"> <li>• compliance with Applicable Laws</li> <li>• protecting and conserving park resources and human health</li> <li>• assigning responsibilities</li> <li>• providing staff and resources</li> <li>• monitoring performance</li> </ul>	Yes	The EMPP states that Aramark will develop an Environmental Policy that will be signed by the general manager and will serve as the foundation for all environmental activities. No official policy has been articulated, but the EMPP does describe how the concessioner should assign responsibilities, comply with Applicable Laws, monitor performance, etc. None of these actions are documented to have taken place on site, but the framework seems to be in place.
<b>2. Responsibility and Accountability</b>	2.1**	The concessioner must identify an environmental officer and/or program manager and document this assignment in the EMP. The environmental officer must meet the contract specified qualifications and requirements defined in the documented EMP.	No	The EMPP lists a number of roles and responsibilities but none of the roles or responsibilities were actually assigned to individuals in 2019. No specific qualifications are noted in the EMP other than general references to legal and other requirements.
	2.2	The concessioner determines management and staff responsibilities as necessary to effectively manage environmental activities, and describes this structure and these assignments in the documented EMP (if applicable).	No	The EMPP lists a number of roles and responsibilities for members of the Environmental Management System Team, but these roles have not actually been assigned. The EMPP does not reference the role of general staff or contractors.
	2.3	EMP resources are developed, documented in the EMP (if applicable), and applied; resources are adequate to execute the program. Resources include: <ul style="list-style-type: none"> <li>• personnel (e.g., number of staff, experience and skills)</li> <li>• facilities and equipment</li> <li>• information, documentation, and data management systems</li> <li>• agreements for support from outside contractors and agencies</li> <li>• training programs for concession personnel</li> </ul>	No	EMP resources were not developed or applied. On-site personnel did not seem to be aware of the Environmental Management System requirements or objectives. No data was collected in support of the EMP or its objectives. There is no evidence that training was conducted with staff other than what was required by the NPS to operate the Mazama fuel station.
<b>3. Training</b>	3.1	Managers and staff with environmental management responsibilities meet qualification requirements defined in the contract and documented EMP (if applicable). Competency requirements are defined by appropriate education, training, and experience.	No	No on-site staff were formally assigned environmental management responsibilities and it did not appear that anyone on staff had experience implementing an Environmental Management Plan. Although the concessioner operates several USTs and a public fuel station, nobody on staff had spill response training. The NPS had to close the Mazama fuel station down for several weeks due to a lack of training, SOPs, and required equipment.
	3.2	A training plan is developed, documented in the EMP (if applicable), and executed; and includes: <ul style="list-style-type: none"> <li>• Defined training requirements for the environmental officer and other personnel, including requirements to meet Applicable Laws, the contract, and the EMP.</li> <li>• Required training records, such as training materials, schedules, and participant records.</li> </ul>	No	The EMPP references a Staffing Plan which will outline specific training requirements for each position and a variety of training formats that will be used, but there is no evidence that this plan exists or that training in environmental management has occurred.

	3.3	The concessioner has conducted and documented all training.	No	There is no evidence that training on environmental management principles was conducted.
4. Documentation and Operational Controls	4.1	EMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the documented EMP (if applicable). These procedures address requirements in Applicable Laws, the contract, and the EMP to ensure protection of human health and the environment. Some plans and procedures may overlap with those in the RMP. Examples of operating procedures include: <ul style="list-style-type: none"> <li>• procedures for the storage and handling of chemicals</li> <li>• procedures for the management and maintenance of fuel</li> <li>• procedures for pesticide use</li> <li>• procedures for hazardous and solid waste disposal</li> <li>• procedures for weed and pest management</li> <li>• procedures for the protection of cultural and archeological resources</li> </ul>	No	No SOPs were submitted with the EAP. The Emergency Action Plan/Emergency Response Plan includes SOPs for Spill Response and Hazard Communication, but it did not appear that those SOPs were being implemented. Cleaning chemicals in unmarked containers were found during periodic evaluations. At one point concession staff were using undiluted kitchen hood degreaser to clean the floors, potentially causing sudsing in the NPS wastewater ponds and impacting the system's operation. No pest management plan was submitted, including a list of requested pesticides, yet the concessioner hired a pest management company and deployed non-compliant bait stations without notification. An SOP was developed for the Mazama fuel station after the NPS closed it due to lack of planning, training, and required equipment. However, the SOP developed was not being followed, as NPS staff discovered during an inspection that tank
	4.2	EMP emergency plans and procedures for environmental management are developed, documented (if applicable), implemented, maintained, and included or referenced in the documented EMP (if applicable). These plans and procedures address requirements in Applicable Laws, the contract, and the EMP. Some plans and procedures may overlap with those in the RMP. Emergencies to be addressed include: <ul style="list-style-type: none"> <li>• hazardous substance spill response</li> <li>• leaks from fuel storage tanks or other chemical storage areas</li> <li>• storm water contamination</li> </ul>	No	The Emergency Action Plan includes procedures for spill response and chemical storage. However, it does not appear that the procedures have been implemented on site. Procedures and contacts listed near fuel tanks had not been updated from what was left by the previous concessioner. The EAP also lists a Spill Prevention, Control, and Countermeasure Plan and UST Facility Response Procedures, but these were not provided.
5. Communications	5.1	The EMP is available to staff (if applicable), and communicated throughout the concession organization so that personnel understand and can effectively implement the EMP.	No	The EMPP was not submitted until mid-June, once most staff had already started working. There did not seem to be any awareness among staff that an Environmental Management Plan was in place and how to implement it on-site. No goals or targets were established for 2019 that would have been communicated to staff.
	5.2	The EMP addresses procedures for communicating environmental controls and initiatives to visitors. These may include: <ul style="list-style-type: none"> <li>• Handling hazardous materials (e.g., fuel)</li> <li>• Handling waste (e.g., trash)</li> <li>• Natural resource or cultural resource impacts</li> <li>• Pest management (e.g., notification of pests if observed)</li> </ul>	Yes	The EMP describes how the Communication Specialist is responsible for ensuring information is shared with external stakeholders. There is no Communication Specialist, but some information has been shared with lodging visitors through the use of registration cards (wildlife encounters) and room placards (water conservation). The CLH website also lists several sustainability initiatives that are described in the contract, but many of these have not been implemented yet. We expect to see these initiatives in place in 2020.
	5.3	The concessioner 's environmental emergency plans are coordinated and agreements in place with other applicable parties such as the NPS, other federal, state, or local environmental agencies.	Yes	The NPS is the primary response agency.
6. Reporting	6.1*	All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided to the NPS in accordance with the contract. Additional plans, reports, and other documentation are submitted to the NPS in accordance with the contract and documented EMP (if applicable). These may include inventories of hazardous substance and waste streams.	No	In several instances, documents were not submitted to regulatory agencies following the appropriate timeline. For example, the ORDEQ contacted the NPS Concession Specialist both in the summer and fall to request that the concessioner submit required forms related to operation of USTs. The posted Certificate to Operate the Mazama USTs was several months expired. Inventories of hazardous substances and waste streams were not reported (or documented), as required by the contract.
	6.2*	Notices of any discharges, release or threatened release of hazardous or toxic substance, material or waste are reported in a timely manner to the NPS in accordance with the contract.	N/A	None were reported to the NPS.
	6.3*	Any written, threatened or actual notices of violation of Applicable Law from any environmental regulatory agency are reported in a timely manner to the NPS in accordance with the contract.	N/A	None were reported to the NPS.
	6.4	The NPS is provided timely written advance notice of, and the opportunity to participate in, communications with regulatory agencies regarding the concessioner's environmental activities in accordance with the concession contract.	No	CLH did not appropriately communicate with regulatory agencies. The ORDEQ contacted the park on two separate occasions because CLH had not submitted required paperwork associated with their USTs. The NPS had requested to be present when tank testing was completed, but were not notified in advance.

<b>7. Monitoring, Measurement and Corrective Action</b>	7.1	Environmental inspections are completed as required by Applicable Law, the contract, the documented EMP (if applicable), or as otherwise necessary to effectively manage environmental activities.	No	The EMP states that an internal conformance audit, environmental compliance audit, and a management review meeting will take place every year. None of these were completed in 2019.
	7.2*	Environmental deficiencies identified by internal or external inspections (e.g., NPS concession environmental audits, etc.) are analyzed, corrected, or mitigated within the timeframes designated by Applicable Law, the contract, documented EMP (if applicable), or inspection report. Any deviations from these timeframes are accepted by the park and documented.	No	No formal audits were conducted this year, but several deficiencies were noted informally or through Periodic Evaluations that were not followed up on. For example, a pest management plan was never submitted to the NPS, including a list of proposed chemicals, as requested. Despite repeated prompting from the NPS, the outside dumpsters at Rim Dorm were never kept covered. A recycling program was also never implemented. No waste was diverted this year, as confirmed by the concessioner and waste hauler.
	7.3	Environmental incidents are responded to in a timely and effective manner to stop, contain, and remediate the incident. Investigations are conducted, and corrective actions are taken to prevent recurrences to the satisfaction of the NPS in accordance with the contract, EMP, and relevant regulations and NPS policies.	Yes	There were no environmental incidents reported. CLH did promptly investigate the surfactant release into the park wastewater system when prompted the NPS, discovered inappropriate use of cleaning chemicals and implemented corrective actions.
	7.4***	The EMP is reviewed at least annually, and updated as necessary. • The EMP review includes analysis of performance in each EMP element area to determine any systemic program failures (particularly failures that resulted in serious incidents of inspection deficiencies), and non-compliance with Applicable Laws. • Systemic problems are addressed in EMP updates.	N/A	This was the first year of the contract, so no updates have been made yet. In 2019, there was no designated employee to review or carry out the EMP on-site. Corporate level employees have come to the park on two separate occasions to review and support environmental compliance, but no changes or updates have been made yet that we are aware of. Aramark staff reported that no efforts were made in support of the EMP in 2019.
	7.5**	The initial EMP is submitted to the park within the contract specified timeframe for review, and is accepted by the park. Any subsequent documented EMP updates are submitted to the park for review and acceptance.	No	The initial EMP was due January 1, 2019. The EMP was submitted June 18, 2019, almost a full six months late and halfway through the operating year.
<b>8. Other Contract Requirements</b>	8.1	Contract-specific environmental requirements not otherwise addressed in the EMP standards are met.	No	The contract lists several environmental requirements and reports that were to be completed in 2019, including:  Zero Landfill Program* Solid Waste Audit with reduction by 75% in first year* Waste Stream Report Water Conservation Management Plan Water Savings Calculator used in kitchen operations Water Use Audit Computer-based Water Tracking System installed property-wide Annual Water Conservation Report Greenhouse Gas Emissions Report  No progress towards any of these was completed in 2019. * NPS staff discussed flexibilities as a result of changing recycling markets, however, no efforts were made to recycle as staff struggled to manage waste property-wide.

\* indicates a Special Attention Item

\*\* indicates item is not applicable to Cat III contracts

**ADDITIONAL NOTES / COMMENTS**

Please see attached narrative.

**Table 2: Scoring**

<b>Scoring</b>					
<b>Program Area</b>		<b>Score (%)</b>	<b>Program Area</b>		<b>Score (%)</b>
1. Environmental Management Program (EMP) Scope		100.0%	6. Reporting		0.0%
2. Responsibility and Accountability		0 0%	7. Monitoring, Measurement and Corrective Action		25.0%
3. Training		0 0%	8. Other Contract Requirements		0.0%
4. Documentation and Operational Controls		0 0%			
5. Communications		66.7%			
<b>Total - All Program Areas</b>					
<b># In Compliance (Yes)</b>	<b># Deficient (No)</b>	<b># Deficient (Special Attention Item)</b>	<b># N/A</b>	<b># Applicable Reqs.</b>	
6	15	2	3	21	
<b>Environmental Management Score</b>		<b>28.6</b>		Superior - 90 - 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = ≤49	
<b>Adjusted Environmental Management Score</b>		<b>28.6</b>			
<b>Rating</b>		<b>Unsatisfactory</b>			
<b>Notes:</b> - If 1-2 Special Attention Items are not in compliance, the Environmental Management Score is adjusted to Marginal and capped at 69. - If 3+ Special Attention Items are not in compliance, the Environmental Management Score is adjusted to Unsatisfactory and capped at 49.					

**United States Department of the Interior - National Park Service**  
**Form 10-AMP - Asset Management Program Evaluation Report**

<b>Park:</b> Crater Lake National Park	<b>Concessioner DBA:</b> Crater Lake Hospitality, LLC
<b>Concessioner Name:</b> Aramark	<b>Year of Operation:</b> 2019
<b>Contract Number:</b> CRLA004-18	

**Instructions**

The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

**Notes:**

- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the Instructions and TOC tab.
- To use Spell Check, hold Ctrl + Shift + S on your keyboard.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Annual Concessioner Maintenance Plan (ACMP)</b>	1.1	The ACMP is updated annually and submitted on time.	N/A	In the first year of the contract, CLH focused on identifying maintenance needs for future planning efforts. We expect to see these incorporated into a formal ACMP in 2020.
	1.2	The ACMP is accurate and complete	N/A	No ACMP in 2019.
	1.3	Projected maintenance expenditures are provided.	N/A	No RMR expenditures in 2019. General maintenance expenditures were not requested.
<b>2. Inspections</b>	2.1	Inspections were performed on schedule.	No	Daily system checks were not consistently performed between November and February, resulting in significant damage to Lodge after hydronic and fire suppression system failures went un-noticed by maintenance personnel. Critical system inspections were performed by vendors prior to facility openings.
	2.2	Inspection findings were addressed in a timely manner.	No	Initially, daily system check findings were not addressed because they were not performed properly. Most vendor inspection findings were addressed in a timely manner, with the exception of the fire alarm systems referenced in 3.4.
	2.3	Periodic evaluation facility findings were addressed in a timely manner.	No	Efforts were made by maintenance staff to correct some periodic evaluation findings, but several facility repairs were not completed in a timely manner despite being noted on multiple periodic evaluations. (Annie Creek exterior, Mazama Village fire panel communications, etc.)
<b>3. Maintenance</b>		Facility maintenance was performed as scheduled in a timely manner:		
	3.1*	Preventative Maintenance	Yes	Concessioner generally completed preventative maintenance tasks including cleaning and maintaining floors, servicing equipment, changing filters, replacing batteries, etc.
	3.2*	Recurring Maintenance	Yes	Plans have been submitted for several recurring maintenance projects including replacing carpet and painting all Lodge and cabin interiors. Touch up paint and drywall repairs were completed in Lodge rooms in advance of the summer season. Caulk was replaced in Lodge bathrooms.
	3.3	Scheduled Repairs	N/A	
	3.4	Unscheduled Repairs	No	Throughout the year, a number of items were identified by NPS that required repair. The concessioner either did not seem to be aware that these repairs were needed or did not make the repairs in a timely manner once they were identified. (Rim Cafe fire panel down for 5 months, Mazama dorm fire panels had continual unresolved issues, Mazama Store and Annie Creek Fire Alarm dialers non-functioning, Lodge boilers went down resulting in significant freeze and flood damage before repairs were made, Mazama Cabin water heater leaking with significant drywall and door damage, Exterior damage from snow at Annie Creek and Rim Dorm, unlockable exterior doors at Rim Dorm, unlockable bathroom stalls in Rim Cafe, etc.)
	3.5*	Component Renewal/Replacement	N/A	None in 2019.
	3.6*	Deferred Maintenance	N/A	None in 2019, Lodge roof replacement is due in 2020.
<b>4. Reporting</b>		Accurate and complete reports were submitted on time, in the correct format:		
	4.1	Annual Concessioner Maintenance Report	N/A	Due January 15.
	4.2	Concessioner Project Plan and Report	N/A	Due January 15.
	4.3	Fixture Replacement Report	N/A	Due January 15 (no fixtures replaced in 2019/LSI waived).
	4.4	Component Renewal Report	N/A	None in 2019.
	4.5	Personal Property Report	N/A	Due February 15.
<b>5. Computerized Maintenance Systems (CMMS)</b>	5.1	CMMS is maintained and current.	No	A CMMS system was just beginning to be developed in October. We expect to see this utilized in 2020.
	5.2	All maintenance actions and associated expenditures requested by the Service were provided in the correct electronic format.	No	CLH provided a list of maintenance projects completed in 2019, as requested. However, it lacks the level of detail that should be included with the CMMS reporting. We expect to see improved reporting in 2020 with the development of the CMMS.
<b>6. Other Contract Requirements</b>	6.1	Contract-specific facility maintenance requirements, not otherwise addressed in the AMP standards, are met.	No	CLH did not hire a maintenance manager until April, almost six months after taking over the contract, and maintenance manager was hired on a seasonal basis rather than permanent. Key management positions are to be filled within 60 days of vacancy. The Maintenance Plan lists a number of activities that should have taken place to reduce energy and water consumption within the first year of the contract. None of these were initiated in 2019.

\* indicates a Special Attention Item

ADDITIONAL NOTES / COMMENTS
Please see attached narrative.

Table 4: Scoring

Scoring				
Program Area	Score (%)	Program Area	Score (%)	
1. Annual Concessioner Maintenance Plan (ACMP)		5. Computerized Maintenance Systems (CMMS)	0.0%	
2. Inspections	0.0%	6. Other Contract Requirements	0.0%	
3. Maintenance	66.7%			
4. Reporting				
<b>Total - All Program Areas</b>				
# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Items)	# N/A	# Applicable Reqs.
2	7	0	11	9
<b>Asset Management Score</b>	22.2	Superior 90 – 100 Satisfactory 70 – 89 Marginal 50 – 69 Unsatisfactory ≤49		
<b>Adjusted Asset Management Score</b>	22.2			
<b>Rating</b>	Unsatisfactory			
<i>Notes:</i> - If 1-2 Special Attention Items are not in compliance, the Asset Management Score is adjusted to Marginal and capped at 69. - If 3+ Special Attention Items are not in compliance, the Asset Management Score is adjusted to Unsatisfactory and capped at 49.				

**UNITED STATES DEPARTMENT OF THE INTERIOR – NATIONAL PARK SERVICE**  
**Crater Lake National Park**  
**Aramark dba Crater Lake Hospitality**

**CC-CRLA004-18**  
**Annual Overall Rating Narratives**

**CFIP/Construction/Repair and Maintenance Reserve or Rehab Projects**

There were several CFIP projects scheduled to begin in 2019 per the contract, including the Rehabilitation of Rim Dormitory, Annie Creek Restaurant Improvements, Rim Village Café Building Improvements, and Mazama Village Camper Store Improvements.

The Rim Village Café project was partially completed in April 2019, as the retail cash wrap was moved and large scale images were added to the stairwell walls to encourage visitor use of the second floor. Additional improvements were made including new flooring and lighting throughout the retail space. The NPS provided a detailed review of the millwork drawings and raised concerns about how the proposed fixtures would meet Architectural Barriers Act Accessibility Standards. Although CLH noted that the fixtures were not permanently installed and adjustable, they did not provide direct responses to the concerns raised, as requested.

The other projects were not started and no design drawings or plans have been submitted to the NPS for review. Crater Lake Hospitality has prioritized replacement of carpet, paint, and personal property in the Lodge and Mazama Cabins in an effort to improve the visitor experience in these lodging facilities.

No Repair and Maintenance Reserve or Rehab Projects were undertaken in 2019.

**Leasehold Surrender Interest/Possessory Interest**

No new LSI was incurred during the 2019 operating period.

**Franchise Fees**

Crater Lake Hospitality submitted all Franchise Fee payments within the month they were due during the 2019 operating period. The contract required franchise fees to be paid by ACH or wire transfer, which was a new procedure for the park and required a timely review of the reconciliation report. In some months, the park issued the Bill of Collection very close to or after the 15<sup>th</sup> of each month. In some months, payment was not made by CLH until a week or more after receiving the BOC. However, Franchise Fee reconciliation reports were always submitted within the first week of the month and payments were always made in full and before the end of the month.



On several occasions CLH did not claim handicraft sales exemptions during the month they should have, resulting in corrections needing to be made in subsequent months. This seemed to be due to the timing of monthly accounting close outs. CLH accounting staff were cooperative in explaining the delays and appropriate corrections were made in future months. Improvements were made in reporting as the year progressed.

We expect both the NPS and CLH will become more efficient at accounting for handicraft sales, reviewing reconciliation reports, issuing BOCs, and making payments in 2020.

### **AFR**

As this was the first year of the contract, there was no AFR due during this rating period. The 2019 AFR was submitted January 24, 2020, within the 120 days of the close of the concessioner's fiscal year. The report was audited by an independent Certified Public Accountant in accordance with Generally Accepted Auditing Standards. This will be accounted for in the 2020 rating period.

### **Insurance**

Crater Lake Hospitality submitted COIs at the start of the contract, as required. The policy was renewed in June, but new COIs were not submitted until requested by the NPS in December. They were submitted promptly once requested.

An independent contractor, Northport Affiliates LLC., reviewed Crater Lake Hospitality's insurance documents and found several non-compliant areas of coverage based on insufficient documentation. Crater Lake Hospitality is actively working with the NPS and Northport Affiliates LLC to resolve these issues.

### **Risk Management**

In the first year of their contract, Crater Lake Hospitality did not demonstrate a strong Risk Management Program. The initial Risk Management Plan was to be submitted by March 1, 2019. Not only did CLH did not meet this deadline, it did not appear that efforts were being made towards the development of a formalized RMP or to incorporate the principles of risk management into daily operations until the NPS required the closure of the Mazama Fuel Station due to a lack of safety equipment, standard operating procedures, and required training. In response, an RMP and associated Emergency Action Plan and Emergency Response Plan were submitted on June 18, three and a half months late and halfway through the year. By that point in the season, a majority of managers and hourly staff were already working, so it is not possible that they received training on the RMP before beginning work.

Although the submitted RMP is structured to address the ten required risk-management elements, its scope does not fully address the risk management aspects applicable to the operations at Crater Lake. The RMP appears to be copied from another Aramark-managed concession operation, with minimal updates to address the expanded operations at Crater Lake. The plan lists vessels, busses, tour, general, and office operations and associated SOPs, several of which do not apply to Crater Lake. In several places the plan references another Aramark concession (Wilderness River Adventures) and regulatory agencies/locations in another state (City of Page, Coconino County, State of Arizona).

NPS concession staff made several requests for information associated with the RMP, including copies of the referenced Risk Management Log, SOPs, training plans and records, etc. Managers were not able to provide many of these resources and, in some cases, denied that they were necessary. It is clear that although an RMP was submitted, it was not a priority for management to become familiar with the plan or make efforts to implement it on-site.

Training was provided to staff through the use of on-boarding orientations, although these were not started until mid-way through the summer season. SAFE Briefs were used throughout the year as prescribed by corporate risk management, but there does not seem to be a record of topics or participants. SAFE Observations were also conducted, but there does not seem to be a record of the observations made or follow-up actions taken.

Along with the RMP, Crater Lake Hospitality did submit a detailed and comprehensive Emergency Action Plan and Emergency Response Plan. Once again, it appears that this was pulled from another property, as there are references to resources that do not exist at Crater Lake (Lodge Dispatch Office, NPS Facility Response Plan, incorrect phone and radio numbers, etc). However, most of the plans still apply and can be used once updates are made for these site-specific resources. It is unclear if this document has been made available to staff. As several of the procedures have not been followed, it appears unlikely. Once these plans are appropriately updated, all employees should be trained on these procedures and their role in reporting and responding to emergencies.

Crater Lake Hospitality struggled to properly maintain the fire alarm systems in almost every facility this year. The Rim Café fire alarm system malfunctioned in late November, leaving the building without a functioning alert system. The system was not replaced until late April, a full five months later. During this time, the NPS required CLH to close the facility due to the safety risk and their continued inaction to remedy the situation, leaving visitors with no food or retail services for several months. It should be noted that during this time access to Rim Café was limited for several weeks due to the government shutdown followed by heavy snow and road closures. However, accommodations were made for administrative access to the building and the system was still not repaired for almost two months after full access was provided.

The Mazama A Dorm fire panel also malfunctioned in late November and was not initially reported to the NPS. Complete repairs were not made until late December. Fire watches were conducted but were not enforced or documented for several days. Complete records of fire watches were never provided to the NPS as required along with documentation once the panel was repaired. Trouble and nuisance alarms continued at Mazama Dorms for several months, indicating continued and unresolved problems with the system. At one point, employees reported that they were so accustomed to hearing trouble alarms that they were no longer paying attention to them.

The Lodge fire alarm system was also a problem, with smoke detectors malfunctioning right up until opening day. In several instances while the Lodge was occupied with guests, NPS responders were alerted to alarms at the facility but found that the alarm had been silenced by staff and no evacuation had taken place. This demonstrated a lack of training on or concern for established protocols in the event of an emergency. The NPS provided very specific protocols for managing fire risk during the restoration work at the Lodge, but it was not always followed. In several instances the alarm system was turned off without notification or an interim fire watch being conducted. In at least one instance, contractors performed hot work in the Lodge without a permit in place.

Finally, communication lines associated with the Mazama Store and Annie Creek fire panels were not functioning for the majority of the year. The NPS followed up on this issue almost weekly with no resolution from CLH. By the end of the year, the Mazama panel was reported to have a functioning dialer, but the Annie Creek panel was still unable to communicate out as designed. It should be noted that this was not a problem prior to CLH taking over these facilities. The NPS also identified that CLH management had not properly updated their monitoring company with their contact information, resulting in a lack of response by CLH when the Lodge fire suppression system was compromised.

Boat operations were a challenge for Crater Lake Hospitality this year, with several notable failures in terms of risk management. The NPS has developed a comprehensive Boat Operations Plan establishing training requirements, SOPs, and reporting responsibilities. Not only was the plan not followed, most captains were not aware that it even existed for the majority of the season. Captains and boat staff were not provided with the required 40 hours of on-water training prior to starting boat operations and only one captain was present for the combined classroom training day. Required training records were requested on several occasions but they were never provided. Copies of Captains license's and CPR/First-Aid certifications were not provided until weeks after operations had begun and not all required USCG vessel inspection reports were provided.

The NPS questioned CLH's readiness to start boat tours as scheduled but were repeatedly assured that everything was being taken care of. However, on the first day of scheduled tours, an NPS inspector found that required safety equipment had not been placed on all vessels,

captains did not know how to perform vessel inspections, and radios were not yet functioning. During subsequent inspections, it was found that captains were still not aware of required safety equipment and procedures were not in place for tracking passengers getting on and off the boats at Wizard Island.

Several minor incidents took place including engine breakdowns and rock strikes. Incident reports were not submitted within 24 hours as required per the boat plan and had to be requested on several occasions from the NPS. On several occasions, boats were loaded beyond their passenger capacity limits, a USCG regulatory offense. When the NPS questioned CLH about this, the explanations provided were not consistent with the information documented on passenger manifests.

In general, employees seemed unaware of incident reporting requirements. Several vehicle accidents occurred during the year that went unreported, including one between a concessioner and visitor vehicle and another where a concession owned vehicle slid off the road and hit a tree. In another incident, visitors who had been in an accident were picked up by concession staff and brought back to the dorms for the night. The incident was not reported to the NPS until the next day.

Unfortunately, it does not appear that focused efforts have been made to establish a Risk Management Program at Crater Lake. Risk management activities seem to be prescribed at the corporate level, with little to no development of local resources in support of prescribed plans. With the General Manager identified as the Safety and Health Official and person responsible for implementing the Risk Management Program, it is not surprising that this program area has not received significant attention, as there has been much turnover in the GM position throughout the year. We look forward to seeing improvements to this program under more consistent leadership in 2020, including the re-submittal of a property specific RMP with supporting SOPs, identified training plans, improvements in reporting and corrective action, etc.

### **Environmental Management**

Crater Lake Hospitality was required to submit their initial Environmental Management Plan by January 1, 2019. CLH submitted their Environmental Management Program Plan (EMPP) on June 18, 2019, almost six months after it was due and mid-way through the operating season. By this point in the season, most employees had already begun work, so they were not trained on the elements of the EMP as part of their orientation training. Like the Risk Management Plan, the EMPP seemed to be submitted in response to the NPS closing the Mazama Fuel Station due to a lack of SOPs, training, and required safety and spill equipment.

Although the submitted EMPP addresses the required elements of an Environmental Management Program, very few, if any, of the activities outlined in the program plan have actually been implemented. For example, the plan describes how CLH “will develop an

Environmental Policy that outlines the desired course of action and guiding principles intended to influence and determine decisions and actions regarding environmental management.” This policy has never actually been developed. The EMPP describes a variety of roles and responsibilities for members of the Environmental System Management Team, but none of these roles have been assigned. Goals and targets for improvement are to be established and assigned based on an identified list of environmental aspects, but this list was never generated. A number of reports are to be generated annually, including an Inventory of Hazardous Substances and Inventory of Waste Streams, but these have not been prepared or submitted.

Some efforts have been made to communicate sustainability initiatives and/or environmental awareness to the visiting public. Lodging registration cards warn about human/wildlife interaction and placards in lodge rooms educate guests on water conservation. The CLH website lists a number of sustainability actions that CLH has supposedly taken to reduce their environmental footprint. However, CLH has not actually initiated any of these activities on site. The NPS did point this out in their review of the concessioner’s website, but it has not been addressed or changed. Internal communication has not taken place as described in the EMPP. The EMPP describes a staffing plan in which all training requirements for the respective positions have been identified and lists a variety of training formats. However, none of this training has been completed or documented. The EMPP describes procedures for monitoring, measurement, and corrective action, including an annual internal conformance audit, but this has not occurred.

SOPs for spill response and hazardous materials storage and communication are included in the submitted Emergency Action Plan/Emergency Response Plan. However, it does not appear that either of these SOPs have been followed. The Spill Response Standard describes a number of preparation measures to be taken in preparation for a potential spill, but it does not appear that these have been implemented. NPS evaluators found outdated spill procedures left in place from the previous concessioner posted throughout the property. The Hazard Communication SOP describes assignments and actions related to the storage and use of hazardous chemicals, but cleaning chemical storage and use was a consistent problem this year. Chemical stations were not installed in all facilities until partway through the season, so staff were using chemicals leftover from the previous concessioner with no instructions or SDS provided. NPS evaluators found bottles of unmarked cleaning chemicals being used throughout the buildings. At one point it was discovered that an industrial strength hood degreaser was being improperly used to clean floors, potentially draining into the wastewater system.

CLH did not establish SOPs for pest management and did not follow NPS established procedures for managing pests in 2019. They never submitted a pesticide use request as outlined in the contract, although detailed procedures had been sent to two separate individuals. Without notifying the NPS, CLH also hired a pest control company who put out bait stations both indoors and out. CLH did make some efforts to improve food storage in the Rim Café, but inspectors still found evidence of animals getting into storage areas throughout the summer.

CLH was not prepared to manage their underground storage tanks (USTs). No procedures were in place for filling or monitoring tank status and no employees had completed the state required training programs. After the NPS closed the Mazama Fuel Station due to a lack of procedures, training, and required equipment, an SOP was established. However, it was not being closely followed. Camper store staff were not reconciling daily fuel sales against the tank fuel volume and it was never confirmed if the remote tank monitoring system was operational before winter, as requested by the NPS. In both the spring and fall, the NPS was contacted directly by the Oregon Department of Environmental Quality because the concessioner had not submitted all required permits associated with the operation of their USTs.

CLH was required to implement a “Zero Landfill” program within the first year of operations, to include conducting a Solid Waste Audit by July 31 and subsequently reducing solid waste by 75% within the year. A Waste Stream Report was to be submitted at the end of the year. This program was not initiated and simply managing waste has been a consistent problem. Sufficient staff were not assigned to remove trash from visitor areas, resulting in overflowing trash containers both indoors and out. The park continued to receive complaints about overflowing trash in the Mazama campground all summer long. A 30-yard dumpster was placed outside Rim Dorm to collect trash from the Rim Café and Lodge, but staff continually removed the covers, allowing wildlife to access it. As confirmed by their contracted waste hauler, no recycling was collected in 2019.

It does not appear that efforts were made to reduce food waste or associated packaging. Despite having appropriate serviceware available, food at Annie Creek Café was served on disposable serviceware for the first few weeks of operation and several items were served in non-recyclable plastic clamshell containers all year long. Food composters were not installed in any kitchens as required and it does not appear that efforts were made to source food from local vendors, as Sysco seemed to be the only food supplier used.

The contract also requires several initiatives related to water and energy conservation. CLH was required to develop a Water Conservation Management Plan within the first 120 days of the contract and conduct a Water Use Audit by July 31<sup>st</sup>. CLH is also supposed to be working towards replacement of all existing fixtures with WaterSense compliant fixtures and installing remotely monitored water use sensors throughout the property. It does not appear that any of these initiatives were undertaken in 2019.

It is not surprising that so little was accomplished in regard to the Environmental Management Program at Crater Lake this year. Crater Lake Hospitality did not hire a designated staff member to oversee the Environmental Management Program and there were three different on-site General Managers and an interim General Manager in charge over the course of the year. On two separate occasions a corporate level Environmental Manager came to the park

and met with the NPS, but even they admitted that CLH had failed in regards to environmental management. We understand that this was the first year of the contract and that there were a number of other priorities to attend to, but it is disappointing that CLH made no visible effort towards meeting their environmental commitments in 2019. It is our understanding that CLH will be hiring a Sustainability Manager in 2020. We hope this is just the first step in implementing and supporting an active Environmental Management Program at Crater Lake.

## **Public Health**

USPHS completed two rounds of inspections during 2019, for a total of 12 individual inspections. 11 inspections resulted in “satisfactory” ratings for the facility. One inspection resulted in an “unsatisfactory” rating for the Lodge. The unsatisfactory rating was primarily a result of general cleanliness and food storage issues. Floors, surfaces, and service ware were not being thoroughly cleaned, flies were found in the bar area, and several food items were being held at temperatures outside of safe ranges. USPHS recommended that the facility develop a meal/daily/weekly cleaning schedule, with management verifying that all cleaning was taking place. The NPS conducted a follow-up inspection of the Lodge kitchen 10 days after the initial USPHS inspection and found that although there was some evidence of cleaning, many of the same issues identified in the initial inspection remained, including improper food labelling, food being held at unsafe temperatures, dust and food debris on floors and surfaces, etc. Based on the findings, the NPS issued an unsatisfactory periodic evaluation score for the inspection.

USPHS returned the next month to re-inspect all facilities. Although the Lodge received a “satisfactory” rating, the inspector expressed concern over several lingering deficiencies and required management to provide a written response of how violations were being addressed within seven days of receiving the report. Although the NPS did note further improvement during follow-up periodic evaluations, it was disappointing that it took much of the season for this facility to achieve basic compliance with public health standards.

All other facilities received a “satisfactory” rating on both inspections. Violations noted at the Rim Café included insufficient hot holding temperatures and some cleanliness issues. It should be noted that the Rim Café received a low score on a late-season periodic evaluation due to public health violations including improper holding temperatures and food storage, insufficient labelling, and food being prepared in an open-air warehouse area without sufficient sanitation standards in place.

Annie Creek Café received several violations for minor cleaning issues but was overall well-maintained throughout the season. Managers and chefs at Annie Creek should be commended for their commitment to improvement over the course of the season and for maintaining high standards in this facility.

## **Asset Management**

In the first year of their contract, Crater Lake Hospitality was primarily reactive in terms of asset management. Rather than proactively developing a comprehensive maintenance plan for the property, staff were focused on learning the operations and responding to problems as they arose.

The maintenance division seemed to suffer from a lack of personnel for the majority of the year. Although contractually required, it was not until after significant system failures had taken place at the Lodge that an actual Maintenance Manager was hired, six months into the contract. The Maintenance Manager was also hired on a seasonal basis, with a second employee filling in as manager during the winter months. It is unclear how CLH is going to plan and manage their required CFIP workload as well as other contractually required facility upgrades without this key position on-site for a significant portion of the year.

The staffing plan included bringing in maintenance staff from other properties to handle much of the workload during the winter. This proved problematic as there was no continuity once these employees returned to their respective operations. This was particularly frustrating for NPS maintenance staff who had spent time training these employees on the nuances of the facilities and systems. Throughout the year, maintenance staff seemed to be overwhelmed with the workload, with several working extended hours without days off for weeks in a row.

In the first half of the year, staff were not consistent or thorough in completing daily system checks, leaving critical systems vulnerable to failure. Despite repeated warnings from NPS concession and maintenance staff, several items went unaddressed for extended periods of time, resulting in preventable damage and facility closures.

Most notably, the Lodge experienced significant damage to the hydronic and fire suppression systems over the winter that could have been prevented by simply following up on minor maintenance to the boilers and consistent monitoring of the building's heating system. Over 20% of the unit heaters throughout the facility required repair and extensive water extraction and mold remediation work had to be completed in the kitchen and basement areas prior to opening the Lodge. Throughout the duration of the repairs the NPS requested plans, updates, contractor schedules, hot work permits, etc. These were not provided on a regular basis despite repeated requests, likely due to the fact that there was no designated project manager until the Maintenance Manager was hired mid-way through the repair process.

Fire alarm systems were not functioning properly at various times throughout the year in the Mazama Dorms, Mazama Store, Annie Creek Café, and Lodge. The Rim Café fire alarm panel stopped working in late November but was not replaced until late April, resulting in the building being closed to the public for several months during the spring season. For almost the entire year, phone lines associated with the Mazama Village fire alarm panels were not maintained,



meaning that monitoring services could not be notified in the event of an alarm. The Mazama Dorm fire system experienced numerous and unexplained nuisance alarms throughout the year. CLH seemed to struggle to get contractors to work on the systems and did not seem to be prioritizing these critical repairs.

Numerous facility deficiencies were noted during formal and informal evaluations, with several being left unaddressed throughout the year. For example, Annie Creek Café was missing several large pieces of exterior siding and fascia boards for the entire summer season. This building is adjacent to the primary park entrance station and highly visible to the public. Mazama and Rim Dorms also had significant exterior damage from the snow load that went unrepaired. Many obvious deficiencies had gone unnoticed by maintenance staff until they were pointed out by NPS concessions staff. For example, during an inspection of the Mazama Cabins a water heater was found to be leaking so badly that the adjacent drywall and door were fully saturated and deteriorating, with water flowing across the exterior concrete. Additional smaller deficiencies included items like burned out light bulbs or damaged ballasts, doors that wouldn't lock, open junction boxes, missing escutcheons, and general wear and tear to facilities.

Numerous upgrades to improve water and energy efficiency are outlined in the contract maintenance plan but were not completed in the first year as scheduled, including:

- Upgrade all interior and exterior lights to EnergyStar compliant LED and develop lighting plans that meet Might Sky, Historic District, and public safety requirements
- Replace all ice machines with EnergyStar-rated models
- Install kitchen dishwashing machines that meet or exceed WaterSense conservation criteria
- Install an organic digester at Annie Creek Café and Rim Café for food waste and compostable serveware
- Install washing machines in employee housing that meet WaterSense and EnergyStar conservation criteria
- Replace Camper Store laundry washing machines with highest WaterSense-rated efficient units
- Remove Camper Store drying units and replace with high efficiency units
- Install low-flow WaterSense pre-rinse spray valves in every kitchen and food prep area
- Replace all fixtures in public restrooms, food service areas, employee housing, campground comfort stations, shower facilities, and maintenance areas with low flow WaterSense compliant fixtures
- Replace all Lodge and Cabin shower heads, tub faucets, sink faucets, and toilets with low flow WaterSense compliant fixtures

As noted in the CFIP section, project proposals seem to be focused on “refreshing” design elements in visitor use areas rather than upgrading or remodeling facilities, as outlined in the

contract. Although we appreciate these efforts to improve the visitor lodging experience, we do hope to see significant progress towards the contractually required facility upgrades in 2020.

Additionally, project proposals have been vague and lack the level of detail requested by the NPS in order to make compliance decisions. For example, one project proposal simply stated “windows” as materials. Other projects have had change requests after approval for items that should have been identified during project development, indicating a lack of initial planning. Project proposals should be thought out well in advance and provide a higher level of detail to allow the NPS to conduct more complete and efficient compliance reviews.

Despite the initial challenges, we do believe that maintenance staff made an earnest effort to maintain concession assets as the year progressed. The following projects/work was completed in 2019:

- Added 600 gallons of propylene glycol to Lodge hydronic system to protect against future freeze damage
- Extracted 2,800 gallons of water from secondary containment around Lodge diesel tanks
- Stripped and replaced caulk around tub surrounds in all Lodge guest bathrooms
- Replaced numerous pieces of personal property throughout (deep fryer, tilt skillets, undercounter coolers, ice makers, reach-in coolers, employee washer/dryers)
- Overhauled fuel injector system on emergency generator in Mazama housing area
- Upgraded Metasys HVAC computer system at the Lodge and Mazama Village
- Replaced water heater elements in Mazama Cabins
- Replaced hot water recirculation pump in Camper Store mechanical room
- Replaced or repaired several damaged water spigots and campsite posts in Mazama Campground
- Constructed “A-frame” covers to provide access to propane tanks for winter fueling
- Conducted standard preventive and corrective maintenance including patching and painting drywall, replacing lighting, refinishing floors, emptying grease traps, servicing boilers, etc.

In 2020 we look forward to the development of an Annual Concessioner Maintenance Plan to identify projects well in advance to ensure proper prioritization, thorough planning, and realistic scheduling. We also hope to see more consistent and robust staffing in the maintenance division to allow staff to be more proactive in their approach to facility management. The CMMS was just starting to be developed at the end of the year. We expect this project to be completed and utilized in 2020 to ensure proper tracking of assets and facility work completed by the concessioner.

### **Administrative Compliance Reporting**

Crater Lake Hospitality provided all required services and generally met administrative reporting requirements. CLH submitted all Franchise Fee reports on time for the NPS to review.

There were several months when Native American Handicraft exemptions were inaccurately reported. However, CLH accounting staff were always transparent and willing to work with the NPS to correct any errors or omissions and processes improved throughout the year. There was no RMR spending this year. Water, wastewater, and fuel are provided by the NPS, with CLH being billed for water and sewer services. Of the seven utility bills that were sent to CLH, four were paid more than 30 days after the bill was issued. There seemed to be issues with CLH sending payment to Yosemite instead of Crater Lake, as they hold the concession contract there as well.

The marketing division was proactive in requesting NPS review of marketing and informational material and incorporated NPS requests and suggestions when possible. Requests for lodging rates were submitted on schedule, with supporting documentation provided. Food and beverage rate requests were submitted, but with less detail. In several instances core menu items were changed or not served as described. We expect to see improvement in this area in 2020 with a new executive chef on board to prepare menus in advance. In several instances, requested retail product invoices were not provided, or prices were found to be higher than approved, resulting in deficiencies on periodic evaluations.

Employee training seemed to be lacking throughout the year. Orientations for hourly staff were not conducted until mid-way through the season, meaning that a large number of employees received no formalized training on company policies, risk management, environmental management, customer service standards, etc. It does not appear that there are training plans in place for employees or training records being maintained by management.

The concessioner struggled with personnel management in 2019. Several key positions were not consistently filled throughout the year, including the General Manager and Mazama Village Manager positions. For several months of the year the GM position was being filled remotely by a District Manager from (b) (6). There were at least three different Mazama Village Managers who had been brought in from other properties. All but two boat captains had to be brought in from other Aramark properties after CLH failed to hire enough qualified captains to maintain the boat tour operation. Throughout the year, there seemed to be only one employee on the property who was familiar with the reservation system, leaving large gaps in service when that employee was not available.

Employee conduct in housing was a recurring problem throughout the season. Although CLH has an employee handbook which outlines standards of behavior, managers seemed to be unwilling or unable to enforce the policies. There was no leadership assigned to Rim Dorm for the majority of the summer season. NPS Rangers and concessions staff regularly found evidence of alcohol in public spaces, underage drinking, and drug use. There were several reported sexual assaults and at least one wildland fire started by employees near the housing area. During one significant encounter between residents and Law Enforcement Rangers, in which it appeared that residents were working together to interfere with an investigation and

arrest, one resident was recorded on camera stating that they knew they could engage in inappropriate conduct and still not be terminated.

Employee satisfaction was low, with the NPS receiving numerous complaints from concession staff about incorrect pay and benefits. During a periodic evaluation, an NPS concessions manager was told by at least two staff members that they were quitting due to the gross mismanagement taking place. The NPS also received comment cards in which visitors noted that concession employees had complained about poor working conditions, including long hours and a lack of timely or correctly calculated pay. Employees reported that HR was unresponsive to their requests.

### Annual Visitor Use Statistics/Utilization Data

Service/Facility	2017 Customers	2018 Customers	2019 Customers	Percent Change over 2018 (*2017)
Crater Lake Lodge	<b>(b)</b>	<b>(4)</b>	<b>(4)</b>	
Mazama Cabins				
Mazama Campground				
Boat Tours				
Lodge Restaurant				
Annie Creek Restaurant				
Rim Café				
Service/Facility	2017 Rooms/Sites	2018 Rooms/Sites	2019 Rooms/Sites	Percent Change over 2018
Crater Lake Lodge	<b>(b)</b>	<b>(4)</b>		
Mazama Cabins				
Mazama Campground				

Park visitation was slightly lower in 2019 than in 2018 and 2017. The park was closed for most of January due to the government shutdown and visitation was lower than usual in February due to record snowfall and resulting road closures. However, with little wildfire activity in the area, visitation was higher in July and August.

All concession operations opened on schedule except for boat tours. Although there was still visitor demand in late September and early October, CLH chose to not extend any operations past the scheduled closing dates. There was limited availability of sites in the Mazama Campground due to the ongoing hazard tree removal project. Numerous reservations had to

be cancelled and accurate use numbers were not readily available. The increase in occupancy of the Mazama Cabins may have been attributed to the limited number of available campsites.

The number of food and beverage covers was down significantly from 2017 across all facilities. (2018 numbers were not reported) This is likely due to a number of factors. Rim Café was closed from January through April due to the government shutdown, road closures, and an inoperable fire alarm. There were significantly less visitors staying in the Mazama Campground during the months of June, July, and August, which could have impacted all facilities. Additionally, limited staff in the Lodge dining room resulted in long waits and tables not being seated. The park received one report of a large tour group having to leave before getting to eat their scheduled breakfast due to the exceptionally long wait time after kitchen staff had called in sick.

Boat tours were provided for four weeks less time than in 2018. The start date was delayed due to a heavier snowpack over the preceding winter and a lack of boat staff. CLH also chose to end boat tours immediately following Labor Day due to internal problems with staffing and morale.

### **Problems/Issues and Resolution**

Crater Lake Hospitality struggled to meet and maintain service standards in almost all operational areas this year. As noted in the Administrative Compliance Reporting section of this report, many problems seemed to stem from personnel issues including insufficient staff to meet the needs of the operations, lack of training and management oversight, conduct issues, and constant turnover in management positions. HR services were lacking and numerous employees complained of inaccurately recorded hours and incorrect pay calculations, resulting in extremely low morale. Employee conduct in concessioner housing was an ongoing problem that went unaddressed for several months, despite repeated encounters between concession staff and NPS law enforcement.

As a whole, CLH seemed to be unprepared for operations across the board. Sufficient staff were not in place to prepare facilities for scheduled openings. There was minimal housekeeping staff for the first several weeks of operation of the Lodge and Mazama Cabins. Visitors experienced long waits for their rooms to be ready and the park received several comments noting the lack of cleanliness in the rooms, as no deep cleaning or basic maintenance was conducted prior to opening. Trash cans were often overflowing in the campground and other visitor use areas as there were not enough staff devoted to maintaining them. Lodge kitchen staff lacked training and oversight, resulting in several failed inspections. Food shortages occurred several times throughout the summer due to inefficient food ordering and storage procedures. As staff were required to begin work immediately after arrival, sufficient training was not conducted, resulting in staff lacking knowledge of the park,

concession operation, and even their basic job responsibilities, as witnessed by NPS concession staff.

The boat tour operation was a particularly low point for Crater Lake Hospitality this year. The Boat Operations Manager and staff were not familiar with the Boat Operations Plan, although it is part of the contract, was reviewed with management in advance of the season, and was presented as part of a combined training between NPS and CLH boat staff. CLH failed to hire sufficient staff to run the full schedule of boat tours. Captains had to be brought in from other Aramark properties the week before boat tours were scheduled to begin, resulting in a haphazard opening as their limited time was spent trying to prepare boats and associated equipment rather than training on safety and tour procedures. The morning that boat tours were scheduled to begin, all required safety equipment was still not on board each of the vessels, captains were unaware of vessel inspection procedures, the Wizard Island dock was not in place, and IT equipment was just being set up and tested. Although required by the boat plan and requested by the NPS, several items were submitted late or not at all, including training records for boat staff, First-Aid/CPR certifications, and USCG inspection reports for all three vessels. A lack of leadership and oversight resulted in extremely low morale throughout the season. During a special boat operations training day that the NPS hosted for the late arriving captains, captains shared problems including a lack of organization and training, insufficient IT and communication equipment, overbooking and inaccurate booking by CRES and on-site ticket sales outlets, and accuracy of their pay. NPS concessions staff observed additional problems including incomplete boat inspections and logs, poor communication between staff and significant attitude and morale issues. The NPS also found evidence of boats being loaded beyond the USCG capacity limits, a regulatory offense.

Other problems included lack of understanding of reservation procedures by both on-site and central reservation staff, particularly for the campground. Callers would get different answers depending on who they spoke with, resulting in confusion and frustration. Although required by the contract, the campground reservation system would not allow guests to select their own sites and managers seemed unable to make a consistent determination on how premium sites (electric, full hook-up, ADA) would be booked in advance. For several weeks, walk-in campground guests were not being allowed to stay more than one night at a time due to a misinterpretation of contract requirements. In some instances, Senior Pass discounts were not honored in the campground as staff had not been trained on procedures.

Refunds for cancelled lodging and boat tour reservations were not processed in a timely manner, resulting in dozens of calls and emails to the NPS by upset guests. At both the beginning and end of the boat tour season, hundreds of visitors arrived at the park unaware that their boat tours had been cancelled, as sufficient advance notification had not been made. This could have been avoided in the first place if CLH had heeded the advice of the NPS to not take advance reservations for these times due to uncertainty of weather and trail conditions. Additionally, CLH chose to end boat tours immediately following Labor Day, despite having

taken reservations for an additional week. Once again, hundreds of visitors arrived at the park extremely upset that their tours had been cancelled.

Crater Lake Hospitality struggled with IT and communication issues across the board. For most of the year phone lines were not working. Visitors could not reach the Lodge front desk to inquire about their lodging reservations or make dinner reservations. Voicemail boxes either did not work or were too full to accept additional messages. The NPS received dozens of calls and emails from angry visitors trying to reach the concessioner throughout the summer. Phone lines associated with fire alarm panels were not maintained, meaning authorities would not be notified in the event of an alarm. On-site IT personnel were never hired to address the problems, which have now continued into the second year of the contract. It should be noted that all of these systems were working properly prior to CLH taking over the operation.

As noted in other sections of this report, the Risk Management Plan and Environmental Management Plan were submitted late and did not fully reflect the Crater Lake operation. Managers did not seem to be knowledgeable about what was contained in either plan and staff assignments were not made to carry out the plans. The asset management program suffered from a lack of qualified maintenance staff who could understand and maintain critical building systems, resulting in costly failures at the Lodge.

The NPS addressed all of these issues with CLH throughout the course of the year. Although some were resolved, many were allowed to continue, demonstrating a general disregard for meeting operational standards and expectations set forth in the contract. Although the NPS provided advice to try and assist CLH in their first year of operations, it was not always heeded, resulting in several costly and highly visible failures. The Lodge hydronic system failure, boat tour cancellations, and food shortages at the Lodge being several prominent examples.

On-site management has acknowledged all of these failures and has made efforts to resolve some of these problems. Managers were eventually required to stay at Rim Dorm on a rotating basis to address the ongoing conduct issues. A new HR manager is being hired to handle personnel issues. A Sustainability Manager is being hired to implement the Environmental Management Plan and associated contractual requirements. A new chef has been hired to lead operations in the kitchens. At the end of the year, CLH hired their third General Manager. He has been thoroughly briefed on the problems that occurred during the first year of operations and seems eager to make improvements. It is our hope that continued emphasis will be made on filling key positions and providing the resources necessary to ensure quality visitor services.

### **Visitor Satisfaction**

The park received 224 comments pertaining to Crater Lake Hospitality's facilities or operations in 2019. 171 comments were negative or included negative elements, 37 comments were positive or included positive elements, and 27 comments were neutral or simply suggestive (ie.

“you should have a sign indicating more seating upstairs”). It should be noted that these comments do not include the hundreds of calls and emails the NSP received from visitors simply trying to get in touch with the concessioner about lodging and dinner reservations, cancellations, refunds, etc.

Positive comments were primarily focused on friendly or helpful service from particular staff members. Negative comments were wide-ranging but many concerned a lack of cleanliness in the Lodge, poor food service or offerings, and the inability to contact the concessioner for various reservation issues, especially dinner reservations at the Lodge. Negative comments were also received pertaining to the Mazama Campground including the walk-up registration procedures, overflowing trash cans, and poorly maintained bathrooms. Numerous complaints were received concerning a lack of notification about early season boat tour cancellations and the cancellation of boat tours in the week following Labor Day, which was at the concessioner’s discretion. Many comments referenced the lack of knowledge or customer service exhibited by concession staff. Several comments of note referenced staff having a “not my problem” attitude or even laughing at visitor requests.

It is notable that several comments expressed concern for the well-being of staff members, particularly at the Lodge, indicating that staff were visibly unhappy and were sharing their grievances with visitors. NPS staff also received numerous comments directly from CLH staff members pertaining to working conditions, accuracy of pay, lack of leadership, etc. This is the first time that concession staff have actively sought out NPS representatives to express grievances, as they felt they were not being addressed by concession management.

After several requests, Crater Lake Hospitality did provide a copy of their customer satisfaction report. 1793 responses were received from visitors who had held lodging or boat tour reservations. The report only provided an overall rating and comment. On a 1 to 5 satisfaction scale, 367 responders (20%) rated their experience as a one or a two overall, or dissatisfied, 793 responders (44%) rated their experience as a three or four, or neutral, and 633 responders (35%) rated their experience as a five, or exceptional. It should be noted, however, that comments accompanying ratings did not always seem to reflect the numeric score. For example, some exceptional ratings were accompanied by comments reflecting dissatisfaction with services received. Next year the NPS will work with CLH to select more meaningful metrics to try and determine areas that were successful and that needed improvement.

### **Future Plans for Concession Operations**

As outlined in this narrative, 2019 was a challenging year for Crater Lake Hospitality as they struggled to provide for the basic operational needs of the Crater Lake concession contract. With the primary focus being on simply maintaining visitor services, several key contract requirements and initiatives were not thoroughly supported or enacted in 2019. The following



items are directly correlated to the safety of staff and visitors, conservation of resources, and facility management and should be prioritized for completion in 2020:

1. Re-submit a Risk Management Plan that covers the ten risk management elements and fully addresses the scope of the operations at Crater Lake **no later than July 1, 2020**.

(Exhibit B: Operating Plan, B-15)

- Assign a Safety and Health Official with responsibility for carrying out the RMP
- Develop resources in support of the RMP, including SOPs, training plans, data management system, etc
- Ensure all staff receive training in the RMP prior to beginning work for the season
  - Identify and execute duty-specific training plans as needed
- Update the existing Emergency Action Plan/Emergency Response Plan to accurately reflect park operations and conduct training on emergency procedures
- Document all training and maintain records on-site

2. Submit a document outlining how the Environmental Management Program described in the submitted Environmental Management Program Plan will be implemented on-site **no later than September 1, 2020**. (Exhibit B: Operating Plan, B-15)

At a minimum, the document must include the following:

- Provide a clear statement of the Concessioner's commitment to the Environmental Management Objectives (policy).
- Assign an Environmental Program Manager with responsibility for carrying out the established EMP.
  - Identify environmental responsibilities for employees and contractors
- Identify a list environmental goals for the organization with specific targets for achievement within the year
- Identify how the concessioner will manage environmental information, including plans, permits, certification, reports, and correspondence with environmental agencies and report environmental information to the NPS
- Identify plans for self-assessment of performance under the EMP and describe procedures to be taken to correct any deficiencies identified

Additionally, the concessioner must:

- Develop site-specific resources in support of the EMP, including plans, procedures, manuals, etc.
- Ensure all staff receive training on the EMP prior to beginning work for the season
  - Identify and execute duty-specific training plans as needed
- Document all training and maintain records on-site

3. Implement programs to reduce solid waste generation and improve storage, collection, and disposal procedures, as outlined in the Maintenance Plan (Exhibit H: Maintenance Plan, H-16)
  - Work with contracted waste hauler to begin recycling all readily accepted materials **no later than July 1, 2020**.
  - Implement the Zero Landfill Initiative and **work towards 75% reduction of waste in 2020**, or propose an alternative goal with a detailed justification if current recycling market conditions make the contract goal unobtainable.
    - Conduct a solid waste audit **by August 31, 2020** to establish a baseline of solid waste disposal at Crater Lake (May need to be deferred due to COVID-19 related operational changes in 2020)
4. Implement programs to improve water and energy efficiency across the operation, as outlined in the Maintenance Plan (Exhibit H: Maintenance Plan, H-16)
  - Submit a Water Conservation Management Plan that identifies the physical change initiatives, operational changes, continuous search for new technologies, employee engagement, and annual conservation goals of the concessioner **by September 30, 2020**.
    - Conduct a comprehensive water use audit of all assigned buildings at Crater Lake to document baseline usage **by September 1, 2020**. (May need to be deferred due to COVID-19 related operational changes in 2020)
5. Prepare an Annual Concessioner Maintenance Plan and Report (Exhibit H: Maintenance Plan, H-19) to identify projected maintenance activities for 2020 and beyond and submit to the park for review and approval **by August 1, 2020**.
  - Work with the NPS to establish a schedule for submission of Project Statements well in advance of planned work to allow sufficient time for review and approval.
6. Prepare a Concessioner Project Plan and Report (Exhibit H: Maintenance Plan, H-19) to identify new construction, Major Rehabilitation, and Component Renewal projects scheduled for 2020 and beyond and submit to the park for review and approval **by August 1, 2020**.
7. Develop, implement and administer the Computerized Maintenance Management System (Exhibit H: Maintenance Plan, H-3) and begin using it to track the condition and work associated with concession facilities **by the end of 2020**.

Additionally, we expect to see improvements in the areas of Operational Performance and Public Health as CLH managers continue to refine these operations based on lessons learned in the first year of the contract. Priorities should be guided by contractual requirements and the results of this AOR, with input from NPS concession managers.

Although the concessioner is also required to provide lodging, food and beverage, and retail services at the Chateau in Oregon Caves National Monument, these services were not provided in 2019 as the Chateau was closed due to an ongoing NPS project to rehabilitate the historic structure to meet life, health, safety and accessibility standards. The Chateau will remain closed until at least 2021. We look forward to seeing CLH's plans for providing services for visitors to Oregon Caves once the rehabilitation project is complete.

### **Accomplishments or Outstanding Work**

This was an extremely challenging year for Crater Lake Hospitality. Most operations struggled due to a lack of planning and resources including sufficient staff, thorough training, and management oversight. However, there were still some areas where CLH staff and managers showed exemplary commitment to meeting the needs of the park and its visitors.

Although it was not ideal, Crater Lake Hospitality looked to creative solutions to solve their staffing shortages, including bringing in accomplished managers and staff from other Aramark properties. Several of these managers demonstrated a sincere desire to improve operations during their time here and we appreciate their efforts.

Crater Lake Hospitality also demonstrated a willingness to work with the NPS on changing their initially submitted tour boat design to better meet the needs of the operation. Although it will delay the arrival of the new boats, the new design will be safer and more suited to the Crater Lake environment. The new boats should better accommodate visitors by providing more available seats on tours, accommodations for mobility-impaired passengers, less noise and a smoother ride. The new boats will also have improvements in the fuel management system in order to minimize impacts on water quality. We appreciate the flexibility and willingness to collaborate on this undertaking. It should greatly improve the boat tour experience for park visitors.

Unfortunately, there was a visitor fatality at Cleetwood Cove this summer. Boat tour staff were responsive to the needs of bystanders and the NPS, assisting with search efforts and performing crowd control on scene. We truly appreciate their willingness to step up and assist during this challenging event.

Although CLH struggled to maintain standards in several food and beverage facilities, Annie Creek Café was consistently well-managed throughout the year. The manager and chefs were highly committed to meeting public health and customer service standards. The few deficiencies noted during evaluations were immediately addressed and did not reoccur. Suggestions made by USPHS were incorporated into the operation and resulted in improvements to accountability for cleaning and other daily tasks.

Finally, CLH managers were extremely patient in dealing with the ongoing hazard tree removal project in the Mazama Campground. Although scheduled to be completed by early summer, the project went on until early September, necessitating extended closures of several loops in the campground and hundreds of cancelled reservations. Despite the hardship this caused, managers continued to work positively with the NPS throughout the process of cancelling additional reservations and campground staff continued to seek positive outcomes for guests impacted by the cancellations. We look forward to seeing how CLH will manage the campground next season without the added challenge of this long-running and highly impactful tree removal project.

**United States Department of the Interior - National Park Service  
Annual Overall Rating Report**

*Contract Information*

**Instructions:** Fill in the corresponding contract information.

*Note: To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.*

Year of Operation:

2020

Park Crater Lake National Park

Contract Term Effective Dates

11/1/2018 - 10/31/2028

Concessioner Name Aramark

Concessioner Doing Business As

Crater Lake Hospitality, LLC

Contract Number CRLA004-18

Evaluator Name

(b) (6)

Date of Review

12/31/2020

Please indicate below whether the following criteria areas apply to the concessioner being evaluated

Program Area	Applicability (Yes/No)
Environmental	Yes
Public Health	Yes
Asset Management	Yes

*Applicable to all 1998 Law Contracts*

*Applicable to contracts with one or more of the following services: food & beverage, swimming pools, and thermal baths*

*Applicable to all Category I and II Contracts*

**Service Types**

**Instructions:** Add an X next to all applicable service category provided under this Contract. Scroll over service category for a list of all sub-categories.

Air		Lodging	X
Automobile Services	X	Other	X
Boats		Recreation	X
Food and Beverage (F&B)	X	Retail	X
Horse & Mule		Transportation	
Land		Water	X

**United States Department of the Interior - National Park Service**  
**Form 10-AOR - Annual Overall Rating Report**

Year of Operation: 2020

Park: Crater Lake National Park

Contract Term Effective Dates: 11/1/2018 - 10/31/2028

Concessioner Name: Aramark

Concessioner DBA: Crater Lake Hospitality, LLC

Contract Number: CRLA004-18

**Table 1: AOR Score**

Category	Scores	Adjusted Scores	Rating
Administrative Compliance (10-ADM)	78.6	69.0	Marginal
Operational Performance (10-OPR)	72.2	72.2	Satisfactory
Public Health (10-PHP)	100.0	100.0	Satisfactory
Risk Management (10-RMP)	75.0	75.0	Satisfactory
Environmental Management (10-EMP)	50.0	50.0	Marginal
Asset Management (10-AMP)	61.5	61.5	Marginal

AOR Score 72.9

Adjusted AOR Score 71.3

Rating Satisfactory

Superior = 90 – 100  
 Satisfactory = 70 – 89  
 Marginal = 50 – 69  
 Unsatisfactory = ≤49

**Notes:**

- The final AOR score is the average of all applicable category scores. The Adjusted AOR Score is used for ADM, PHP, RMP and EMP (see individual pages for details).
- If the Concessioner receives an Unsatisfactory on any of the forms, the final AOR score is capped at 69 and final AOR rating can not exceed Marginal.
- If the Concessioner receives a Marginal on any of the forms, the final AOR score is capped at 89 and final AOR rating can not exceed Satisfactory.
- If a periodic evaluation (10-OPR) has not been completed for the contract during the year of operation, the final AOR score is capped at 89 and final AOR score can not exceed Satisfactory.

**Table 2: Superintendent Approval / Signature**

**Superintendent Approval / Signature**

**Instructions:** The park superintendent has the authority to adjust the final concessioner AOR rating. Please use the space below to enter the final superintendent-approved rating. If the rating has been altered from the calculated rating (shown above), please also include notes to explain why the change occurred. Please see Tab "Instructions and TOC" for instructions on signing AOR.


Superintendent Approved Rating

**Satisfactory**

**Narrative** (explain reasoning for any changes made by the superintendent)

I concur with the rating assigned and supporting information and narratives.

Superintendent's Signature



Date

6/14/2021

Concessioner Signature

(b) (6)

Date

(to signify receipt of rating)

**Table 3: Evaluation Narratives**

Evaluation Narratives	
<p><b>Instructions:</b> Narrative assessment and comments on the Concession Annual Overall performance for the year are mandatory. Please use the outline below to organize the narratives. Enter "N/A" under outline headers which are not applicable.</p> <p>If you wish to attach a separate document to this Workbook as supporting materials, please see the instructions located on Tab "Instructions and TOC". Refer to any attachments in the space provided below. Please also use attachments if your text does not fit inside the boxes below.</p> <p><i>Hint: To start a new paragraph in the comments area, hold the ALT key and hit enter twice, then continue typing the next paragraph.</i></p>	
<b>CFIP / Construction / Repair and Maintenance Reserve or Rehab Projects</b>	Please see attached narrative.
<b>Leasehold Surrender Interest / Possessory Interest</b>	Please see attached narrative.
<b>Franchise Fees</b>	Please see attached narrative.
<b>AFR</b>	Please see attached narrative.
<b>Insurance</b>	Please see attached narrative.
<b>Risk Management</b>	Please see attached narrative.
<b>Environmental Management</b>	Please see attached narrative.
<b>Public Health</b>	Please see attached narrative.
<b>Asset Management</b>	Please see attached narrative.
<b>Administrative Compliance Reporting</b>	Please see attached narrative.
<b>Annual Visitor Use Statistics / Utilization Data</b>	Please see attached narrative.
<b>Problems / Issues and Resolution</b> (include outstanding problems/issues and intended resolution)	Please see attached narrative.
<b>Accomplishments or Outstanding Work</b>	Please see attached narrative.
<b>Future Plans for Concession Operation(s)</b>	Please see attached narrative.
<b>Visitor Satisfaction</b>	Please see attached narrative.
<p><b>Final Remarks:</b></p> <p>The COVID-19 pandemic presenting unimaginable challenges at Crater Lake Hospitality entered their second season. Crater Lake National Park closed to visitors in March, not to reopen until June. During that period CLH and NPS staff worked together closely to develop a plan to operate visitor services in a manner that protect the health of employees and guests, and delivered critical services to visitors that choose to travel to Crater Lake. Visitors did travel to the park, and in large numbers as the summer progressed and COVID cases waned. Based on the planning that CLH did to create a pandemic operations plan for COVID, the NPS issued a "Notification of changes in Concession Contract No. CC-CRLA004-18 Related to Crater Lake National Park COV D-19 Adaptive Operations Recovery Plan" which documented the changes to contract language needed to operate as part of the COVID-19 operations plan. CLH management successfully operated under this framework, and safely provided desired visitor service during a challenging time. Thank you for your efforts.</p>	

**United States Department of the Interior - National Park Service**  
**Form 10-ADM - Administrative Compliance Report**

<b>Park</b>	<u>Crater Lake National Park</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality, LLC</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2020</u>
<b>Contract Number</b>	<u>CRLA004-18</u>		

**Instructions:**  
For each element (row), use the drop-down or type in Column F (yellow) to specify if the element is either 1) in compliance ("Yes"), 2) not in compliance ("No"), or 3) not applicable ("N/A") for the concessioner under evaluation. If the element is either not in compliance or not applicable, use the "Remarks" box at the bottom of the form to provide an explanation.

*Notes:*  
- Elements marked with an asterisk (\*) represent "Special Attention Items." See comments at the bottom of the page for more information on how that affects scoring.  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.  
- For 8.B., use the concessioner's due date for their 2019 Annual Financial Report to complete the evaluation. If the 2019 AFR is not available or another year is used for any reason, please indicate the AFR year in the Remarks section below.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Services and Operations</b>	1.1*	All required services were provided by the Concessioner.	Yes	The concessioner provided all required services that were consistent with the modified administrative order issued in response to the COVID-19 pandemic as documented in the notification of changes to CC-CRLA004-18 issued on June 13, 2020 and modified on August 25, 2020.
	1.2*	All services provided by the Concessioner were authorized by the Contract.	Yes	
<b>2. Concessioner Personnel</b>	2.1	The Concessioner established and implemented policies and procedures for pre-employment screening, hiring, training, employment, review of employee conduct, and termination of employees in accordance with the Contract.	Yes	Employee conduct improved over the previous year. No major issues were reported.
	2.2	The Concessioner was in compliance with Applicable Laws relating to employment and employment conditions including those in the Non-Discrimination Exhibit of the Contract.	Yes	
	2.3	The Concessioner developed and implemented appropriate training programs for employees in accordance with the Contract.	Yes	Training is conducted through employee orientations, on-the-job training and SAFE Briefs.
<b>3. Legal, Regulatory and Policy Compliance</b>	3.1	Has the concessioner received a violation(s) of any Applicable Laws? <b>If no, move to Section 4.</b>	No	
		i. Did the Concessioner inform the park superintendent?		
		ii. Did the Concessioner rectify the violation(s) in a timely manner?		
		iii. Was the violation resolved and closure documentation submitted to the park?		
<b>4. Concession Facilities and Government Personal Property</b>	4.1	The Concessioner operated only within the Assigned Land and Concession Facilities as identified in the Contract.	Yes	
	4.2	Government personal property assigned to the Concessioner was maintained in good and operable condition, and properly returned to the NPS for disposition if no longer serviceable.	Yes	The concessioner continued to work with the NPS to identify and return government property they no longer need or are replacing with concessions-owned personal property.
<b>5. Construction or Installation of Real Property Improvement</b>	5.1	Any request for leasehold surrender interest was made in accordance with the requirements of the Contract.	N/A	
	5.2	Is there a Concession Facilities Improvement Program applicable to this rating period? <b>If no, move to Section 6.</b>	Yes	Rehabilitation of Rim Dormitory, Annie Creek Restaurant Improvements, Rim Village Café Building Improvements, Mazama Village Camper Store Improvements
	5.3	The Concessioner submitted plans and specifications for approval by the Superintendent.	No	Rim Dormitory design concepts were presented during this rating period. No progress was made on the balance of the CF P/PPIP projects.
	5.4	The Concessioner started the project on time.	No	Projects were not started on time per contract requirements.
	5.5	The Concessioner completed the project on time.	N/A	Project completion dates were extended in the notification of changes to CC-CRLA004-18 issued on June 13, 2020 due to the COVID-19 pandemic.
	5.6	The Concessioner submitted documentation to confirm that expenditures of the program were in accordance with the Contract.	N/A	



<b>6. Tracking and Payment of Required Fees</b>	6.1*	If a maintenance expense is required, the Concessioner expended the minimum amount required by the Contract during this rating period.	N/A	
	6.2*	The Repair and Maintenance Reserve was spent correctly.	N/A	No RMR spending was requested during 2020.
	6.3*	The Concessioner submitted all required franchise fees and required reports on time, including the monthly franchise fee report.	No	Franchise Fees were not submitted for the period between April 15 (March Payment) and August 15 (July Payment). Franchise Fee payments resumed on August 28, 2020. Park staff understand there may have been discussions about Franchise Fee payment suspension at other organizational levels during this period.
	6.4	If applicable, interest assessed on overdue franchise fee amounts was paid.	Yes	
	6.5	Handicraft sales claimed as exempt from franchise fees were supported by appropriate documentation, e.g. invoices bearing a certification by the supplier that the items were Authentic Native Handicrafts.	Yes	

7. Indemnification and Insurance	7.1*	The Concessioner provided the superintendent with a current Certificate(s) of Insurance.	Yes	Certificates were not provided upon renewal, but were promptly provided when requested.
	7.2*	The Certificate(s) of Insurance documented that the Concessioner was compliant with all insurance coverages required in the Contract. This compliance may be determined through a review by a third party consultant.	Yes	Yes, after several rounds of review and requests for additional information, Northport Affiliates, LLC found the COI complied with the minimum requirements in the contract on 5/15/2020.
8. Accounting Records and Reports	8.1	If this is the first year of a Contract, the opening balance sheet was submitted as required by the Contract.	N/A	
	8.2*	The Concessioner submitted the Annual Financial Report (AFR) due within this rating period.	Yes	
	8.3*	The Concessioner submitted the AFR on time.	Yes	Yes, the 2019 AFR was submitted January 24, 2020, less than 120 days after the end of the concessioner's fiscal year.
	8.4*	The AFR was audited by an independent licensed or certified public accountant, if required.	Yes	
9. Other Reporting Requirements	9.1	The superintendent may require the Concessioner to submit reports and data regarding its performance under the Contract. Some common reporting requirements are listed below.		
		i. Visitor Use Statistics/Operating Reports	Yes	
		ii. Customer Comment Reports	Yes	
		iii. Hours of Operation	Yes	
		iv. Management Listing	Yes	
		v. Inventory of Waste Streams	No	Although required by the contract, an Inventory of Waste Streams was not submitted.
		vi. Employee Handbook	Yes	
vii. Any additional pertinent reports				
10. Assignment, Sale or Encumbrance of Interests	10.1	If the concession was sold or transferred during this rating period, the Concessioner fulfilled all obligations stipulated by the Contract.	N/A	
	10.2	If the name of the business has changed in the past year, give new name below:		
11. Sub-concessions	11.1	If there were any agreements with third parties to provide services authorized or required in the Contract, list the services they provided below:		
	11.2*	All sub-concessions were approved by the superintendent.	N/A	
12. Utilities	12.1	List utility services provided by the NPS for the Concessioner (If there are no utilities provided by the NPS, enter N/A):	water, wastewater, fuel	
	12.2*	The Concessioner paid for the utility services provided in a timely manner.	No	No utility service payments were made between January and May 2020. CLH GM Horner promptly rectified the situation when notified.
	12.3*	If a utility add-on was approved, the Concessioner submitted all required reports, including the distribution of add-ons and reconciliation reports.	N/A	
13. Advertising and Promotional Materials	13.1	The Concessioner obtained NPS approval for all promotional material prior to publication or distribution.	Yes	
	13.2	If the Concessioner used the Concessioner Mark, the Concessioner obtained approval prior to using the Mark and followed the guidelines for using the Mark.	Yes	
	13.3	The Concessioner's websites and social media sites contained accurate and relevant information.	Yes	When errors were noted on the concessioner's website, they were promptly corrected.
14. Contract Transition	14.1	If the Contract was in transition, the Concessioner managed operations appropriately to achieve an orderly transition of operations and avoided disruption of services, including adhering to the provisions stipulated in Exhibit J "Transition to a New Concessioner."	N/A	
15. Other Requirements	15.1	The Concessioner was in compliance with all terms of the contract, not otherwise addressed in the administrative compliance, service or program-specific reviews.	No	CLH continued to have significant issues with their reservation system. Visitors complained of long wait times or the inability to contact a reservation agent. Visitors reported being told the their Access passes are not accepted in the campground. Reservations were not open for one year advanced bookings until July 27.

ADDITIONAL NOTES / COMMENTS

Please see attached narrative.

**Table 2: Scoring**

<b>Scoring</b>				
<b>Program Area</b>	<b>Score (%)</b>	<b>Program Area</b>	<b>Score (%)</b>	
1. Services and Operations	100.0%	9. Other Reporting Requirements	83.3%	
2. Concessioner Personnel	100.0%	10. Assignment, Sale or Encumbrance of Interests	n/a	
3. Legal, Regulatory and Policy Compliance	n/a	11. Special Provisions – Sub-concessions	n/a	
4. Concession Facilities and Government Personal Property	100.0%	12. Special Provisions – Utilities	0.0%	
5. Construction or Installation of Real Property Improvement	0.0%	13. Advertising and Promotional Materials	100.0%	
6. Tracking and Payment of Required Fees	66.7%	14. Contract Transition	n/a	
7. Indemnification and Insurance	100.0%	15. Other Requirements	0.0%	
8. Accounting Records and Reports	100.0%			
<b>Total - All Program Areas</b>				
<b># In Compliance (Yes)</b>	<b># Deficient (No)</b>	<b># Deficient (Special Attention Item)</b>	<b># N/A</b>	<b># Applicable Requirements</b>
<b>22</b>	<b>6</b>	<b>2</b>	<b>13</b>	<b>28</b>
<b>Administrative Compliance Score</b>		<b>78.6</b>		Superior = 90 – 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = ≤49
<b>Adjusted Administrative Compliance Score</b>		<b>69.0</b>		
<b>Rating</b>		<b>Marginal</b>		
<i>Notes:</i> 1) If 1-2 Special Attention Items are not in compliance, the Administrative Compliance Score is adjusted to Marginal and capped at 69. 2) If 3+ Special Attention Items are not in compliance, the Administrative Compliance Score is adjusted to Unsatisfactory and capped at 49.				

**United States Department of the Interior - National Park Service**  
**Form 10-OPR - Concession Operational Performance Report**

<b>Park</b>	<u>Crater Lake National Park</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality, LLC</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2020</u>
<b>Contract Number</b>	<u>CRLA004-18</u>		

**Instructions**  
Fill in the (yellow) highlighted cells in the table below with the following information:  
**Location** – List the concession location/facility being evaluated. **(Note Location MUST be filled out in order to activate the scoring on this form.)**  
**Service Type** - List the service type being evaluated (Note: If a single location/facility has multiple service types, the facility should receive multiple rows in the table, one for each service type).  
**Weighting** - Add a weighting value based on the importance of the service to the park: 1 = low importance, 2 = medium importance, or 3 = high importance. **(Note Weighting MUST be filled out in order for the form to work properly. If the user wishes to have all locations/services have equal weights, simply select the same weighting for each.)**  
**Periodic Evaluation (PE) Score(s)** – For each location/service type, enter the score (1-5) the concessioner achieved in PEs performed during the evaluation year. (Note: If multiple PEs were performed during the year, enter them in columns F, G and H).  
  
If you require more than the 20 rows in Table 1, click the "+" button on the left side of this worksheet (near row 141) to add additional rows.  
If you require more than 120 rows in Table 1, please contact [cs\\_cm\\_helpdesk@nps.gov](mailto:cs_cm_helpdesk@nps.gov) for a new version of the AOR Workbook.  
If you have completed more than four PE's during a given year, please contact [cs\\_cm\\_helpdesk@nps.gov](mailto:cs_cm_helpdesk@nps.gov) for a revised 10-OPR form with additional columns.  
  
**Notes:**  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

<b>If no periodic evaluations were completed for this Contract during this rating period, enter "X" in the box on the right.</b>	
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**Note** If no periodic evaluations were completed, please explain why in the "Comments" box below.

**Table 1 Facility Evaluation**

**Hints:**  
- To delete unnecessary/extra rows from the table below, select the desired rows to delete and hold **Ctrl + Shift + D** on your keyboard.  
- DO NOT insert individual rows into the table below.

Location / Facility	Service Type	Weighting	Periodic Evaluation Score(s)					Weighted Score
			PE #1	PE #2 (if app)	PE #3 (if app)	PE #4 (if app)	Average PE Score	
Annie Creek Gift Shop	Retail	2 - Medium	3				3.0	6.0
Annie Creek Restaurant - Facility	Food and Beverage – Fast Casual Dining	3 - High	3				3.0	9.0
Annie Creek Restaurant - Dining	Food and Beverage – Fast Casual Dining	3 - High	5				5.0	15.0
Mazama Cabins	Lodging – Basic	3 - High	3				3.0	9.0
Mazama Camper Store	Retail	2 - Medium	4				4.0	8.0
Mazama Service Station	Automobile Services	2 - Medium	4				4.0	8.0
Mazama Campground	Campgrounds	3 - High	3				3.0	9.0
Mazama Dorms & Warehouse	Employee Housing	2 - Medium	3				3.0	6.0
Crater Lake Lodge	Lodging – Midscale	3 - High	3				3.0	9.0
Lodge Restaurant - Facility	Food and Beverage – Upscale Casual Dining	3 - High	3				3.0	9.0
Lodge Restaurant - Dining	Food and Beverage – Upscale Casual Dining	3 - High	5				5.0	15.0
Lodge EDR	Employee Dining Rooms	2 - Medium	5				5.0	10.0
Rim Dorm	Employee Housing	2 - Medium	3				3.0	6.0
Rim Café - Facility	Food and Beverage – Quick Service	3 - High	3				3.0	9.0
Rim Gift Shop	Retail	2 - Medium	4				4.0	8.0
Rim Café - Dining	Food and Beverage – Quick Service	3 - High	4				4.0	12.0

**Use the space below to justify/explain the weighting system adopted in the table above.**  
The park weighted services such as food, accommodations, or interpretation for visitors as the highest priority. Medium weight services were those that the park deemed as less important to the basic needs of visitors or to their ability to connect with the park. The park also rated employee amenity services, such as housing and dining, as medium weight. There are no low weight services, as all services contribute directly towards the visitor experience or employee satisfaction in the park.

**Table 2 Scoring**

**Scoring**

**OPTIONAL** - If you would like to see the operational performance broken by service type, insert all service types evaluated at the concessioner below in the highlighted cells (from 2nd column in table above - only list each service type once)

Service Type	Average Weighted Score
Automobile Services	4.0
Campgrounds	3.0
Employee Dining Rooms	5.0
Employee Housing	3.0
Food and Beverage – Fast Casual Dining	4.0
Food and Beverage – Quick Service	3.5
Food and Beverage – Upscale Casual Dining	4.0
Lodging – Basic	3.0
Lodging – Midscale	3.0
Retail	3.7

Operational Performance  
Score  
  
Rating

<b>72.2</b>
<b>Satisfactory</b>

Superior = 90 – 100  
Satisfactory = 70 – 89  
Marginal = 50 – 69  
Unsatisfactory = ≤49

**ADDITIONAL NOTES / COMMENTS**

Please see attached narrative.

**United States Department of the Interior - National Park Service**  
**Form 10-PHP - Public Health Program Evaluation Report**

<b>Park</b>	<u>Crater Lake National Park</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality, LLC</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2020</u>
<b>Contract Number</b>	<u>CRLA004-18</u>		

**Instructions:**  
 Facility Information: All facilities may not be inspected during the course of the year, however, it will be important to provide documentation on the facility information section to maintain accurate records. Food service operation types include restaurants/cafeterias, snack bars, grocery, pre-packaged, backcountry, vending, temporary, mobile, and other.

Inspection Information – Transfer the number of Satisfactory, Marginal, and Unsatisfactory (S, M, U) ratings from the Food Service Sanitation Inspection Report to this section. Calculations for the final score will automatically be made if using the form electronically. Just enter the number of Satisfactory inspections, number of Marginal Inspections, and number of Unsatisfactory Inspections. If the form is being completed manually, multiply the number of inspections in each category (S, M, U) by the following points: Satisfactory = 100, Marginal = 50, Unsatisfactory = 0. Total the number of inspections and the number of points and then, divide the total number of points by the total number of inspections for the final score.

*Notes:*  
 - For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
 - To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Facility Information**

FACILITY INFORMATION			
Facility Type	Number of Facilities	Facility Name(s)	Comments / Notes / Remarks
Restaurants/Cafeteria	3	Lodge EDR, Lodge Restaurant, Annie Creek Restaurant	
Snack Bars	1	Rim Café	
Grocery	1	Mazama Camper Store	
Pre-Packaged			
Bar			
Backcountry			
Temporary (Identify)			
Vending			
Mobile			
Other1	1	Warehouse	
Other2			
<b>Total Number of Facilities:</b>	<b>6</b>		

ADDITIONAL NOTES / COMMENTS
Please see attached narrative.

**Table 2: Inspection Information**

INSPECTION INFORMATION		
<b>Instructions:</b> Fill in the yellow cells below with the number of Public Health inspections that achieved the corresponding rating (e.g. for the first box, enter the number of inspections where the concessioner achieved a "Satisfactory" rating).		
	# Inspections	Points
# Satisfactory	6	600
# Marginal		
# Unsatisfactory		
<b>Total</b>	<b>6</b>	<b>600</b>

<b>Public Health Score</b>	<b>100.0</b>	Satisfactory = 85 – 100* Marginal = 50 – 84 Unsatisfactory = ≤ 49
<b>Adjusted Public Health Score</b>	<b>100.0</b>	
<b>Rating</b>	<b>Satisfactory</b>	

*Note: If concessioner received one or more Unsatisfactory inspections, the final public health rating cannot exceed Marginal and the score cannot exceed 84.*

**United States Department of the Interior - National Park Service**  
**Form 10-RMP - Risk Management Program Evaluation Report**

<b>Park:</b> <u>Crater Lake National Park</u> <b>Concessioner Name:</b> <u>Aramark</u> <b>Contract Number:</b> <u>CRLA004-18</u>	<b>Concessioner DBA:</b> <u>Crater Lake Hospitality, LLC</u> <b>Year of Operation:</b> <u>2020</u>
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**Instructions:**  
The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

*Notes:*  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Program Area Evaluations**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Risk Management Program (RMP) Scope</b>	1.1	The RMP is documented, and its scope covers the ten risk management elements. Furthermore, the RMP scope addresses the risk management objectives and aspects applicable to the operation, including: <ul style="list-style-type: none"> <li>• legal requirements (Applicable Laws), contract requirements (including requirements contained in Exhibits), and safety best management practices</li> <li>• employee and visitor hazards</li> <li>• operational, facility and natural hazards</li> </ul>	No	The RMP is documented, however, does not cover the scope of operations nor the potential health and safety hazards present in CLH operations at Crater Lake. The plan emphasizes the use of vessels and busses but makes no mention of managing risk in employee housing, visitor lodging, food and beverage facilities, fuel dispensing facilities, etc.
	1.2	The RMP establishes a safety policy for the organization. The policy indicates commitment to: <ul style="list-style-type: none"> <li>• compliance with Applicable Laws</li> <li>• providing a safe and healthful environment for employees, park staff and visitors to the extent possible</li> <li>• assigning responsibilities</li> <li>• providing staff and resources</li> <li>• monitoring performance</li> </ul>	Yes	The RMP does establish a safety policy for the organization.
<b>2. Responsibility and Accountability</b>	2.1	The concessioner identifies a safety and health official, and documents this assignment in the RMP.	Yes	The CLH General Manager is designated as the safety and health official.
	2.2	The concessioner identifies the risk management organizational and staff responsibilities, and documents this structure and assignments in the RMP.	No	The RMP outlines basic responsibilities for the safety and health official (GM) but does not specify additional roles. The appendices outline responsibilities in relation to specific procedures (hazard reporting, safety briefings, etc.) There are corporate procedures that were not fully implemented on-site. These procedures require assigning program responsibility (Safety Officer, Hazard Communication Program Administrator, etc.) These assignments did not occur.
	2.3	RMP resources are developed, documented in the RMP, and applied; resources are adequate to execute the program. Resources include: <ul style="list-style-type: none"> <li>• personnel (e.g., number of staff, experience and skills)</li> <li>• facilities and equipment</li> <li>• information, documentation, and data management systems</li> <li>• agreements for support from outside contractors and agencies</li> <li>• training programs for concession personnel</li> </ul>	Yes	Improvements are still needed in this area for the overall RMP. However, it is worth noting that significant efforts were invested in resources related to pandemic response and evacuation planning. These plans were well developed, documented, communicated and applied.
<b>3. Training</b>	3.1	Managers and staff with safety and health responsibilities meet the qualification requirements defined in the contract and RMP. Competency requirements are defined by appropriate education, training, and experience.	Yes	Yes, during this rating period staff with safety and health responsibilities met the qualification requirements.
	3.2	A training plan is developed, documented in the RMP, and executed; and includes: <ul style="list-style-type: none"> <li>• Defined training requirements for the safety officer and other personnel, including requirements to meet Applicable Laws, the contract, and the RMP.</li> <li>• Required training records, such as training materials, schedules, and participant records.</li> </ul>	Yes	The corporate training plan was developed and executed this rating period. However, the RMP does not document many operation-specific or contract required training requirements (e.g., Serve Safe for kitchen staff, chemical safety for housekeeping, equipment training for maintenance, defensive driving for shuttle drivers, etc.)
	3.3	The concessioner has conducted and documented all training.	Yes	The concessioner did provide evidence of training this rating period.

4. Documentation and Operational Controls	4.1	RMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws, the contract, and the RMP to ensure safe operations. Some plans and procedures may overlap with those in the EMP. Examples of operating procedures include: <ul style="list-style-type: none"> <li>• procedures for the safe storage and handling of chemicals</li> <li>• procedures for embarking and disembarking visitors</li> <li>• procedures for safe equipment use</li> <li>• procedures for managing wildlife interactions</li> <li>• procedures for cancelling operations due to weather</li> </ul>	No	Progress has been made on this requirement, however, some standard operating procedures are outstanding or plans that have been developed are not referenced in the RMP.
	4.2	RMP emergency plans and procedures are developed, documented (if applicable), implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws, the contract, and the RMP. Some plans and procedures may overlap with those in the EMP. Emergencies to be addressed include: <ul style="list-style-type: none"> <li>• natural disasters (earthquakes, floods, tornados, hurricanes, etc.)</li> <li>• motor vehicle incidents</li> <li>• medical emergencies (visitors and employees)</li> <li>• fire (structural, motor vehicles, wildfires, etc.)</li> <li>• terrorism and law enforcement activities</li> <li>• accidents and fatalities (visitors and employees within park boundaries)</li> </ul>	Yes	A detailed Emergency Action and Emergency Response Plan was submitted with the RMP in 2019 but has not since been updated. There are a number of updates and corrections needed in this plan. It appears some training in emergency procedures has occurred as CLH staff have been noted to follow established emergency procedures for emergency incidents and alarm activations.
5. Communications	5.1	The RMP is available to staff and communicated throughout the concession organization so that personnel understand and can effectively implement the RMP.	No	While CLH has implemented several elements of a risk management program including orientation training and SAFE Briefs, SAFE Observations, and required OSHA postings, there does not seem to be any efforts made to implement the Risk Management Program as described in the submitted Risk Management Plan. Managers did not seem to have knowledge of what was included in the document itself and there was no comprehensive Hazards Communications program in place.
	5.2	The RMP addresses procedures for communicating hazards to visitors. The hazards may include: <ul style="list-style-type: none"> <li>• Activity-related hazards (e.g., white water rafting)</li> <li>• Natural resource-related hazards (e.g., bears)</li> <li>• Facility-related hazards and procedures (e.g., property evacuation maps)</li> </ul>	Yes	While there is limited information in the RMP about communicating hazards to visitors, procedures are being implemented including informing visitors of basic information when checking in for lodging, camping, or renting snowshoes. Evacuation maps are posted in all facilities and lodging rooms.
	5.3	Any visitor acknowledgment of risk is approved by the park. Waivers of liability are not used.	Yes	A VAR is in use for snowshoe rentals only.
	5.4	The concessioner's risk emergency plans are coordinated and agreements in place with other applicable parties such as the NPS, other federal, state, or local emergency response agencies.	Yes	Coordination with NPS improved significantly during this rating period. The concessioner closely coordinated with NPS staff in developing a pandemic response plan. CLH also developed an evacuation plan in response to the 2020 wildfire season.
6. Reporting	6.1*	All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided to the NPS in accordance with the contract. Additional plans, reports, and other documentation are submitted to the NPS in accordance with the contract and RMP.	Yes	All documentation known to be required was submitted on time and in accordance with applicable laws. When CLH was made aware of a delinquency of Community Right to Know required reporting GM Horner addressed the issues immediately. Note this is an annual reporting requirement that should be added to the RMP so that it occurs regardless of staff turnover.
	6.2*	Imminent danger and serious incidents are reported to the park in a timely manner in accordance with the contract and RMP.	Yes	All imminent danger issues were reported to the park in a timely manner. No serious incidents were known to have occurred.
	6.3	Annual reports include internal, park, and other regulatory agency risk data, and are submitted to the NPS in accordance with the contract and RMP.	Yes	There are no defined annual reporting requirements related to the risk management program in the contract. All other known reports were made.
7. Inspections and Corrective Action	7.1	Safety inspections are conducted as specified in the contract and RMP or as otherwise necessary to effectively manage operations safely. Formal and routine inspections are scheduled, conducted, and documented. The inspections are conducted by qualified personnel as described in the RMP.	Yes	Required building, system and equipment inspections were completed prior to facility openings and reports were provided to the NPS. CLH reports that SAFE Observations were completed by staff.
	7.2*	Imminent danger, serious, and non-serious hazard deficiencies identified by internal or external inspections are analyzed, corrected, or mitigated within the contract or RMP required timeframes. Any deviations from these timeframes are accepted by the park and documented.	Yes	



<b>8. Hazard Incident Investigations and Abatement</b>	8.1*	Accidents/incidents are responded to in a timely and effective manner.	Yes	
	8.2	An investigation is conducted for every accident/incident. <ul style="list-style-type: none"> <li>• The investigation includes an analysis to determine the cause.</li> <li>• Corrective action is taken to mitigate recurrences of the accident/incident.</li> </ul>	Yes	Aramark has SAFE Investigation standards to be used after an accident or incident. All incidents that the NPS was made aware of were discussed with the concessioner to ensure follow up and corrective action.
<b>9. Management Review</b>	9.1*	The RMP is reviewed at least annually, and updated as necessary. <ul style="list-style-type: none"> <li>• The RMP review includes analysis of performance in each RMP element area to determine any systemic program failures (particularly failures that resulted in fatal or serious accidents/incidents or imminent danger hazard deficiencies) and non-compliance with Applicable Laws.</li> <li>• Systemic problems are addressed in RMP updates.</li> </ul>	Yes	An updated RMP was submitted on 4/24/20. While improvements have been made and additional plans developed, additional updates are required. Please see the narrative for a summary.
	9.2	The initial RMP is submitted to the park within the contract specified timeframe for review, and is accepted by the park. Any subsequent documented RMP updates are submitted to the park for review and acceptance.	No	The park has not yet accepted the RMP. However, the concessioner has been address concerns.
<b>10. Other Contract Requirements</b>	10.1	Contract-specific safety and health requirements not otherwise addressed in the RMP standards are met.	No	There are a number of outstanding requirements related to structural fire protection, including developing a Fire Prevention Plan, registering for the Federal fire-safe list, etc.

\*Special Attention Item

ADDITIONAL NOTES / COMMENTS	
Please see attached narrative.	

**Table 2: Scoring**

<b>Scoring</b>			
Program Area	Score (%)	Program Area	Score (%)
1. Risk Management Program (RMP) Scope	50.0%	7. Inspections and Corrective Action	100.0%
2. Responsibility and Accountability	66.7%	8. Hazard Incident Investigations and Abatement	100.0%
3. Training	100.0%	9. Management Review	50.0%
4. Documentation and Operational Controls	50.0%	10. Other Contract Requirements	0.0%
5. Communications	75.0%		
6. Reporting	100.0%		

**Total - All Program Areas**

# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Item)	# N/A	# Applicable Reqs.
18	6	0	0	24

<b>Risk Management Score</b>	<b>75.0</b>	Superior = 90 – 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = ≤49
<b>Adjusted Risk Management Score</b>	<b>75.0</b>	
<b>Rating</b>	<b>Satisfactory</b>	

*Notes:*

- If 1-2 Special Attention Items are not in compliance, the Risk Management Score is adjusted to Marginal and capped at 69.
- If 3+ Special Attention Items are not in compliance, the Risk Management Score is adjusted to Unsatisfactory and capped at 49.

**United States Department of the Interior - National Park Service**  
**Form 10-EMP - Environmental Management Program Evaluation Report**

<b>Park</b>	<u>Crater Lake National Park</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality, LLC</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2020</u>
<b>Contract Number</b>	<u>CRLA004-18</u>		

**Instructions:**

The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

**Notes:**

- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Environmental Management Program (EMP) Scope</b>	1.1	The concessioner's EMP scope (whether documented or undocumented) covers the environmental objectives and environmental management aspects applicable to the operation including: <ul style="list-style-type: none"> <li>• legal requirements (Applicable Laws), contract requirements (including requirements contained in Exhibits), and environmental best management practices</li> <li>• facilities and operations</li> <li>• natural and cultural resources</li> </ul>	Yes	CLH submitted their Environmental Management Program Plan in 2019 and provided some additional EMP documentation on 1/9/2020. Not updates have been provided since. The EMPP makes reference to the contractually required elements (Policy, Goals and Targets, Responsibilities and Accountability, Documentation, Documentation Control and Information Management System, Reporting, Communication, Training, Monitoring, Measurement, and Corrective Action) but does not account for all activities with potential environmental impacts, nor were specifics provided. References are made to meeting legal requirements, contract requirements, and environmental BMPs, but no specific plans or strategies are outlined or have been submitted to the park. The plan provides guidance for how an Environmental Management Program should be developed and enacted. Although the plan has not been followed through on, the framework seems to be in place.
	1.2**	The EMP is documented.	Yes	Although none of the action items or strategies for achieving environmental objectives have been implemented on site, Aramark has documented an Environmental Management Program Plan.
	1.3**	The EMP establishes the concessioner's environmental policy. The policy indicates commitment to: <ul style="list-style-type: none"> <li>• compliance with Applicable Laws</li> <li>• protecting and conserving park resources and human health</li> <li>• assigning responsibilities</li> <li>• providing staff and resources</li> <li>• monitoring performance</li> </ul>	Yes	The EMPP states that Aramark will develop an Environmental Policy that will be signed by the general manager and will serve as the foundation for all environmental activities. No official policy has been articulated, but the EMPP does describe how the concessioner should assign responsibilities, comply with Applicable Laws, monitor performance, etc. None of these actions are documented to have taken place on site, but the framework seems to be in place.
<b>2. Responsibility and Accountability</b>	2.1**	The concessioner must identify an environmental officer and/or program manager and document this assignment in the EMP. The environmental officer must meet the contract specified qualifications and requirements defined in the documented EMP.	No	The EMPP lists a number of roles and responsibilities but none of the roles or responsibilities were actually assigned to individuals in 2020. No specific qualifications are noted in the EMP other than general references to legal and other requirements.
	2.2	The concessioner determines management and staff responsibilities as necessary to effectively manage environmental activities, and describes this structure and these assignments in the documented EMP (if applicable).	No	The EMPP lists a number of roles and responsibilities for members of the Environmental Management System Team, but these roles have not actually been assigned. The EMPP does not reference the role of general staff or contractors.
	2.3	EMP resources are developed, documented in the EMP (if applicable), and applied; resources are adequate to execute the program. Resources include: <ul style="list-style-type: none"> <li>• personnel (e.g., number of staff, experience and skills)</li> <li>• facilities and equipment</li> <li>• information, documentation, and data management systems</li> <li>• agreements for support from outside contractors and agencies</li> <li>• training programs for concession personnel</li> </ul>	No	EMP resources were not developed or applied. On-site personnel did not seem to be aware of the Environmental Management System requirements or objectives. No data was collected in support of the EMP or its objectives. There is no evidence that training was conducted with staff other than what was required to operate the Mazama fuel station or some environmental topics covered in orientations or SAFE briefs.
<b>3. Training</b>	3.1	Managers and staff with environmental management responsibilities meet qualification requirements defined in the contract and documented EMP (if applicable). Competency requirements are defined by appropriate education, training, and experience.	Yes	Managers and staff now meet minimum training requirements for managing UST's and spill response.
	3.2	A training plan is developed, documented in the EMP (if applicable), and executed; and includes: <ul style="list-style-type: none"> <li>• Defined training requirements for the environmental officer and other personnel, including requirements to meet Applicable Laws, the contract, and the EMP.</li> <li>• Required training records, such as training materials, schedules, and participant records.</li> </ul>	No	CLH did provide a compliance obligations list that specified training requirements, however this was never implemented as a plan.

	3.3	The concessioner has conducted and documented all training.	No	No documentation of EMS training was provided.
4. Documentation and Operational Controls	4.1	EMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the documented EMP (if applicable). These procedures address requirements in Applicable Laws, the contract, and the EMP to ensure protection of human health and the environment. Some plans and procedures may overlap with those in the RMP. Examples of operating procedures include: <ul style="list-style-type: none"> <li>• procedures for the storage and handling of chemicals</li> <li>• procedures for the management and maintenance of fuel</li> <li>• procedures for pesticide use</li> <li>• procedures for hazardous and solid waste disposal</li> <li>• procedures for weed and pest management</li> <li>• procedures for the protection of cultural and archeological resources</li> </ul>	Yes	SOP's have now been provided related to chemical handling and fuel management, however these are not incorporated into the EMP.
	4.2	EMP emergency plans and procedures for environmental management are developed, documented (if applicable), implemented, maintained, and included or referenced in the documented EMP (if applicable). These plans and procedures address requirements in Applicable Laws, the contract, and the EMP. Some plans and procedures may overlap with those in the RMP. Emergencies to be addressed include: <ul style="list-style-type: none"> <li>• hazardous substance spill response</li> <li>• leaks from fuel storage tanks or other chemical storage areas</li> <li>• storm water contamination</li> </ul>		
5. Communications	5.1	The EMP is available to staff (if applicable), and communicated throughout the concession organization so that personnel understand and can effectively implement the EMP.	No	
	5.2	The EMP addresses procedures for communicating environmental controls and initiatives to visitors. These may include: <ul style="list-style-type: none"> <li>• Handling hazardous materials (e.g., fuel)</li> <li>• Handling waste (e.g., trash)</li> <li>• Natural resource or cultural resource impacts</li> <li>• Pest management (e.g., notification of pests if observed)</li> </ul>	Yes	The EMP describes how the Communication Specialist is responsible for ensuring information is shared with external stakeholders. There is no Communication Specialist, but some information has been shared with lodging visitors through the use of registration cards (wildlife encounters) and room placards (water conservation). The CLH website also lists several sustainability initiatives that are described in the contract, but many of these have not been implemented yet.
	5.3	The concessioner's environmental emergency plans are coordinated and agreements in place with other applicable parties such as the NPS, other federal, state, or local environmental agencies.	Yes	The NPS is the primary response agency.
6. Reporting	6.1*	All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided to the NPS in accordance with the contract. Additional plans, reports, and other documentation are submitted to the NPS in accordance with the contract and documented EMP (if applicable). These may include inventories of hazardous substance and waste streams.	Yes	
	6.2*	Notices of any discharges, release or threatened release of hazardous or toxic substance, material or waste are reported in a timely manner to the NPS in accordance with the contract.	N/A	None were reported.
	6.3*	Any written, threatened or actual notices of violation of Applicable Law from any environmental regulatory agency are reported in a timely manner to the NPS in accordance with the contract.	N/A	None were reported.
	6.4	The NPS is provided timely written advance notice of, and the opportunity to participate in, communications with regulatory agencies regarding the concessioner's environmental activities in accordance with the concession contract.	N/A	The NPS was not aware of communications with regulatory agencies regarding environmental activities that would have required NPS involvement.

<b>7. Monitoring, Measurement and Corrective Action</b>	7.1	Environmental inspections are completed as required by Applicable Law, the contract, the documented EMP (if applicable), or as otherwise necessary to effectively manage environmental activities.	No	The EMP states that an internal conformance audit, environmental compliance audit, and a management review meeting will take place every year. None of these were reported to have been completed in 2020.
	7.2*	Environmental deficiencies identified by internal or external inspections (e.g., NPS concession environmental audits, etc.) are analyzed, corrected, or mitigated within the timeframes designated by Applicable Law, the contract, documented EMP (if applicable), or inspection report. Any deviations from these timeframes are accepted by the park and documented.	Yes	No formal audits were conducted this year, but several deficiencies noted informally or through Periodic Evaluations did receive follow-up.
	7.3	Environmental incidents are responded to in a timely and effective manner to stop, contain, and remediate the incident. Investigations are conducted, and corrective actions are taken to prevent recurrences to the satisfaction of the NPS in accordance with the contract, EMP, and relevant regulations and NPS policies.	N/A	There were no environmental incidents reported.
	7.4***	The EMP is reviewed at least annually, and updated as necessary. • The EMP review includes analysis of performance in each EMP element area to determine any systemic program failures (particularly failures that resulted in serious incidents of inspection deficiencies), and non-compliance with Applicable Laws. • Systemic problems are addressed in EMP updates.	No	No EMP review was conducted in 2020.
	7.5**	The initial EMP is submitted to the park within the contract specified timeframe for review, and is accepted by the park. Any subsequent documented EMP updates are submitted to the park for review and acceptance.	N/A	No updates were submitted.
<b>8. Other Contract Requirements</b>	8.1	Contract-specific environmental requirements not otherwise addressed in the EMP standards are met.	No	The contract lists several environmental requirements and reports that are required including:  Zero Landfill Program* Solid Waste Audit with reduction by 75% in first year* Waste Stream Report Water Conservation Management Plan Water Savings Calculator used in kitchen operations Water Use Audit Computer-based Water Tracking System installed property-wide Annual Water Conservation Report Greenhouse Gas Emissions Report  Progress has not been made on these initiatives.  * NPS staff discussed flexibilities as a result of changing recycling markets.

\* indicates a Special Attention Item

\*\* indicates item is not applicable to Cat III contracts

**ADDITIONAL NOTES / COMMENTS**

Please see attached narrative.

**Table 2: Scoring**

<b>Scoring</b>			
Program Area	Score (%)	Program Area	Score (%)
1. Environmental Management Program (EMP) Scope	100.0%	6. Reporting	100 0%
2. Responsibility and Accountability	0.0%	7. Monitoring, Measurement and Corrective Action	33.3%
3. Training	33 3%	8. Other Contract Requirements	0.0%
4. Documentation and Operational Controls	100.0%		
5. Communications	66.7%		

**Total - All Program Areas**

# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Item)	# N/A	# Applicable Reqs.
9	9	1	5	18

<b>Environmental Management Score</b>	<b>50.0</b>	Superior - 90 - 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = ≤49
<b>Adjusted Environmental Management Score</b>	<b>50.0</b>	
<b>Rating</b>	<b>Marginal</b>	

*Notes:*  
 - If 1-2 Special Attention Items are not in compliance, the Environmental Management Score is adjusted to Marginal and capped at 69.  
 - If 3+ Special Attention Items are not in compliance, the Environmental Management Score is adjusted to Unsatisfactory and capped at 49.

**United States Department of the Interior - National Park Service**  
**Form 10-AMP - Asset Management Program Evaluation Report**

<b>Park:</b> <u>Crater Lake National Park</u>	<b>Concessioner DBA:</b> <u>Crater Lake Hospitality, LLC</u>
<b>Concessioner Name:</b> <u>Aramark</u>	<b>Year of Operation:</b> <u>2020</u>
<b>Contract Number:</b> <u>CRLA004-18</u>	

**Instructions**  
The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

**Notes:**  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the Instructions and TOC tab.  
- To use Spell Check, hold Ctrl + Shift + S on your keyboard.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Annual Concessioner Maintenance Plan (ACMP)</b>	1.1	The ACMP is updated annually and submitted on time.	No	No ACMP was submitted during the rating period.
	1.2	The ACMP is accurate and complete	N/A	
	1.3	Projected maintenance expenditures are provided.	N/A	
<b>2. Inspections</b>	2.1	Inspections were performed on schedule.	Yes	Daily system checks were being conducted and ensured that problems were noticed and addressed before they resulted in serious failures. Critical system inspections were performed by vendors prior to facility openings.
	2.2	Inspection findings were addressed in a timely manner.	Yes	
	2.3	Periodic evaluation facility findings were addressed in a timely manner.	Yes	
<b>3. Maintenance</b>	Facility maintenance was performed as scheduled in a timely manner:			
	3.1*	Preventative Maintenance	Yes	Concessioner completed preventative maintenance tasks including cleaning and maintaining floors, servicing equipment, changing filters, replacing batteries, etc.
	3.2*	Recurring Maintenance	Yes	
	3.3	Scheduled Repairs	N/A	
	3.4	Unscheduled Repairs	Yes	
	3.5*	Component Renewal/Replacement	N/A	
<b>4. Reporting</b>	Accurate and complete reports were submitted on time, in the correct format:			
	4.1	Annual Concessioner Maintenance Report	Yes	An annual concessions maintenance report was submitted prior to the January 15 deadline.
	4.2	Concessioner Project Plan and Report	No	
	4.3	Fixture Replacement Report	N/A	Not required / waiver in place.
	4.4	Component Renewal Report	N/A	No component renewal projects were undertaken.
	4.5	Personal Property Report	No	Due February 15, not provided.
<b>5. Computerized Maintenance Systems (CMMS)</b>	5.1	CMMS is maintained and current.	No	While CLH reports that CMMS development is underway, no system has yet been brought online.
	5.2	All maintenance actions and associated expenditures requested by the Service were provided in the correct electronic format.	No	No electronic work orders were submitted. Note that when the CMMS is brought online there will be a backlog of electronic data required to update the electronic facility records.
<b>6. Other Contract Requirements</b>	6.1	Contract-specific facility maintenance requirements, not otherwise addressed in the AMP standards, are met.	Yes	

\* indicates a Special Attention Item

ADDITIONAL NOTES / COMMENTS
Please see attached narrative.

Table 4: Scoring

Scoring				
Program Area	Score (%)	Program Area	Score (%)	
1. Annual Concessioner Maintenance Plan (ACMP)	0.0%	5. Computerized Maintenance Systems (CMMS)	0.0%	
2. Inspections	100.0%	6. Other Contract Requirements	100.0%	
3. Maintenance	100.0%			
4. Reporting	33.3%			
<b>Total - All Program Areas</b>				
# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Items)	# N/A	# Applicable Reqs.
8	5	0	7	13
<b>Asset Management Score</b>	<b>61.5</b>	Superior 90 – 100 Satisfactory 70 – 89 Marginal 50 – 69 Unsatisfactory ≤49		
<b>Adjusted Asset Management Score</b>	<b>61.5</b>			
<b>Rating</b>	<b>Marginal</b>			
<i>Notes:</i> - If 1-2 Special Attention Items are not in compliance, the Asset Management Score is adjusted to Marginal and capped at 69. - If 3+ Special Attention Items are not in compliance, the Asset Management Score is adjusted to Unsatisfactory and capped at 49.				



**UNITED STATES DEPARTMENT OF THE INTERIOR – NATIONAL PARK SERVICE  
Crater Lake National Park  
Aramark d/b/a Crater Lake Hospitality**

**CC-CRLA004-18  
2020 Annual Overall Rating Narratives**

**CFIP/Construction/Repair and Maintenance Reserve or Rehab Projects**

There were several CFIP projects scheduled to begin in 2019 per the contract, including the Rehabilitation of Rim Dormitory, Annie Creek Restaurant Improvements, Rim Village Café Building Improvements, and Mazama Village Camper Store Improvements.

The Rim Village Café project was partially completed in April 2019, as the retail cash wrap was moved and large-scale images were added to the stairwell walls to encourage visitor use of the second floor. During this rating period preliminary planning began on the rehabilitation of Rim Dormitory. However, the balance of the other projects have not begun. While the contract required the PPIP projects to be completed in May 2020 and real property improvements by March 31, 2021, due to the COVID-19 pandemic these deadlines were extended to June 2021 and March 31, 2022, respectively.

No Repair and Maintenance Reserve or Rehab Projects were undertaken in 2020. However, planning did begin for the Crater Lake Lodge Roof Replacement.

**Leasehold Surrender Interest/Possessory Interest**

No LSI was incurred during the 2020 operating period.

**Franchise Fees**

Crater Lake Hospitality did not make Franchise Fee payments between April 15, 2020 and August 15, 2020. Payments resumed on August 28, 2020 and the remainder of payments in 2020 were made within the month they were due, though the September 2020 payment was 5 days late. The contract required franchise fees to be paid by ACH or wire transfer. The NPS revised their procedures and are no longer issuing a Bill of Collection for Franchise Fee payments, so payments can be made once the Franchise Fee reconciliation is completed by Aramark accounting staff.

## **AFR**

The 2019 AFR was submitted January 24, 2020, within the 120 days of the close of the concessioner's fiscal year. The report was audited by an independent Certified Public Accountant in accordance with Generally Accepted Auditing Standards.

## **Insurance**

An independent contractor, Northport Affiliates LLC., reviewed Crater Lake Hospitality's insurance documents and found the Certificate of Insurance complies with the minimum insurance requirements stipulated in the contract. This review was completed on May 15, 2020.

## **Risk Management**

Crater Lake Hospitality submitted an updated Risk Management Plan on April 24, 2020. This appears to be the same plan that was submitted in 2019, with minor edits to correct the obvious inaccuracies including references to other properties, jurisdictions, and activities that don't apply to CRLA (they're still listed with "as applicable" included). As noted in the 2019 AOR, this plan does not fully address the scope of the operations at Crater Lake. According to the NPS Commercial Services Guide, the RMP must be appropriate to the nature and size of the operation and must account for the potential health and safety effects of all activities conducted by the concessioner or to which the concessioner contributes. The plan emphasizes the use of vessels and busses but makes no mention of managing risk in the vast array of other concessioner functions such as employee housing, visitor lodging, food and beverage facilities, fuel dispensing facilities, equipment operation, etc., all of which are a part of CLH's operations at CRLA. Feedback on improving the plan was provided but not followed up on.

An issue last year was that while CLH reported that they are providing training, training requirements and proof of training were not documented in the plan or elsewhere. During this rating period, CLH did make an effort to ensure risk management training was occurring and to document this training. Proof of manager training was provided, as well as the documentation of the SAFE briefs distributed to staff during the summer. Evidence of weekly SAFE Observations was also provided. Park staff appreciate the attention given to risk management and hope that the reduction in risk management issues and accidents this season was in part due to these efforts. The NPS does note that some persistent issues remain that can be attributed to lack of training. For example, there does not seem to be Hazards Communications program in place. NPS staff frequently found issues with chemical use, storage, labeling and missing SDS documentation. Training was occurring with housekeeping staff and improvements were made over the season, but hazard communications training should be documented for all staff.

As a companion to the RMP, Crater Lake Hospitality does have a comprehensive Emergency Action Plan and Emergency Response Plan. This document needs updates, it appears that this was pulled from another property, as there are references to resources that do not exist at

Crater Lake (Lodge Dispatch Office, NPS Facility Response Plan, incorrect phone and radio numbers, etc.).

During 2020, CLH focused their risk management efforts on creating a comprehensive COVID-19 operation plan because of the global pandemic. CLH worked closely with the NPS to develop a well throughout out strategy to protect the health and safety of their staff and guests, while still providing needed visitor services. CLH staff continued to execute and adapt this plan throughout the season as public health guidance evolved. While it is difficult to measure the effectiveness of this plan, it is worth noting there were no reported COVID-19 cases among concessions staff that were linked to their employment or within in-park housing. CLH staff also did a good of managing visitor use and expectations and generally resolved any conflict before they escalated. Any deviations from the plan noted by NPS staff were generally addressed immediately. One issue that did arise was CLH planned to double up on room occupancy because they did not have enough staff and didn't notify the NPS. The NPS observed this in an HR notice placed on room doors and notified CLH that this was not in their pandemic plan and was counter to NPS policies. CLH did not implement that double occupancy plan.

In addition to the pandemic it was also an active wildfire season. At one point fires were active along all the major park access routes and the NPS issued a Level I evacuation readiness notice. During this process CLH updated their evacuation plan in close consultation with the park's law enforcement staff. The plan was well thought out and communicated among CLH management. One improvement for future years would be better communication with all concessions staff during fire season. Because of the limited park egress at one point during high fire activity there was a lot of concern about employee safety. The NPS is willing to provide more frequent community meetings during incidents to help calm fears, answer questions, and ensure readiness. It is recognized that COVID-19 protocols made it difficult to coordinate these events during 2020. It is recommended that discussions about wildland fire and evacuation readiness and protocols be added to CLH employee orientations.

While there are still gaps in the CLH Risk Management Program at Crater Lake the risk management activities prescribed at the corporate level seemed to be better implemented this rating period. Development of local resources is still needed in support of prescribed plans. With the General Manager identified as the Safety and Health Official and person responsible for implementing the Risk Management Program, the program was receiving attention, but did not experience growth beyond ensuring compliance with some existing corporate programs. With the turnover in the General Manager position, we hope that this program continues to be implemented.

### **Environmental Management**

Crater Lake Hospitality submitted their Environmental Management Program Plan (EMPP) on June 18, 2019. The plan has not subsequently been updated. Although the submitted EMPP addresses the required elements of an Environmental Management Program, very few, if any, of the activities outlined in the program plan have actually been implemented. For example,

the plan describes how CLH “will develop an Environmental Policy that outlines the desired course of action and guiding principles intended to influence and determine decisions and actions regarding environmental management.” This policy has never actually been developed. The EMPP describes a variety of roles and responsibilities for members of the Environmental System Management Team, but none of these roles have been assigned. Goals and targets for improvement are to be established and assigned based on an identified list of environmental aspects, but this list was never generated. A number of reports are to be generated annually, including an Inventory of Hazardous Substances and Inventory of Waste Streams, but these have not been prepared or submitted.

Some efforts have been made to communicate sustainability initiatives and/or environmental awareness to the visiting public. Lodging registration cards warn about human/wildlife interaction and placards in lodge rooms educate guests on water conservation. The CLH website lists a number of sustainability actions that CLH has supposedly taken to reduce their environmental footprint. However, CLH has not initiated many of these activities on site. The NPS did point this out in their review of the concessioner’s website, but it has not been addressed or changed. Internal communication has not taken place as described in the EMPP. The EMPP describes a staffing plan in which all training requirements for the respective positions have been identified and lists a variety of training formats. However, none of this training has been completed or documented. The EMPP describes procedures for monitoring, measurement, and corrective action, including an annual audit, but this has not occurred.

CLH was required to implement a “Zero Landfill” program within the first year of operations, to include conducting a Solid Waste Audit by July 31 and subsequently reducing solid waste by 75% within the year. A Waste Stream Report was to be submitted at the end of the year. This program was not initiated and simply managing waste has been a consistent problem. A 30-yard dumpster was placed outside Rim Dorm to collect trash from the Rim Café and Lodge, but staff continually removed the covers, allowing wildlife to access it. Food composters were not installed in any kitchens as required and only limited efforts were made to source food from local vendors, as Sysco is the only food supplier used.

The contract also requires several initiatives related to water and energy conservation. CLH was required to develop a Water Conservation Management Plan within the first 120 days of the contract and conduct a Water Use Audit. CLH is also supposed to be working towards replacement of all existing fixtures with WaterSense compliant fixtures and installing remotely monitored water use sensors throughout the property. These efforts have not been completed though some work has begun on upgrading lighting fixtures.

Crater Lake Hospitality did not hire a designated staff member to oversee the Environmental Management Program which is likely why little progress has been made on developing an environmental management program. The NPS understands that due to COVID-19 attention turned away from sustainability to focus on immediate health concerns. The NPS did extend the deadline to implement a zero waste program and requested the concessioner to set alternate

waste reduction goals. We hope that CLH begins to refocus efforts on environmental management in 2021.

### **Public Health**

USPHS completed a single round of inspections during 2020, for a total of 6 individual inspections. All inspections resulted in “satisfactory” ratings for the facility. The Annie Creek Café, the Lodge, the Lodge EDR and Rim Café all received violations for cleaning issues. The Rim Café had food handling and improper reheating violations. Cleaning issues persisted during periodic inspections. Also noted were issues with temperature control and log keeping. However, overall, food service operations continued to operate satisfactory over the season.

### **Asset Management**

During this rating period, Crater Lake Hospitality staff became more proactive in managing their assigned assets. Winter staff were completing daily system checks and performing building maintenance. Over the winter, routine maintenance projects were undertaken including repainting and recarpeting the Crater Lake Lodge and Mazama Cabins. Furniture and soft goods were also replaced which were a nice update for guests.

CLH did experience issues in preparing facilities for opening. NPS inspections conducted prior to opening found widespread maintenance deficiencies including life-safety issues that precluded occupancy (blocked egress, non-function exit lights, blocked sprinkler heads, non-functional emergency lighting, electrical issues, etc.). CLH requested an inspection of Rim Dorm the same day they intended to open the building for occupancy. Since the building did not meet basic code requirements, residents were placed in other park lodging for the evening until the issues were addressed.

Fire alarm systems continued to be an issue for CLH this operating period. In February, the fire suppression system in the Annie Creek Restaurant experienced a line failure and approximately 206,000 gallons of water flowed overnight, wetting the entire building. When the NPS investigated it was found that there was an issue with the flow valve assembly identified by a contractor that did not appear to have been corrected and may have contributed to the incident. The alarm also did not dial out to notify emergency responders that the fire suppression system had activated. This issue had been noted in 2019 and continued for several months without being addressed. After the flow incident, the fire panels communication issue was quickly repaired.

As the rating period progressed, the CLH asset management team did make progress on lingering deficiencies that were left unaddressed from 2019. Additionally, while due to the pandemic only one periodic evaluation was conducted for each location, informally it appeared the CLH staff was more efficiently correcting facilities deficiencies noted during inspections.

There is still work to be done on the numerous upgrades to improve water and energy efficiency outlined in the contract maintenance plan. Little progress was made in this area.

Progress on the required CFIP projects continued to stall. To date, project proposals seem to be focused on “refreshing” design elements rather than upgrading or remodeling facilities, as outlined in the contract. Although we appreciate these efforts to improve the visitor lodging experience in 2020, we do hope to see significant progress towards the contractually required facility upgrades in 2021.

Additionally, project proposals continue to be submitted late and without the level of detail requested by the NPS in order to make compliance decisions. Other projects have had change requests after approval for items that should have been identified during project development, indicating a lack of initial planning. Project proposals should be thought out well in advance and provide a higher level of detail to allow the NPS to conduct more complete and efficient compliance reviews.

Planning continues to be an issue for CLH. In 2020 no Annual Concessioner Maintenance Plan was submitted which would have identified projects well in advance to ensure proper prioritization, thorough planning, and realistic scheduling. The required Computerized Maintenance Management System (CMMS) is still not in use. No work orders have been provided to the NPS and staff are concerned about data loss concerning facility assets if work completed over the last two years is not logged. It is critical to document when buildings should and do receive periodic maintenance and to update the operational manuals when new parts or systems are installed. This does not appear to be occurring.

Despite the initial challenges, we do believe that maintenance staff made an earnest effort to maintain concession assets as the year progressed. The following projects/work was completed in 2020:

- Mazama Cabins
  - Carpet Replacement
  - Installed new Hot Water Recirculation Pumps
  - Repaired or upgraded Heaters
  - Installed a new electrical feed to Cabin B
  - Completed Fire Suppression System 5 Year Inspection
  - Installed new Smoke Detectors
  - Repainted the room interiors and exterior doors
  - Purchased new Furniture, Beds, and Art
  - Installed keycard Door Locks for security and convenience
  - Installed new Shower Heads
  - Repaired/ replaced Shower Valves/Trim Kits
- Rim Café and Gift Shop
  - Installed New Kitchen Equipment
  - New Cabinets
  - Completed Fire Suppression System 5 Year Inspection
- Rim Dorm

- Installed new Radio Repeater
- Completed Fire Suppression System 5 Year Inspection
- Crater Lake Lodge
  - Installed new Phone System
  - Upgraded the Internet to 100MB service
  - Toilet Tank Pressure Tank repair / replacement
  - Installed new Carpet
  - Repainted hallways and guest rooms.
  - Completed Fire Suppression System 5 Year Inspection
  - Completed boiler Glycol conversion
  - HVAC Repairs (room heaters, sheaves, belts, filters, controllers, valves, Ect.)
  - Johnson Control Upgrade
  - Wood Floor Refinish
  - Dining Room Tables Refinished
- Mazama Dorms
  - Completed Fire Suppression System 5 Year Inspection
  - Installed new washer and dryers

### **Administrative Compliance Reporting**

Crater Lake Hospitality provided all required services agreed to in then “Notification of changes in Concession Contract No. CC-CRLA004-18 Related to Crater Lake National Park COVID-19 Adaptive Operations Recovery Plan” issued on June 13, 2020 and updated on August 24, 2020 and generally met administrative reporting requirements. Mazama Cabins and the Annie Creek Restaurant closed early on September 13 (rather than September 28), but this was approved by the NPS as wildfires had resulted in the inability to access the park and widespread cancellations. CLH submitted Franchise Fee reports on time but did not make franchise fee payments between April and August. Water, wastewater, and fuel are provided by the NPS, with CLH being billed for water and sewer services. No utility payments were made between January and May.

Last year there seemed to be payments being incorrectly made to Crater Lake or Yosemite, as they hold the concession contract there as well. This issue has persisted this year with payments being made to Crater Lake that were not invoiced by the park.

CLH was found to be charging incorrect rates for much of the season. This resulted from a reduction of the county tax rate to 1.5% on July 1, 2020 (from 1.8%). This required a large number of small refunds to park guests.

There was a strong focus on reporting with GM manager (b) (6) . He ensured that visitor comments, employee contact lists, employee rent schedule and updated housing policy, and other required reporting were submitted on time. HR staff also managed the employee parking pass distribution well, ensuring compliance with NPS requirements.

Employee conduct was improved over last season. The NPS had less law enforcement contacts and the concessions program did not receive any complaints from concessions staff. One manager did resign after an incident of unauthorized fueling of a private vehicle. There also appeared to be a reduction visitor comments about employee complaints and morale. Aramark visitor comments did still show a trend in complaints about “unfriendly or unhelpful” staff, but it is recognized that there were staffing challenges related to the pandemic that may have contributed to stressful working conditions for CLH employees. We did appreciate the flexibility CLH demonstrated in working with the NPS in reducing hours of facilities when adequate staffing could not be maintained, or demand was waning.

**Annual Visitor Use Statistics/Utilization Data**

Service/Facility	2019 Customers	2020 Customers	Percent Change over 2019
Crater Lake Lodge	(b)	(4)	(4)
Mazama Cabins			
Mazama Campground			
Boat Tours			
Lodge Restaurant			
Annie Creek Restaurant			
Rim Café			
Service/Facility	2019 Rooms/Sites	2020 Rooms/Sites	Percent Change over 2019
Crater Lake Lodge	(b)	(4)	(4)
Mazama Cabins			
Mazama Campground			

Park visitation was 670,500, down 4.8% over 2019’s 704,512 visitors. The park was closed from March 24 through June 8 in response to the COVID-19 pandemic. Despite all the challenges, CLH was able to modify and open all concession operations except for boat tours. Significant wildfire activity in the region in September curtailed visitation through the end of the season. As a result, CLH chose to not extend any operations past the scheduled closing dates.

**Problems/Issues and Resolution**

Crater Lake Hospitality showed overall improvement over their 2019 operations and demonstrated resiliency as they navigated the challenges of operating under frequently changing COVID-19 public health guidelines. Issues encountered are noted throughout this document. In addition:

There were continued issues with the central reservation system. This year, visitors complained of the inability to contact reservation staff and exceedingly long waits to speak to an agent. Although required by the contract, the campground reservation system does not allow guests



to select their own sites. CLH is considering moving to recreation.gov to address this. Reservation agents were giving incorrect information, for example telling Senior Pass holders that they would not receive a discount. Visitors also complained that refunds were not being processed in a timely manner. The long wait times persisted throughout the season, but CLH management attempted to mitigate this by setting up an email address for cancellations and by speaking with guests directly with reservation issues. GM Jesse Horner handled all the reservation related complaints directly and resolved guests concerns quickly.

Crater Lake Hospitality continued to struggle with IT and communication issues. But progress was made over the rating period. CLH installed a new VOIP phone system and improved the phone tree. A new 100MB ethernet circuit was also added to Rim Village which should greatly improve internet access for guests and employees.

The NPS appreciates the efforts to resolve the lingering issues and move towards contract compliance. Turnover continues to be an issue in management positions and some positions have yet to be permanently filled. A new HR manager is being hired to handle personnel issues. A Sustainability Manager is being hired to implement the Environmental Management Plan and associated contractual requirements. At the end of the year, CLH decided to hire a new General Manager, this contract's 4th. It is our hope that continued emphasis will be made on filling and retaining employees in these key positions and providing the resources necessary to ensure quality visitor services.

### **Visitor Satisfaction**

Due to the pandemic, the park did not collect written comments most park facilities were closed. The park did receive numerous calls and emails commenting on CLH services. These comments, as well as comments provided directly to CLH, were addressed by GM (b) (6) GM (b) (6) provided the NPS a biweekly comment report with his responses. Most comments received by the NPS concerned not being able to contact the concessioner about lodging and dinner reservations, cancellations, refunds, etc. Concerns sent directly to CLH were largely negative experiences, refund requests and reservation issues. Some positive comments were also received on friendly or helpful service from particular staff members.

Inn October, Crater Lake Hospitality provided a copy of their customer satisfaction report. The report only provided an overall rating and comment. 1,224 responses were received from visitors who had held lodging reservations, including the campground. It should be noted, however, that comments accompanying ratings did not always seem to reflect the numeric score. For example, some exceptional ratings were accompanied by comments reflecting dissatisfaction with services received. NPS read the comments and found that approximately 421 (34.4%) provided general comments on the park or services, 480 (39.2%) reported exceptional service, and 323 (26.4%) were dissatisfied. Comments were wide ranging but common themes emerged. These include: complaints about the campground reservation process, complaints about the quality of food at the lodge, warm temperatures in lodge rooms or confusion about room types (bathroom concerns), quiet hours were not enforced at

campground, issues with reservations or not receiving refunds, remarks that the survey process was confusing, and some concerns about employee friendliness and helpfulness. Positive comments were primarily focused on friendly or helpful service from particular staff members. Next year the NPS will work with CLH to see if more meaningful metrics can be gathered to try determine areas that were successful and that needed improvement, if possible. The NPS also requests more frequent distribution of comments so both CLH and the NPS can follow-up on any issues that emerge.

### **Future Plans for Concession Operations**

With the onset of a Global pandemic in the early days of 2020, it was another challenging year for Crater Lake Hospitality. Overall, CLH did focus their efforts on providing visitor services they could manage with a limited staff and did so while providing for visitor and employee health and safety. Understandably, attention did turn away from contact requirements and initiatives that had not been completed or initiated as required in 2019. We hope that operations become more predictable in 2021, as it appears that the demand for hospitality services will be present and park visitation will continue to grow.

To refocus efforts, the NPS requests that the following contract requirement, which are directly correlated to the safety of staff and visitors, conservation of resources, and facility management and should be prioritized for completion in 2021:

1. Re-submit a Risk Management Plan that fully addresses the scope of the operations at Crater Lake **no later than August 1, 2021**. (Exhibit B: Operating Plan, B-15)
  - Assign a Safety and Health Official with responsibility for carrying out the RMP
  - Develop resources in support of the RMP, including SOPs, training plans, data management system, etc.
  - Ensure all staff receive training in the RMP prior to beginning work for the season
    - Identify and execute duty-specific training plans as needed.
  - Make necessary corrections to the Emergency Action Plan/Emergency Response Plan and ensure staff are trained on emergency procedures.
  - Document all training and maintain records on-site.
2. Submit a schedule outlining how the Environmental Management Program Plan will be implemented on-site **no later than July 1, 2021**. (Exhibit B: Operating Plan, B-15)

At a minimum, the document to be completed on the proposed schedule must include the following:

- Assign an Environmental Program Manager with responsibility for carrying out the established EMP.
- Provide a clear statement of the Concessioner's commitment to the Environmental Management Objectives (policy).

- Identify environmental responsibilities for employees and contractors
- Identify a list environmental goals for the organization with specific targets for achievement within the year.
- Identify how the concessioner will manage environmental information, including plans, permits, certification, reports, and correspondence with environmental agencies and report environmental information to the NPS
- Identify plans for self-assessment of performance under the EMP and describe procedures to be taken to correct any deficiencies identified

Additionally, the concessioner must:

- Develop site-specific resources in support of the EMP, including plans, procedures, manuals, etc.
  - Ensure all staff receive training on the EMP prior to beginning work for the season.
  - Identify and execute duty-specific training plans as needed.
  - Document all training and maintain records on-site.
3. Implement programs to reduce solid waste generation and improve storage, collection, and disposal procedures, as outlined in the Maintenance Plan (Exhibit H: Maintenance Plan, H-16)
    - Work with contracted waste hauler to begin recycling all readily accepted materials **no later than August 1, 2021.**
    - Implement the Zero Landfill Initiative and **work towards 75% reduction of waste in 2021, or propose an alternative goal** with a detailed justification if currently recycling market conditions and pandemic concerns make the contract goal unobtainable
  4. Implement programs to improve water and energy efficiency across the operation, as outlined in the Maintenance Plan (Exhibit H: Maintenance Plan, H-16)
    - Submit a schedule for the development of a Water Conservation Management Plan that identifies the physical change initiatives, operational changes, continuous search for new technologies, employee engagement, and annual conservation goals of the concessioner **by August 6, 2021.**
  5. Prepare an Annual Concessioner Maintenance Plan and Report (Exhibit H: Maintenance Plan, H-19) to identify projected maintenance activities for 2022 and beyond and submit to the park for review and approval **by December 31, 2021.**
    - Work with the NPS to establish a schedule for submission of Project Statements well in advance of planned work to allow sufficient time for review and approval.
  6. Develop, implement and administer the Computerized Maintenance Management System (Exhibit H: Maintenance Plan, H-3) and begin using it to track the condition and work associated with concession facilities **by the end of 2021.**

7. Prepare a Concessioner Project Plan and Report (Exhibit H: Maintenance Plan, H-19) to identify new construction, Major Rehabilitation, and Component Renewal projects scheduled for 2021 and beyond and submit to the park for review and approval **by August 31, 2021.**

Additionally, we hope to see improvements in the areas of Operational Performance and Public Health continue as CLH managers continue to refine these operations based on lessons learned over the past two years. Priorities should be guided by contractual requirements and the results of this AOR, with input from NPS concession managers.

Although the concessioner is also required to provide lodging, food and beverage, and retail services at the Chateau in Oregon Caves National Monument, these services were not provided in 2020 as the Chateau was closed due to an ongoing NPS project to rehabilitate the historic structure to meet life, health, safety and accessibility standards. The Chateau will remain closed until at least 2022. We look forward to seeing CLH's plans for providing services for visitors to Oregon Caves once the rehabilitation project is complete.

#### **Accomplishments or Outstanding Work**

This was an extremely challenging year for Crater Lake Hospitality. Public health guidance frequently changed and CLH quickly adapted to these requirements. Housing restrictions and other factors limited the ability to hire and retain staff, so CLH adjusted service types and hours of operation in order to provide services that visitors desired in a safe manner. Despite the pandemic, the extended park closure, and an active wildland fire season, visitation was only down 4% over the previous year. This level of visitation is rather remarkable and the NPS anticipates the park will continue to receive high levels of visitation. We hope the operational improvements implemented during the 2020 season will continue as the concessions operation trends back towards all services being offered and guest demand continues to grow.

This season the CLH management team did an excellent job of communicating with NPS staff and managing the complex issues related to the pandemic. Experienced managers were hired from inside and outside Aramark, and all demonstrating a commitment to providing quality visitor services. Incoming GM (b) (6) quickly got up to speed on contract requirements and began addressing the deficiencies from 2019. This progress is reflected in the increases in AOR scores across program areas. The NPS appreciates the efforts made towards advancing CLH contract requirements, all while dealing with the uncertainty and stress of a pandemic. We look forward to working with you as CLH continues to refine its operations within Crater Lake National Park.

**United States Department of the Interior - National Park Service**  
**Form 10-AOR - Annual Overall Rating Report**

Year of Operation: 2021

Park: CRLA

Contract Term Effective Dates: 11/1/2018 through 10/31/2030

Concessioner Name: Aramark

Concessioner DBA: Crater Lake Hospitality

Contract Number: CC-CRLA004-18

**Table 1: AOR Score**

Category	Scores	Adjusted Scores	Rating
Administrative Compliance (10-ADM)	90.6	90.6	Superior
Operational Performance (10-OPR)	68.4	68.4	Marginal
Public Health (10-PHP)	90.0	84.0	Marginal
Risk Management (10-RMP)	95.7	95.7	Superior
Environmental Management (10-EMP)	85.7	69.0	Marginal
Asset Management (10-AMP)	47.4	47.4	Unsatisfactory

AOR Score	79.6
Adjusted AOR Score	69.0
Rating	Marginal

Superior = 90 – 100  
 Satisfactory = 70 – 89  
 Marginal = 50 – 69  
 Unsatisfactory = ≤49

**Notes:**

- The final AOR score is the average of all applicable category scores. The Adjusted AOR Score is used for ADM, PHP, RMP and EMP (see individual pages for details).
- If the Concessioner receives an Unsatisfactory on any of the forms, the final AOR score is capped at 69 and final AOR rating can not exceed Marginal.
- If the Concessioner receives a Marginal on any of the forms, the final AOR score is capped at 89 and final AOR rating can not exceed Satisfactory.
- If a periodic evaluation (10-OPR) has not been completed for the contract during the year of operation, the final AOR score is capped at 89 and final AOR score can not exceed Satisfactory.

**Table 2: Superintendent Approval / Signature**

**Superintendent Approval / Signature**

**Instructions:** The park superintendent has the authority to adjust the final concessioner AOR rating. Please use the space below to enter the final superintendent-approved rating. If the rating has been altered from the calculated rating (shown above), please also include notes to explain why the change occurred. Please see Tab "Instructions and TOC" for instructions on signing AOR.

Superintendent Approved Rating **MARGINAL**

**Narrative** (explain reasoning for any changes made by the superintendent)

Superintendent's Signature 

Date 3/31/2022

Concessioner Signature (b) (6)  
 (to signify receipt of rating)

Date 3/31/22

**Table 3: Evaluation Narratives**

**Evaluation Narratives**

**Instructions:** Narrative assessment and comments on the Concession Annual Overall performance for the year are mandatory. Please use the outline below to organize the narratives. Enter "N/A" under outline headers which are not applicable.

If you wish to attach a separate document to this Workbook as supporting materials, please see the instructions located on Tab "Instructions and TOC". Refer to any attachments in the space provided below. Please also use attachments if your text does not fit inside the boxes below.

*Hint: To start a new paragraph in the comments area, hold the ALT key and hit enter twice, then continue typing the next paragraph.*

<b>CFIP / Construction / Repair and Maintenance Reserve or Rehab Projects</b>	See attached narrative.
<b>Leasehold Surrender Interest / Possessory Interest</b>	No LSI was incurred during the 2021 operating period.
<b>Franchise Fees</b>	Crater Lake Hospitality successfully paid all franchise fees accurately and on time. No fees were collected between December 2020 and March 2021, as CLH was not operating during this period due to Covid-19. In total, 2021 franchise fees totalled \$1,331,297; up 21% from 2020.
<b>AFR</b>	Crater Lake Hospitality submitted its AFR on time on January 25th, 2022, before its due date of January 31st, 2022 (CLH fiscal year aligns with the service FY, ending on October 1st).
<b>Insurance</b>	No insurance documents were received by the service for 2021. As a result, no third-party audit was performed. Insurance documents were later provided upon request in 2022.
<b>Risk Management</b>	See attached narrative.
<b>Environmental Management</b>	See attached narrative.
<b>Public Health</b>	See additional notes in 10-PHP and attached narrative. One "Unsatisfactory" rating was received for Crater Lake Lodge dining.
<b>Asset Management</b>	See attached narrative.
<b>Administrative Compliance Reporting</b>	Crater Lake Hospitality provided all required services agreed to in the "Notification of changes in Concessions Contract No. CC-CRLA004-18 Related to Crater Lake National Park COVID-19 Adaptive Operations Recovery Plan" issued initially on June 13, 2020, and subsequently updated on August 24, 2020 and October 28, 2021. Franchise fees and other monthly administrative reporting were consistently received on the 15th of every month, if not before.
<b>Annual Visitor Use Statistics / Utilization Data</b>	See attached narrative.
<b>Problems / Issues and Resolution (include outstanding problems/issues and intended resolution)</b>	See attached narrative.
<b>Accomplishments or Outstanding Work</b>	See attached narrative.
<b>Future Plans for Concession Operation(s)</b>	See attached narrative.
<b>Visitor Satisfaction</b>	Overall, customer satisfaction for 2021 was acceptable, despite several difficulties faced by the hospitality industry due to staffing levels, supply chain issues, and other effects of the Covid-19 pandemic. Common complaints from the public included masking mandates, fire/smoke impacts and fire bans, low staffing levels, and unavailable food items. Several other complaints were addressed by CLH, including online and phone reservation issues (reservations not available a year in advance, out-of-park reservation centers giving inaccurate information about the park and amenities available, etc), and campground reservation confusion (no reservations available in June due to unpredictable weather, etc). CLH actively worked with their reservation and website teams to make information to the public as clearly as possible, as well as submit rate requests to allow reservations to open for 2022.

**Final Remarks:**

The Service acknowledges that 2021 was a difficult year due to the ongoing pandemic and change in management staffing. CLH is actively working to become compliant with its contract and has made substantial strides toward that goal throughout 2021. Ongoing discussions about delinquent reporting, incomplete projects, project proposals not meeting contract requirements, environmental obligations, and maintenance upkeep have happened throughout the year and CLH is demonstrating efforts toward meeting these requirements. The Service appreciates their ongoing efforts to improve the operation, however substantial and longstanding issues to meet contract requirements remain. The Service looks forward to working with CLH in 2022 to make further improvements and build upon successes.

**United States Department of the Interior - National Park Service**  
**Form 10-ADM - Administrative Compliance Report**

<b>Park</b>	<u>CRLA</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2021</u>
<b>Contract Number</b>	<u>CC-CRLA004-18</u>		

**Instructions:**  
For each element (row), use the drop-down or type in Column F (yellow) to specify if the element is either 1) in compliance ("Yes"), 2) not in compliance ("No"), or 3) not applicable ("N/A") for the concessioner under evaluation. If the element is either not in compliance or not applicable, use the "Remarks" box at the bottom of the form to provide an explanation.

**Notes:**  
- Elements marked with an asterisk (\*) represent "Special Attention Items." See comments at the bottom of the page for more information on how that affects scoring.  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.  
- For 8.B., use the concessioner's due date for their 2020 Annual Financial Report to complete the evaluation. If the 2020 AFR is not available or another year is used for any reason, please indicate the AFR year in the Remarks section below.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Services and Operations</b>	1.1*	All required services were provided by the Concessioner.	Yes	Boat tours, shower, and laundry services were not provided as a result of agreed-on operating changes due to the ongoing COVID-19 pandemic.
	1.2*	All services provided by the Concessioner were authorized by the Contract.	Yes	
<b>2. Concessioner Personnel</b>	2.1	The Concessioner established and implemented policies and procedures for pre-employment screening, hiring, training, employment, review of employee conduct, and termination of employees in accordance with the Contract.	Yes	
	2.2	The Concessioner was in compliance with Applicable Laws relating to employment and employment conditions including those in the Non-Discrimination Exhibit of the Contract.	Yes	
	2.3	The Concessioner developed and implemented appropriate training programs for employees in accordance with the Contract.	Yes	
<b>3. Legal, Regulatory and Policy Compliance</b>	3.1	Has the concessioner received a violation(s) of any Applicable Laws? <b>If no, move to Section 4.</b>	No	No violations were noted.
		i. Did the Concessioner inform the park superintendent?		
		ii. Did the Concessioner rectify the violation(s) in a timely manner?		
		iii. Was the violation resolved and closure documentation submitted to the park?		
<b>4. Concession Facilities and Government Personal Property</b>	4.1	The Concessioner operated only within the Assigned Land and Concession Facilities as identified in the Contract.	Yes	
	4.2	Government personal property assigned to the Concessioner was maintained in good and operable condition, and properly returned to the NPS for disposition if no longer serviceable.	Yes	Several government-owned personal property items were returned to NPS for disposition in 2021.
<b>5. Construction or Installation of Real Property Improvement</b>	5.1	Any request for leasehold surrender interest was made in accordance with the requirements of the Contract.	N/A	No requests made.
	5.2	Is there a Concession Facilities Improvement Program applicable to this rating period? <b>If no, move to Section 6.</b>	Yes	Rehabilitation of Rim Dormitory, Annie Creek Restaurant Improvements, Rim Village Café Building Improvements, Mazama Village Camper Store Improvements.
	5.3	The Concessioner submitted plans and specifications for approval by the Superintendent.	Yes	Plans for the Rim Dorm were submitted but were incomplete as they did not meet or otherwise address contractual requirements for the project.
	5.4	The Concessioner started the project on time.	No	Although CLH is actively working on several CFIP projects, none were started on time and all are still in preliminary phases. Due dates were adjusted due to COVID-19, but these start dates were missed as well.
	5.5	The Concessioner completed the project on time.	No	None of the projects were completed on time.
	5.6	The Concessioner submitted documentation to confirm that expenditures of the program were in accordance with the Contract.	No	As these projects have not been started, documentation that expenditures are complete is not available and so has not been submitted.

6. Tracking and Payment of Required Fees	6.1*	If a maintenance expense is required, the Concessioner expended the minimum amount required by the Contract during this rating period.	Yes	
	6.2*	The Repair and Maintenance Reserve was spent correctly.	Yes	CLH local management did not have an understanding of what qualifies as a Repair and Maintenance Reserve eligible project and often had to resubmit projects or documentation to meet requirements.
	6.3*	The Concessioner submitted all required franchise fees and required reports on time, including the monthly franchise fee report.	Yes	
	6.4	If applicable, interest assessed on overdue franchise fee amounts was paid.	N/A	
	6.5	Handicraft sales claimed as exempt from franchise fees were supported by appropriate documentation, e.g. invoices bearing a certification by the supplier that the items were Authentic Native Handicrafts.	Yes	Handicraft invoices were received upon request in March 2022. Invoices are requested upon receipt from vendors in the future.
7. Indemnification and Insurance	7.1*	The Concessioner provided the superintendent with a current Certificate(s) of Insurance.	Yes	A current Certificate of Insurance was not provided during 2021 due to turnover in CLH management and closures due to Covid-19. A certificate was provided in 2022 upon request.
	7.2*	The Certificate(s) of Insurance documented that the Concessioner was compliant with all insurance coverages required in the Contract. This compliance may be determined through a review by a third party consultant.	Yes	As the current certificate was not provided, it was not audited by a third-party consultant. However, insurance matched the coverage limits that were approved in 2020.
8. Accounting Records and Reports	8.1	If this is the first year of a Contract, the opening balance sheet was submitted as required by the Contract.	N/A	
	8.2*	The Concessioner submitted the Annual Financial Report (AFR) due within this rating period.	Yes	Aramark Submitted the AFR on January 25, within the rating period, and required 120-day window from the close of the fiscal year (October 1st).
	8.3*	The Concessioner submitted the AFR on time.	Yes	
	8.4*	The AFR was audited by an independent licensed or certified public accountant, if required.	Yes	
9. Other Reporting Requirements	9.1	The superintendent may require the Concessioner to submit reports and data regarding its performance under the Contract. Some common reporting requirements are listed below.		
		i. Visitor Use Statistics/Operating Reports	Yes	
		ii. Customer Comment Reports	Yes	
		iii. Hours of Operation	Yes	
		iv. Management Listing	Yes	
		v. Inventory of Waste Streams	Yes	CLH provided its first waste stream inventory this rating period (was not provided 2018 - 2020).
		vi. Employee Handbook	Yes	
vii. Any additional pertinent reports	Yes	Other reports include: Employee List, Housing rules and rates (submitted June 15th), etc.		
10. Assignment, Sale or Encumbrance of Interests	10.1	If the concession was sold or transferred during this rating period, the Concessioner fulfilled all obligations stipulated by the Contract.	N/A	
	10.2	If the name of the business has changed in the past year, give new name below:		
11. Sub-concessions	11.1	If there were any agreements with third parties to provide services authorized or required in the Contract, list the services they provided below:		
	11.2*	All sub-concessions were approved by the superintendent.	N/A	
12. Utilities	12.1	List utility services provided by the NPS for the Concessioner (If there are no utilities provided by the NPS, enter N/A):		Water, Wastewater (NPS winter fuel services ceased being provided in 2019).
	12.2*	The Concessioner paid for the utility services provided in a timely manner.	Yes	
	12.3*	If a utility add-on was approved, the Concessioner submitted all required reports, including the distribution of add-ons and reconciliation reports.	N/A	
13. Advertising and Promotional Materials	13.1	The Concessioner obtained NPS approval for all promotional material prior to publication or distribution.	Yes	
	13.2	If the Concessioner used the Concessioner Mark, the Concessioner obtained approval prior to using the Mark and followed the guidelines for using the Mark.	Yes	
	13.3	The Concessioner's websites and social media sites contained accurate and relevant information.	Yes	



<b>14. Contract Transition</b>	14.1	If the Contract was in transition, the Concessioner managed operations appropriately to achieve an orderly transition of operations and avoided disruption of services, including adhering to the provisions stipulated in Exhibit J "Transition to a New Concessioner."	N/A	
<b>15. Other Requirements</b>	15.1	The Concessioner was in compliance with all terms of the contract, not otherwise addressed in the administrative compliance, service or program-specific reviews.	Yes	

<b>ADDITIONAL NOTES / COMMENTS</b>				
Please see the attached narrative.				

**Table 2: Scoring**

<b>Scoring</b>				
<b>Program Area</b>	<b>Score (%)</b>	<b>Program Area</b>	<b>Score (%)</b>	
1. Services and Operations	100.0%	9. Other Reporting Requirements	100.0%	
2. Concessioner Personnel	100.0%	10. Assignment, Sale or Encumbrance of Interests	n/a	
3. Legal, Regulatory and Policy Compliance	n/a	11. Special Provisions – Sub-concessions	n/a	
4. Concession Facilities and Government Personal Property	100.0%	12. Special Provisions – Utilities	100.0%	
5. Construction or Installation of Real Property Improvement	25.0%	13. Advertising and Promotional Materials	100.0%	
6. Tracking and Payment of Required Fees	100.0%	14. Contract Transition	n/a	
7. Indemnification and Insurance	100.0%	15. Other Requirements	100.0%	
8. Accounting Records and Reports	100.0%			
<b>Total - All Program Areas</b>				
<b># In Compliance (Yes)</b>	<b># Deficient (No)</b>	<b># Deficient (Special Attention Item)</b>	<b># N/A</b>	<b># Applicable Requirements</b>
<b>29</b>	<b>3</b>	<b>0</b>	<b>10</b>	<b>32</b>
<b>Administrative Compliance Score</b>		<b>90.6</b>	Superior = 90 – 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = ≤49	
<b>Adjusted Administrative Compliance Score</b>		<b>90.6</b>		
<b>Rating</b>		<b>Superior</b>		
<i>Notes:</i> 1) If 1-2 Special Attention Items are not in compliance, the Administrative Compliance Score is adjusted to Marginal and capped at 69. 2) If 3+ Special Attention Items are not in compliance, the Administrative Compliance Score is adjusted to Unsatisfactory and capped at 49.				

**United States Department of the Interior - National Park Service**  
**Form 10-OPR - Concession Operational Performance Report**

<b>Park</b>	<u>CRLA</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2021</u>
<b>Contract Number</b>	<u>CC-CRLA004-18</u>		

**Instructions**  
Fill in the (yellow) highlighted cells in the table below with the following information:

**Location** – List the concession location/facility being evaluated. **(Note Location MUST be filled out in order to activate the scoring on this form.)**

**Service Type** - List the service type being evaluated (Note: If a single location/facility has multiple service types, the facility should receive multiple rows in the table, one for each service type).

**Weighting** - Add a weighting value based on the importance of the service to the park: 1 = low importance, 2 = medium importance, or 3 = high importance. **(Note Weighting MUST be filled out in order for the form to work properly. If the user wishes to have all locations/services have equal weights, simply select the same weighting for each.)**

**Periodic Evaluation (PE) Score(s)** – For each location/service type, enter the score (1-5) the concessioner achieved in PEs performed during the evaluation year. (Note: If multiple PEs were performed during the year, enter them in columns F, G and H).

If you require more than the 20 rows in Table 1, click the "+" button on the left side of this worksheet (near row 141) to add additional rows.  
If you require more than 120 rows in Table 1, please contact [cs\\_cm\\_helpdesk@nps.gov](mailto:cs_cm_helpdesk@nps.gov) for a new version of the AOR Workbook.  
If you have completed more than four PE's during a given year, please contact [cs\\_cm\\_helpdesk@nps.gov](mailto:cs_cm_helpdesk@nps.gov) for a revised 10-OPR form with additional columns.

**Notes:**  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

<b>If no periodic evaluations were completed for this Contract during this rating period, enter "X" in the box on the right.</b>	
--	--

**Note** If no periodic evaluations were completed, please explain why in the "Comments" box below.

**Table 1 Facility Evaluation**

**Hints:**  
- To delete unnecessary/extra rows from the table below, select the desired rows to delete and hold **Ctrl + Shift + D** on your keyboard.  
- **DO NOT** insert individual rows into the table below.

Location / Facility	Service Type	Weighting	Periodic Evaluation Score(s)					Weighted Score
			PE #1	PE #2 (if app)	PE #3 (if app)	PE #4 (if app)	Average PE Score	
Crater Lake Lodge	Lodging – Midscale	3 - High	3				3.0	9.0
Crater Lake Lodge - Front	Food and Beverage – Upscale Casual Dining	3 - High	5				5.0	15.0
Crater Lake Lodge - Kitchen	Food and Beverage – Upscale Casual Dining	3 - High	4				4.0	12.0
Crater Lake Lodge	Employee Dining Rooms	2 - Medium	3				3.0	6.0
Rim Café - Front	Food and Beverage – Quick Service	3 - High	4				4.0	12.0
Rim Café - Kitchen	Food and Beverage – Quick Service	3 - High	3				3.0	9.0
Rim Gift	Retail	2 - Medium	3				3.0	6.0
Rim Dormitory	Employee Housing	2 - Medium	2				2.0	4.0
Annie Creek Restaurant	Food and Beverage – Fast Casual Dining	3 - High	2				2.0	6.0
Annie Creek Gift	Retail	2 - Medium	5				5.0	10.0
Mazama Camper Store	Retail	2 - Medium	4				4.0	8.0
Mazama Fuel Station	Automobile Services	2 - Medium	4				4.0	8.0
Mazama Cabins	Lodging – Basic	3 - High	3				3.0	9.0
Mazama Campgrounds	Campgrounds	3 - High	4				4.0	12.0
Mazama Dormitory and Warehouse	Employee Housing	2 - Medium	2				2.0	4.0

**Use the space below to justify/explain the weighting system adopted in the table above.**

The park weighted services such as food and lodging as our highest priority. Services such as employee accommodations and food, as well as retail were weighted lower, as medium because they were not imperative to meet the basic needs of our visitors. Crater Lake National Park does not identify any of the concessioner services as low because all services provided contribute directly to the visitor experience or employee satisfaction within the park.

**Table 2 Scoring**

Scoring	
<b>OPTIONAL</b> - If you would like to see the operational performance broken by service type, insert all service types evaluated at the concessioner below in the highlighted cells (from 2nd column in table above - only list each service type once)	
Service Type	Average Weighted Score
Automobile Services	4.0

Campgrounds	4.0
Employee Dining Rooms	3.0
Employee Housing	2.0
Food and Beverage – Fast Casual Dining	2.0
Food and Beverage – Quick Service	3.5
Food and Beverage – Upscale Casual Dining	4.5
Lodging – Basic	3.0
Lodging – Midscale	3.0
Retail	4.0

**Operational Performance Score**

**Rating**

<b>68.4</b>
<b>Marginal</b>

Superior = 90 – 100  
Satisfactory = 70 – 89  
Marginal = 50 – 69  
Unsatisfactory = ≤49

**ADDITIONAL NOTES / COMMENTS**

Please see the attached narrative.

**United States Department of the Interior - National Park Service**  
**Form 10-PHP - Public Health Program Evaluation Report**

<b>Park</b>	CRLA	<b>Concessioner DBA</b>	Crater Lake Hospitality
<b>Concessioner Name</b>	Aramark	<b>Year of Operation</b>	2021
<b>Contract Number</b>	CC-CRLA004-18		

**Instructions:**  
 Facility Information: All facilities may not be inspected during the course of the year, however, it will be important to provide documentation on the facility information section to maintain accurate records. Food service operation types include restaurants/cafeterias, snack bars, grocery, pre-packaged, backcountry, vending, temporary, mobile, and other.  
 Inspection Information – Transfer the number of Satisfactory, Marginal, and Unsatisfactory (S, M, U) ratings from the Food Service Sanitation Inspection Report to this section. Calculations for the final score will automatically be made if using the form electronically. Just enter the number of Satisfactory inspections, number of Marginal Inspections, and number of Unsatisfactory Inspections. If the form is being completed manually, multiply the number of inspections in each category (S, M, U) by the following points: Satisfactory = 100, Marginal = 50, Unsatisfactory = 0. Total the number of inspections and the number of points and then, divide the total number of points by the total number of inspections for the final score.  
 Notes:  
 - For detailed instructions on inserting a PDF or other document into this Workbook, refer to the Instructions and TOC tab.  
 - To use Spell Check, hold Ctrl + Shift + S on your keyboard.

**Table 1 Facility Information**

FACILITY INFORMATION			
Facility Type	Number of Facilities	Facility Name(s)	Comments / Notes / Remarks
Restaurants/Cafeteria	3	Lodge EDR, Lodge Restaurant, Annie Creek Restaurant	
Snack Bars	1	Rim Café	
Grocery	1	Mazama Camper Store	
Pre-Packaged			
Bar			
Backcountry			
Temporary (Identify)			
Vending			
Mobile			
Other1	1	Warehouse	
Other2			
Total Number of Facilities:	6		

**ADDITIONAL NOTES / COMMENTS**

CLH failed one inspection (Unsatisfactory) in June 2021 at the Crater Lake Lodge Dining room. There were also several consistent issues across multiple locations in the park, including:

- Sanitary Buckets that no longer had adequate chemical concentrations
- General service and kitchen cleanliness, including dirty serving items, surfaces, and floors
- Individually wrapped TCS food items without proper date markings
- Air gaps on equipment not meeting requirements

For a full list of issues and locations, please see the attached narrative.

There was a marked improvement between the first inspection in June and the second in August.

**Table 2 Inspection Information**

INSPECTION INFORMATION		
<b>Instructions:</b> Fill in the yellow cells below with the number of Public Health inspections that achieved the corresponding rating (e.g. for the first box, enter the number of inspections where the concessioner achieved a "Satisfactory" rating).		
	# Inspections	Points
# Satisfactory	9	900
# Marginal		
# Unsatisfactory	1	0
<b>Total</b>	10	900

**Public Health Score**

**90.0**

**Adjusted Public Health Score**

**84.0**

**Rating**

**Marginal**

Satisfactory = 85 – 100\*  
 Marginal = 50 – 84  
 Unsatisfactory = ≤ 49

*Note: If concessioner received one or more Unsatisfactory inspections, the final public health rating cannot exceed Marginal and the score cannot exceed 84.*

**United States Department of the Interior - National Park Service**  
**Form 10-RMP - Risk Management Program Evaluation Report**

<b>Park:</b> <u>                    CRLA                    </u> <b>Concessioner Name:</b> <u>                    Aramark                    </u> <b>Contract Number:</b> <u>                    CC-CRLA004-18                    </u>	<b>Concessioner DBA:</b> <u>                    Crater Lake Hospitality                    </u> <b>Year of Operation:</b> <u>                    2021                    </u>
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**Instructions:**  
The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

*Notes:*  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Program Area Evaluations**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Risk Management Program (RMP) Scope</b>	1.1	The RMP is documented, and its scope covers the ten risk management elements. Furthermore, the RMP scope addresses the risk management objectives and aspects applicable to the operation, including: <ul style="list-style-type: none"> <li>• legal requirements (Applicable Laws), contract requirements (including requirements contained in Exhibits), and safety best management practices</li> <li>• employee and visitor hazards</li> <li>• operational, facility and natural hazards</li> </ul>	Yes	Remark: CLH submitted a revamped RMP in July 2021 with significant improvements from the previous versions. This version was accepted by the service in November 2021.
	1.2	The RMP establishes a safety policy for the organization. The policy indicates commitment to: <ul style="list-style-type: none"> <li>• compliance with Applicable Laws</li> <li>• providing a safe and healthful environment for employees, park staff and visitors to the extent possible</li> <li>• assigning responsibilities</li> <li>• providing staff and resources</li> <li>• monitoring performance</li> </ul>	Yes	
<b>2. Responsibility and Accountability</b>	2.1	The concessioner identifies a safety and health official, and documents this assignment in the RMP.	Yes	The CLH General Manager is designated as the safety and health official.
	2.2	The concessioner identifies the risk management organizational and staff responsibilities, and documents this structure and assignments in the RMP.	Yes	
	2.3	RMP resources are developed, documented in the RMP, and applied; resources are adequate to execute the program. Resources include: <ul style="list-style-type: none"> <li>• personnel (e.g., number of staff, experience and skills)</li> <li>• facilities and equipment</li> <li>• information, documentation, and data management systems</li> <li>• agreements for support from outside contractors and agencies</li> <li>• training programs for concession personnel</li> </ul>	Yes	
<b>3. Training</b>	3.1	Managers and staff with safety and health responsibilities meet the qualification requirements defined in the contract and RMP. Competency requirements are defined by appropriate education, training, and experience.	Yes	
	3.2	A training plan is developed, documented in the RMP, and executed; and includes: <ul style="list-style-type: none"> <li>• Defined training requirements for the safety officer and other personnel, including requirements to meet Applicable Laws, the contract, and the RMP.</li> <li>• Required training records, such as training materials, schedules, and participant records.</li> </ul>	Yes	
	3.3	The concessioner has conducted and documented all training.	Yes	

<b>4. Documentation and Operational Controls</b>	4.1	RMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws, the contract, and the RMP to ensure safe operations. Some plans and procedures may overlap with those in the EMP. Examples of operating procedures include: <ul style="list-style-type: none"> <li>• procedures for the safe storage and handling of chemicals</li> <li>• procedures for embarking and disembarking visitors</li> <li>• procedures for safe equipment use</li> <li>• procedures for managing wildlife interactions</li> <li>• procedures for cancelling operations due to weather</li> </ul>	Yes	
	4.2	RMP emergency plans and procedures are developed, documented (if applicable), implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws, the contract, and the RMP. Some plans and procedures may overlap with those in the EMP. Emergencies to be addressed include: <ul style="list-style-type: none"> <li>• natural disasters (earthquakes, floods, tornados, hurricanes, etc.)</li> <li>• motor vehicle incidents</li> <li>• medical emergencies (visitors and employees)</li> <li>• fire (structural, motor vehicles, wildfires, etc.)</li> <li>• terrorism and law enforcement activities</li> <li>• accidents and fatalities (visitors and employees within park boundaries)</li> </ul>	Yes	
<b>5. Communications</b>	5.1	The RMP is available to staff and communicated throughout the concession organization so that personnel understand and can effectively implement the RMP.	Yes	
	5.2	The RMP addresses procedures for communicating hazards to visitors. The hazards may include: <ul style="list-style-type: none"> <li>• Activity-related hazards (e.g., white water rafting)</li> <li>• Natural resource-related hazards (e.g., bears)</li> <li>• Facility-related hazards and procedures (e.g., property evacuation maps)</li> </ul>	Yes	
	5.3	Any visitor acknowledgment of risk is approved by the park. Waivers of liability are not used.	Yes	Only waiver or VAR: Snow Shoe Rental Agreement. Approved 12/2021
	5.4	The concessioner's risk emergency plans are coordinated and agreements in place with other applicable parties such as the NPS, other federal, state, or local emergency response agencies.	Yes	
<b>6. Reporting</b>	6.1*	All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided to the NPS in accordance with the contract. Additional plans, reports, and other documentation are submitted to the NPS in accordance with the contract and RMP.	Yes	
	6.2*	Imminent danger and serious incidents are reported to the park in a timely manner in accordance with the contract and RMP.	Yes	Although reporting did occur in 2021, some reports came in late. It should be a focus of CLH for 2022 to make sure all serious incidents, including any injuries, fires, visitor altercations, etc. are reported immediately to the Service.
	6.3	Annual reports include internal, park, and other regulatory agency risk data, and are submitted to the NPS in accordance with the contract and RMP.	N/A	The only annual reporting requirement in the CLH RMP is the Certificate of Vessel Inspection / Stability letter. None was needed this rating period as the boats did not operate.
<b>7. Inspections and Corrective Action</b>	7.1	Safety inspections are conducted as specified in the contract and RMP or as otherwise necessary to effectively manage operations safely. Formal and routine inspections are scheduled, conducted, and documented. The inspections are conducted by qualified personnel as described in the RMP.	Yes	
	7.2*	Imminent danger, serious, and non-serious hazard deficiencies identified by internal or external inspections are analyzed, corrected, or mitigated within the contract or RMP required timeframes. Any deviations from these timeframes are accepted by the park and documented.	Yes	Continuing, serious issues with building alarm systems require a more proactive response from CLH to ensure code compliance and prevent property loss.
<b>8. Hazard Incident Investigations and Abatement</b>	8.1*	Accidents/incidents are responded to in a timely and effective manner.	Yes	
	8.2	An investigation is conducted for every accident/incident. <ul style="list-style-type: none"> <li>• The investigation includes an analysis to determine the cause.</li> <li>• Corrective action is taken to mitigate recurrences of the accident/incident.</li> </ul>	Yes	

<b>9. Management Review</b>	9.1*	The RMP is reviewed at least annually, and updated as necessary. • The RMP review includes analysis of performance in each RMP element area to determine any systemic program failures (particularly failures that resulted in fatal or serious accidents/incidents or imminent danger hazard deficiencies) and non-compliance with Applicable Laws. • Systemic problems are addressed in RMP updates.	Yes	
	9.2	The initial RMP is submitted to the park within the contract specified timeframe for review, and is accepted by the park. Any subsequent documented RMP updates are submitted to the park for review and acceptance.	Yes	A revised RMP was submitted in July 31, 2021 and was accepted by the NPS in November 2021.
<b>10. Other Contract Requirements</b>	10.1	Contract-specific safety and health requirements not otherwise addressed in the RMP standards are met.	No	There are still outstanding requirements related to structural fire protection, including developing a Fire Prevention Plan, registering for the Federal fire-safe list, etc.

\*Special Attention Item

<b>ADDITIONAL NOTES / COMMENTS</b>
Please see the attached narrative.

**Table 2: Scoring**

<b>Scoring</b>			
<b>Program Area</b>	<b>Score (%)</b>	<b>Program Area</b>	<b>Score (%)</b>
1. Risk Management Program (RMP) Scope	100.0%	7. Inspections and Corrective Action	100.0%
2. Responsibility and Accountability	100.0%	8. Hazard Incident Investigations and Abatement	100.0%
3. Training	100.0%	9. Management Review	100.0%
4. Documentation and Operational Controls	100.0%	10. Other Contract Requirements	0.0%
5. Communications	100.0%		
6. Reporting	100.0%		

**Total - All Program Areas**

<b># In Compliance (Yes)</b>	<b># Deficient (No)</b>	<b># Deficient (Special Attention Item)</b>	<b># N/A</b>	<b># Applicable Reqs.</b>
<b>22</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>23</b>

<b>Risk Management Score</b>	<b>95.7</b>	Superior = 90 – 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = ≤49
<b>Adjusted Risk Management Score</b>	<b>95.7</b>	
<b>Rating</b>	<b>Superior</b>	

**Notes:**

- If 1-2 Special Attention Items are not in compliance, the Risk Management Score is adjusted to Marginal and capped at 69.
- If 3+ Special Attention Items are not in compliance, the Risk Management Score is adjusted to Unsatisfactory and capped at 49.

**United States Department of the Interior - National Park Service**  
**Form 10-EMP - Environmental Management Program Evaluation Report**

<b>Park</b>	<u>CRLA</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2021</u>
<b>Contract Number</b>	<u>CC-CRLA004-18</u>		

**Instructions:**

The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

**Notes:**

- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Environmental Management Program (EMP) Scope</b>	1.1	The concessioner's EMP scope (whether documented or undocumented) covers the environmental objectives and environmental management aspects applicable to the operation including: <ul style="list-style-type: none"> <li>legal requirements (Applicable Laws), contract requirements (including requirements contained in Exhibits), and environmental best management practices</li> <li>facilities and operations</li> <li>natural and cultural resources</li> </ul>	Yes	
	1.2**	The EMP is documented.	Yes	A revised EMP was submitted by CLH and accepted by the NPS in November 2021. This version showed significant improvement over previous versions.
	1.3**	The EMP establishes the concessioner's environmental policy. The policy indicates commitment to: <ul style="list-style-type: none"> <li>compliance with Applicable Laws</li> <li>protecting and conserving park resources and human health</li> <li>assigning responsibilities</li> <li>providing staff and resources</li> <li>monitoring performance</li> </ul>	Yes	
<b>2. Responsibility and Accountability</b>	2.1**	The concessioner must identify an environmental officer and/or program manager and document this assignment in the EMP. The environmental officer must meet the contract specified qualifications and requirements defined in the documented EMP.	Yes	Currently identified as the General Manager.
	2.2	The concessioner determines management and staff responsibilities as necessary to effectively manage environmental activities, and describes this structure and these assignments in the documented EMP (if applicable).	Yes	
	2.3	EMP resources are developed, documented in the EMP (if applicable), and applied; resources are adequate to execute the program. Resources include: <ul style="list-style-type: none"> <li>personnel (e.g., number of staff, experience and skills)</li> <li>facilities and equipment</li> <li>information, documentation, and data management systems</li> <li>agreements for support from outside contractors and agencies</li> <li>training programs for concession personnel</li> </ul>	No	Although CLH is actively working on establishing its environmental program, it was not developed and documented for 2021. Improvements are being made and the service is looking forward to meaningful improvements in 2022.  One specific recurring issue is the dumpster/trash issue (Rim Dorm), with dumpsters not being covered, trash blowing out of dumpsters, and wildlife accessing dumpsters.
<b>3. Training</b>	3.1	Managers and staff with environmental management responsibilities meet qualification requirements defined in the contract and documented EMP (if applicable). Competency requirements are defined by appropriate education, training, and experience.	Yes	
	3.2	A training plan is developed, documented in the EMP (if applicable), and executed; and includes: <ul style="list-style-type: none"> <li>Defined training requirements for the environmental officer and other personnel, including requirements to meet Applicable Laws, the contract, and the EMP.</li> <li>Required training records, such as training materials, schedules, and participant records.</li> </ul>	Yes	
	3.3	The concessioner has conducted and documented all training.	Yes	



4. Documentation and Operational Controls	4.1	EMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the documented EMP (if applicable). These procedures address requirements in Applicable Laws, the contract, and the EMP to ensure protection of human health and the environment. Some plans and procedures may overlap with those in the RMP. Examples of operating procedures include: <ul style="list-style-type: none"> <li>• procedures for the storage and handling of chemicals</li> <li>• procedures for the management and maintenance of fuel</li> <li>• procedures for pesticide use</li> <li>• procedures for hazardous and solid waste disposal</li> <li>• procedures for weed and pest management</li> <li>• procedures for the protection of cultural and archeological resources</li> </ul>	Yes	
	4.2	EMP emergency plans and procedures for environmental management are developed, documented (if applicable), implemented, maintained, and included or referenced in the documented EMP (if applicable). These plans and procedures address requirements in Applicable Laws, the contract, and the EMP. Some plans and procedures may overlap with those in the RMP. Emergencies to be addressed include: <ul style="list-style-type: none"> <li>• hazardous substance spill response</li> <li>• leaks from fuel storage tanks or other chemical storage areas</li> <li>• storm water contamination</li> </ul>	Yes	
5. Communications	5.1	The EMP is available to staff (if applicable), and communicated throughout the concession organization so that personnel understand and can effectively implement the EMP.	Yes	
	5.2	The EMP addresses procedures for communicating environmental controls and initiatives to visitors. These may include: <ul style="list-style-type: none"> <li>• Handling hazardous materials (e.g., fuel)</li> <li>• Handling waste (e.g., trash)</li> <li>• Natural resource or cultural resource impacts</li> <li>• Pest management (e.g., notification of pests if observed)</li> </ul>	Yes	
	5.3	The concessioner's environmental emergency plans are coordinated and agreements in place with other applicable parties such as the NPS, other federal, state, or local environmental agencies.	Yes	
6. Reporting	6.1*	All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided to the NPS in accordance with the contract. Additional plans, reports, and other documentation are submitted to the NPS in accordance with the contract and documented EMP (if applicable). These may include inventories of hazardous substance and waste streams.	No	CLH has not submitted the following reports: Greenhouse Gas Report, Energy Audit, Solid Waste Audit, Green Restaurant Certifications, Water Conservation Tracking System, US EPA Energy Star Partner Status, and others as noted in the attachment "CC-CRLA004-18 PP P, CFIP, Conservation Measures". CLH is actively working to meet revised due dates for 2022 and beyond.
	6.2*	Notices of any discharges, release or threatened release of hazardous or toxic substance, material or waste are reported in a timely manner to the NPS in accordance with the contract.	N/A	No discharges of hazardous substances were known to have occurred.
	6.3*	Any written, threatened or actual notices of violation of Applicable Law from any environmental regulatory agency are reported in a timely manner to the NPS in accordance with the contract.	N/A	None were reported.
	6.4	The NPS is provided timely written advance notice of, and the opportunity to participate in, communications with regulatory agencies regarding the concessioner's environmental activities in accordance with the concession contract.	N/A	The NPS was not aware of communications with regulatory agencies regarding environmental activities that would have required NPS involvement.
7. Monitoring, Measurement and Corrective Action	7.1	Environmental inspections are completed as required by Applicable Law, the contract, the documented EMP (if applicable), or as otherwise necessary to effectively manage environmental activities.	Yes	
	7.2*	Environmental deficiencies identified by internal or external inspections (e.g., NPS concession environmental audits, etc.) are analyzed, corrected, or mitigated within the timeframes designated by Applicable Law, the contract, documented EMP (if applicable), or inspection report. Any deviations from these timeframes are accepted by the park and documented.	Yes	NPS Concessions environmental audit conducted in 2021 - No substantial issues found.
	7.3	Environmental incidents are responded to in a timely and effective manner to stop, contain, and remediate the incident. Investigations are conducted, and corrective actions are taken to prevent recurrences to the satisfaction of the NPS in accordance with the contract, EMP, and relevant regulations and NPS policies.	Yes	Only a minor spill was reported during 2021.
	7.4***	The EMP is reviewed at least annually, and updated as necessary. <ul style="list-style-type: none"> <li>• The EMP review includes analysis of performance in each EMP element area to determine any systemic program failures (particularly failures that resulted in serious incidents of inspection deficiencies), and non-compliance with Applicable Laws.</li> <li>• Systemic problems are addressed in EMP updates.</li> </ul>	Yes	

	7 5**	The initial EMP is submitted to the park within the contract specified timeframe for review, and is accepted by the park. Any subsequent documented EMP updates are submitted to the park for review and acceptance.	Yes	This year CLH made substantial improvements in their EMP and it was accepted by the NPS. There remain many items for the concessioner to complete and the NPS hopes to see substantial progress in those actions over the next contract year.
<b>8. Other Contract Requirements</b>	8.1	Contract-specific environmental requirements not otherwise addressed in the EMP standards are met.	No	The Concessioner has not completed the energy and water efficiency actions required by the contract and the EMP. See attachment "CC-CRLA004-18 PP P, CF P, Conservation Measures" for more information.

\* indicates a Special Attention Item

\*\* indicates item is not applicable to Cat III contracts

ADDITIONAL NOTES / COMMENTS
Please see the attached narrative.

**Table 2: Scoring**

Scoring				
Program Area	Score (%)	Program Area	Score (%)	
1. Environmental Management Program (EMP) Scope	100.0%	6. Reporting	0 0%	
2. Responsibility and Accountability	66.7%	7. Monitoring, Measurement and Corrective Action	100.0%	
3. Training	100.0%	8. Other Contract Requirements	0 0%	
4. Documentation and Operational Controls	100.0%			
5. Communications	100.0%			
<b>Total - All Program Areas</b>				
# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Item)	# N/A	# Applicable Reqs.
18	3	1	3	21
<b>Environmental Management Score</b>	85.7		Superior - 90 - 100 Satisfactory = 70 - 89 Marginal = 50 - 69 Unsatisfactory = ≤49	
<b>Adjusted Environmental Management Score</b>	69.0			
<b>Rating</b>	Marginal			

Notes:  
- If 1-2 Special Attention Items are not in compliance, the Environmental Management Score is adjusted to Marginal and capped at 69.  
- If 3+ Special Attention Items are not in compliance, the Environmental Management Score is adjusted to Unsatisfactory and capped at 49.

**United States Department of the Interior - National Park Service**  
**Form 10-AMP - Asset Management Program Evaluation Report**

<b>Park:</b> <u>CRLA</u>	<b>Concessioner DBA:</b> <u>Crater Lake Hospitality</u>
<b>Concessioner Name:</b> <u>Aramark</u>	<b>Year of Operation:</b> <u>2021</u>
<b>Contract Number:</b> <u>CC-CRLA004-18</u>	

**Instructions**  
The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

**Notes:**  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the Instructions and TOC tab.  
- To use Spell Check, hold **Ctrl + Shift + S** on your keyboard.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes No N/A)	Observation / Comment
<b>1. Annual Concessioner Maintenance Plan (ACMP)</b>	1.1	The ACMP is updated annually and submitted on time.	No	The concessioner has not been submitting an annual plan. One is due every year by January 15th for the coming year. CLH was reminded of these requirements in November 2021 and submitted one for 2022.
	1.2	The ACMP is accurate and complete	No	CLH did not submit a plan for 2021.
	1.3	Projected maintenance expenditures are provided.	Yes	Projected expenditures were only provided for a few projects where project statements were submitted.
<b>2. Inspections</b>	2.1	Inspections were performed on schedule.	Yes	CLH is making a concerted effort to inspect facilities but based on the findings of the Periodic Evaluations, more frequent inspections are needed. CLH has developed an opening inspection list and did ensure timely completion of required inspections (fire systems, backflow preventers, elevator equipment, etc.).
	2.2	Inspection findings were addressed in a timely manner.	No	Generally, it appears that CLH is doing a better job of correcting issues found during internal inspections, however, better documentation is needed so these can be verified and to allow asset management databases to be updated. Overall, however, it appears that a number of issues continue to be missed by CLH staff during inspections or simply go unaddressed.
	2.3	Periodic evaluation facility findings were addressed in a timely manner.	Yes	All remarks and deficiencies are now actively noted and submitted to Facility Fit for work (this did not occur until late 2021). Some items were deferred until spring due to snow. There still needs to be an improvement, however. Extensive woodpecker damage was allowed to occur to several buildings which CLH was aware of but did not repair or take steps to mitigate through park-approved methods.
<b>3. Maintenance</b>		Facility maintenance was performed as scheduled in a timely manner:		
	3.1*	Preventative Maintenance	Yes	CLH appears to be doing preventative maintenance but did not provide a schedule of that work for the year. However, the NPS observed preventative maintenance being completed and their documentation seems to indicate work was performed.
	3.2*	Recurring Maintenance	Yes	CLH did report completing recurring maintenance projects this year including painting and carpet cleaning.
	3.3	Scheduled Repairs	Yes	Limited documentation was provided from CLH.
	3.4	Unscheduled Repairs	Yes	Limited documentation was provided from CLH.
	3.5*	Component Renewal/Replacement	Yes	CLH may be doing these activities but they did not provide planning or accomplishment documentation for 2021. The only component renewal project proposed was the Rim Café Electrical Panel Split.
	3.6*	Deferred Maintenance	No	The Service is not aware of any deferred maintenance projects being completed. There are several deferred maintenance projects (Mazama Cabin roofs, Mazama Dorm roof, Rim Dorm) where no progress has been made. The Lodge roof is noted in the contract as Deferred Maintenance and was not completed during this rating period. The Lodge continues to experience water damage from leaks each year.
<b>4. Reporting</b>		Accurate and complete reports were submitted on time, in the correct format:		
	4.1	Annual Concessioner Maintenance Report	No	No ACMP provided for 2021.
	4.2	Concessioner Project Plan and Report	No	No CPPR provided for 2021.
	4.3	Fixture Replacement Report	N/A	Concessioner waved LSI for Fixtures (Exhibit A, SEC. 15 and 16).
	4.4	Component Renewal Report	No	No report was provided for 2021.
	4.5	Personal Property Report	No	The initial report was submitted for 2022, but the 2021 report due on February 15 was not provided.
<b>5. Computerized Maintenance Systems (CMMS)</b>	5.1	CMMS is maintained and current.	No	Facility Fit implemented Fall 2021, no previous programs were used. The system was not in use during 2021 until November and the system has not been populated with prior work orders.
	5.2	All maintenance actions and associated expenditures requested by the Service were provided in the correct electronic format.	No	Concessioner did not put a CMMS in place until November 2021.
<b>6. Other Contract Requirements</b>	6.1	Contract-specific facility maintenance requirements, not otherwise addressed in the AMP standards, are met.	Yes	

\* Indicates a Special Attention Item

**ADDITIONAL NOTES / COMMENTS**

There are several concerns with ongoing maintenance that the service has documented throughout the year. During several PEs, it was found that regular maintenance and inspection duties were not being performed, resulting in the degradation of facilities. Examples of this include several buildings with woodpecker damage (the Natural Resource division provided mitigation options for woodpeckers in the spring of 2021), screens and snow shutter damage around several Mazama Cabin units, several broken/deteriorating benches in the campground, major warping/water damage to the outside of the Rim Dormitory, the failure of the Mazama A Dormitory roof, and water damage and window leakage in Mazama A Dormitory. Ongoing inspections and active repair and maintenance are highly recommended to CLH, to maintain all facilities and prevent long-term, costly building damage and maintain safe environments for visitors and staff.

**Table 4: Scoring**

<b>Scoring</b>			
Program Area	Score (%)	Program Area	Score (%)
1. Annual Concessioner Maintenance Plan (ACMP)	33.3%	5. Computerized Maintenance Systems (CMMS)	0.0%

2. Inspections	66.7%	6. Other Contract Requirements	100.0%
3. Maintenance	83.3%		
4. Reporting	0.0%		
<b>Total - All Program Areas</b>			
<b># In Compliance (Yes)</b>	<b># Deficient (No)</b>	<b># Deficient (Special Attention Items)</b>	<b># N/A</b>
9	10	1	1
<b>Asset Management Score</b>	47.4		
<b>Adjusted Asset Management Score</b>	47.4		
<b>Rating</b>	Unsatisfactory		
<small>           Superior 90 – 100            Satisfactory 70 – 89            Marginal 50 – 69            Unsatisfactory &lt;49         </small>			
<small>           Notes:            - If 1-2 Special Attention Items are not in compliance, the Asset Management Score is adjusted to Marginal and capped at 69.            - If 3+ Special Attention Items are not in compliance, the Asset Management Score is adjusted to Unsatisfactory and capped at 49.         </small>			

**UNITED STATES DEPARTMENT OF THE INTERIOR – NATIONAL PARK SERVICE  
Crater Lake National Park  
Aramark d/b/a Crater Lake Hospitality (CLH)**

**CC-CRLA004-18  
2021 Annual Overall Rating Narratives**

**CFIP/PPIP/Construction/Repair and Maintenance Reserve or Rehab Projects**

Crater Lake Hospitality has not met the contract completion times for all the CFIP and PPIP projects required in the contract. CLH reports being in the design phase on 2 of the 4 CFIP projects: the Mazama Camper Store Improvements and the Rim Dorm rehabilitation. Proposals for these projects have been previously provided to the NPS, however, both were returned as incomplete due to a lack of alignment with the project requirements set in the contract. Although CLH is actively working on both projects, both the original completion date from the contract and the extended completion dates mutually agreed on by both parties due to the COVID-19 pandemic were missed.

There are still 2 other projects that are required by the contract that have not been completed: Annie Creek Restaurant Improvements and the Rim Café Building Improvements (no work has been completed on the second floor). These projects were all originally expected to be completed by the end of 2020; all were subsequently extended due to the COVID-19 pandemic. Despite this extension, these projects are still not completed.

Many of the projects listed above also have FF&E investments that have yet to be made as required in the contract's PPIP. In addition, the Crater Lake Lodge Lobby rehabilitation has not been completed.

Another PPIP project the Service is also looking forward to is the fabrication of three new tour boats to replace the boats that are currently stored in the boathouse on Wizard Island. Aramark Regional Manager (b) (6) has been working with the boat fabrication company to make sure the specs for these boats will be compatible with the docking situations on the lake, both now and in the future when the Cleetwood Cove Marina project is completed. This project is ongoing, but it should be noted that this project is currently a year overdue from an extended completion deadline.

The GM for Crater Lake Hospitality, (b) (6) is actively working on all of these projects to make sure they are completed in a timely manner as of 2021. We appreciate the effort CLH has put in over the last 12 months to understand the project approval process and expectations laid out by the NPS in the concession contract. We look forward to seeing all of these projects completed in a thoughtful, enduring manner and are excited to see the proposals CLH provides.

CLH completed the design and solicited a contractor to complete the Repair and Maintenance Reserve project to replace the Crater Lake Lodge Roof. The lodge roof will be replaced in the spring of 2022 and will help prevent future water damage to the building occurs every winter. They also completed some smaller projects in 2021, including an electrical split in the Rim Café building in order to bring the building up to code.

In March of 2022, Crater Lake Hospitality was presented with a letter outlining all of the projects and upgrade requirements that were outlined in the contract that are currently overdue. We look forward to working through this list and creating a plan with CLH in order to get these projects and requirements completed in 2022 and in the future to make sure CLH is meeting all of its contractual obligations.

### **Risk Management**

- Risk Management plan submitted in August 2021, accepted by the service in November 2021
- Emergency Response Plan also submitted in August of 2021, accepted by the service in November 2021
- CLH participated in Wildland Fire coordination meeting in June 2021 with NPS management team, VRP and Fire staff. Evacuation routes were discussed and added to CLH's Emergency Response Plan. Coordination for evacuation procedures were discussed to make sure plans for both Crater Lake hospitality and the NPS aligned. Plans to have another pre-fire season meeting have been discussed for 2022.
- Incidences:
  - o 3 minor employee injuries or sicknesses requiring transportation to Sky Lakes Medical Center, 2 by ambulance. All incidences reported to NPS via dispatch calls and followed up with an incident email from GM
  - o 1 grease fire at Annie Creek Restaurant was reported the following day. Fire suppression systems were not triggered, but CLH was reminded that even small fires need to be reported to NPS ASAP.
  - o 1 incident of power loss resulted in the hood cleaning system misfiring and a small flood in the Lodge Kitchen. NPS was on scene and CLH cleaned up the incident immediately.
- Fire alarms:
  - o Alarms have been triggered in several buildings throughout the year. Although these systems are older, monitoring should be improved, and a more proactive approach will help lower the number of alarms and the need for NPS response in 2022.
  - o Fire alarm was found in Supervisory mode at Rim Café twice after the elevator was inspected in August (as noted on the Rim Café PE). CLH should be checking the system every time it is manipulated to make sure it is set back to active mode, for life and safety of employees and visitors alike.

- The Rim Café was closed due to Fire Alarm system issues on April 12. CLH had their contractor correct the issue, but did not notify the NPS the problem was resolved.
- The Lodge Fire Alarm was placed in supervisory mode for several days in October after a contractor visit cause multiple trouble alarms. The NPS was not notified and the alarm would likely have remained offline if the NPS had not discovered the issue while in the building on an unrelated matter.

Overall, Crater Lake Hospitality has improved its Risk Management Plan and Emergency Response Plan significantly in 2022. With both documents now in place and the RMP accepted by the service, CLH now has a basis to work from if any emergencies happen throughout the rest of the contract. This is a huge step forward for CLH and the NPS is glad to have these steps completed so they can be improved upon in the future.

Communication between CLH and the NPS has improved dramatically in 2021 as well, with both parties working together to make sure actions are coordinated and vital information is shared to keep our community safe. When issues were identified with how CLH staff responded to and reported injuries, CLH management updated their procedures and retrained staff. Although we recognize that these procedures and documents are ever-evolving and will always have room for improvement, the NPS hopes we can continue this trend to make sure our community is working together as a whole to deal with ever-evolving large-scale threats to our park.

### **Environmental Management**

- The NPS Commercial Services Program conducted an Environmental Audit in August 2021. The audit team visited all of Crater Lake hospitality's assigned buildings, including Wizard Island, to inspect environmental compliance of all operations. Overall, 15 findings were noted (0 priority 1, 12 priority 2, 3 priority 3). After receiving the Corrective Action Tracker from the Auditors, CLH immediately began correcting issues and establishing new practices, closing 10 of the findings in the first 30 days. As of now, 5 findings remain open but due dates for those findings are in June due to access issues to locations like Cleetwood trail and the boat house on Wizard Island. Items, inspections, and corrective actions are planned for each of these findings to hopefully be closed by summer.
- Environmental Management Plan submitted in August 2021, accepted by the service in November 2021
- The NPS Concessions team has been working closely with CLH to complete environmental projects that were established and required by the contract in 2018. Although CLH has been working to complete these requirements, many are still outstanding as of now. New due dates for several environmental certifications and plans were pushed to late 2022 and beyond. These adjustments were agreed to by both the NPS and CLH. The NPS submitted a table as a tracking sheet to consolidate all remaining environmental reports and fixture/equipment upgrades that remain to be completed with new due dates included. Please see the attachment following this narrative.

- CLH undertook work in 2021 to recycle all readily accepted materials, to properly dispose of the backlog of batteries and light ballasts, and to set an alternative goal for reduction of waste.

## **Public Health**

### **Public Health Facility Inspections**

The office of Public Health conducted 2 rounds of inspections in 2021, the first in June and the second in August. Overall, the facilities that were inspected were well maintained and clean. However, there were some elements of the health code that CLH struggled to meet, and this led to one Unsatisfactory rating at the Crater Lake Lodge main dining room kitchen in June. Throughout the complex, the main issues that were noted by public health during both inspections were:

- Sanitizer buckets: Several sanitizer buckets were found at multiple locations (Lodge kitchen, lodge EDR) that had either been sitting too long or had sat with a rag in the liquid, leading to the sanitation chemicals becoming too diluted.
- General serving and kitchen area cleanliness including dirty bowls, plates, and trays, soda/beer dispenser nozzles, and preparation equipment (lodge kitchen, Rim Café).
- Time as a temperature control was not being maintained on the Lodge buffet line, items were being double stacked preventing them from staying hot/cool enough to maintain temperature.
- Individually wrapped TCS food items without date markings (Lodge kitchen, Lodge EDR, Mazama Camper Store)
- Non-continuous food cooking practices were found in the Lodge kitchen, specifically the kitchen putting grill marks on the fish dishes and then cooling them without fully cooking the meat.
- Employee Drinks were found on a shelf above salt and pepper shakers in the lodge kitchen area (this violation was immediately corrected during inspection).
- Food Debris and spilled items found on floors and under cabinets (Lodge Kitchen, Lodge EDR, Mazama Camper Store, Rim Café).
- Wet stacking of Glasses and (Lodge kitchen).
- Items past "Use by Date" for sale (Mazama Camper Store).
- Food found being stored in unsanitary environments (Rim Café).
- Air gap not meeting the minimum requirements for drains (Lodge EDR, Lodge Kitchen, Annie Creek Restaurant).

During the second inspection in August, several of the issues present in June had been corrected at all locations and the Lodge Kitchen received a Satisfactory grade. It should be noted, however, that there were several locations that struggled with food debris on the floor and under cabinets during both inspections. Employees should be regularly sweeping under cabinets/shelves/equipment to make sure cleanliness is maintained.



- **Possible Norovirus outbreak 2021**

In June of 2021, Crater Lake Hospitality had several employees come down with a stomach bug that seemed to be spreading through the employees working at Mazama Village. Crater Lake hospitality informed the Service immediately, who subsequently notified public health. CLH implemented a version of their COVID-19 response plan and isolated employees who were sick as well as those who had close contact for monitoring, and all affected employees were excluded from work for at least 72 hours or 24 hours after the alleviation of symptoms (per public health guidance). Public health also requested employees showing symptoms to submit lab samples for analysis to determine if the illness was Norovirus or something else.

CLH did a great job containing this outbreak and utilizing the resources it had already set up for Covid to avoid a larger outbreak of this bug. Their quick response prevented this situation from growing out of control and it did not negatively impact any facilities or visitor services. They also assisted the NPS in attempting to identify the illness, however, the cause was never determined.

- **COVID-19**

Crater Lake Hospitality did not provide services during the winter of 2020-2021 due to the COVID-19 pandemic. In May of 2021, CLH provided a COVID Response Plan to the service to show how they would manage guest services in 2021 while maintaining safety measures to prevent outbreaks both for their staff and visitors. Testing schedules were implemented for employees, and procedures were adapted as new guidance was provided by the CDC. Vaccination requirements were implemented for all CLH employees, per their own internal policies, once vaccinations were available to the general public. During 2021, CLH had 3 employees test positive for COVID-19. CLH isolated these individuals and quarantined closed contacts. As a result, they did not experience additional cases and were able to maintain their operations. They worked closely with the service to maintain updated masking guidance, even when State and Federal policies were not aligned.

**Asset Management**

During this rating period, Crater Lake Hospitality staff continued to show a commitment towards proactive management of their assigned assets. Due to the issues experienced during facility openings last year, the CLH team spent considerable effort ensuring all building systems were safe and operational prior to opening. This effort was noted by NPS staff as all buildings were found ready for occupancy during pre-opening inspections, with only minor issues needing to be addressed.

It was also clear the CLH had learned the lessons from system failures in previous winters. Winter staff were directed to complete system checks in all unoccupied buildings and these checks were documented on logs. In the Crater Lake Lodge, Maintenance Manager Roger Kean purchased dozens of analog thermometers and placed them throughout the building in order to identify and rectify cold spots. They also moved their Metasys HVAC system monitoring computer to the IT room where it is on back-up generator power, so they could continue to

monitor Lodge temperatures during power outages. Routine maintenance projects are also undertaken over the winter to address preventive and routine maintenance needs. This winter, CLH maintenance staff cleaned sink traps and drain lines in all guest rooms to reduce issues experienced last season.

While the NPS observes the improvements in facility maintenance, it is difficult to quantify as planning and documentation continue to be an issue for CLH. In 2021 no Annual Concessioner Maintenance Plan was submitted which would have identified projects well in advance to ensure proper prioritization, thorough planning, and realistic scheduling. The required Computerized Maintenance Management System (CMMS) to track work was not placed into service until November of 2021. There is now a backlog of data to enter into this system (FacilityFit) and some technical challenges to work out in order to import it into the National Park Services' Facility Maintenance Management System. It is critical to document when buildings should and do receive periodic maintenance and to update the operational manuals when new parts or systems are installed.

We will note that a Concessioner Maintenance Plan and Report (CMPR) and Concessioner Project Plan and Report (CPPR) was submitted to the Service in December 2021 for the 2022 calendar year.

A persistent issue with CLH is project proposals continue to be submitted late and without the level of detail requested by the NPS in order to make compliance decisions. This is particularly a concern for the CFIP projects that require elevated levels of review and approval. Other projects have had repeated change requests after approval for items that should have been identified during project development, indicating a lack of initial planning (Viasat). And in at least one case this year, a project was completed without NPS approval (Rim Café Kitchen Redesign electrical work). Project proposals should be thought out well in advance and provide a higher level of detail to allow the NPS to conduct complete and efficient compliance reviews.

The efforts to improve communication for operations and employees is appreciated. The Viasat project seeks to increase bandwidth in the Mazama area and CLH has indicated it is also considering acquiring Starlink services.

There are also some projects that have not been completed that are part of CLH's obligation to maintain their assigned facilities. Projects like repairing the roof on the Mazama Dorms and replacing several outdoor lights at the same dorm to improve fire safety have yet to be completed despite the service requesting these projects become a priority to protect both life and safety of their employees, as well as protect the property from damage from the elements.

Throughout the summer season, it was also noted that several buildings had damage from wildlife, most notably woodpeckers. This damage was noted as deficiencies on several buildings, including Annie creek and the Mazama Dorms. CLH has put an effort into repairing this damage, however it should be noted that the inspection and maintenance of all assigned buildings should be constant throughout the year in order to prevent this kind of damage from

developing to the level it has. The Service has provided guidance to CLH to deter the birds from damaging the buildings and we look forward to seeing the efficacy of these deterrents in the 2022 summer season.

**Annual Visitor Use Statistics/Utilization Data**

Service/Facility	2019 Customers	2020 Customers	2021 Customers	Percent Change over...	
				2019	2020
Concessioner Lodging	(b) (4)				
Mazama Campground					
Boat Tours					
Overall Visitation					

Park visitation was 647,751 in 2021, down 3.4% from 2020 and down 8% from 2019. Although visitation dropped significantly, the use of concessioner facilities, most notably overnight accommodations, did grow quite a bit in the last 2 years. Of course, closures of facilities due to COVID-19 and wildfire closures must be considered in these numbers as well.

**Problems/Issues and Resolution**

Once again this season, Aramark’s Central Reservations were not taking Advanced Reservations. The Service was made aware of this in July, when it received visitor complaints. Once CLH was made aware of the issue, it was quickly resolved.

The Service received a complaint this season that entry was denied to a service animal. While the NPS never substantiated the claim, CLH responded by retraining staff to ensure they understood the policy, and how to handle confrontations with individuals bringing non-service animals into facilities.

Early in the winter season, there were issues concerning the communication about weather-related closures of Munson Valley Drive to Rim Village. This provided an opportunity to improve communication surrounding emergent issues and to clarify how issues are communicated within each organization. As the season progressed, both CLH and NPS ensured that accurate and timely information was received and there were no further issues.

Throughout the summer and into the fall, as periodic evaluations were being completed, it was discovered that the Operating Plan within the contract that specified exemptions/additions for the evaluations no longer lined up with the updated Periodic Evaluation forms as the standards themselves had recently been updated. This issue was addressed with a mutual effort from both the Service and CLH to make sure all applicable standard alterations were correct and relevant to the new forms. The Service and CLH also took this opportunity to review the

Operating Plan and discuss any discrepancies or changes that need to be made. The Operating Plan was amended, signed, and sent to Aramark in November 2021.

### **Future Plans for Concession Operations**

As part of the 2020 Annual Overall Rating, the Service requested that progress be made on several contract requirements. The requested items, along with the status of each, are as follows:

1. Re-submit a Risk Management Plan that fully addresses the scope of the operations at Crater Lake no later than August 1, 2021. (Exhibit B: Operating Plan, B-15).
  - The RMP was submitted in July 2021 and subsequently accepted by the Service. CLH is expected to document full implementation of the plan during 2022.
2. Submit a schedule outlining how the Environmental Management Program Plan will be implemented on-site no later than July 1, 2021. (Exhibit B: Operating Plan, B-15)
  - An EMP meeting the minimum contract requirements was received on June 28, 2021, and subsequently was accepted by the Service. CLH is expected to document full implementation of the plan during 2022. We note that a target was to have an environmental manager in place by March 1. We note that this goal was not met but hope that the position will be filled this year.
3. Implement programs to reduce solid waste generation and improve storage, collection, and disposal procedures, as outlined in the Maintenance Plan (Exhibit H: Maintenance Plan, H-16). Work with contracted waste hauler to begin recycling all readily accepted materials no later than August 1, 2021. Implement the Zero Landfill Initiative and work towards 75% reduction of waste in 2021 or propose an alternative goal with a detailed justification if currently recycling market conditions and pandemic concerns make the contract goal unobtainable.
  - CLH worked with their waste hauler to begin recycling all readily accepted materials. They also implemented programs to divert waste streams specific to their operations including kitchen gloves and unused single-use soaps and shampoos from lodging. While they did not make significant progress towards increasing their diversion rates, they did establish alternative goals in their EMP. The new goals were modest, and we hope to see continual improvement.
4. Implement programs to improve water and energy efficiency across the operation, as outlined in the Maintenance Plan (Exhibit H: Maintenance Plan, H-16). Submit a schedule for the development of a Water Conservation Management Plan that identifies the physical change initiatives, operational changes, continuous search for new

technologies, employee engagement, and annual conservation goals of the concessioner by August 6, 2021.

- This item was not completed.
5. Prepare an Annual Concessioner Maintenance Plan and Report (Exhibit H: Maintenance Plan, H-19) to identify projected maintenance activities for 2022 and beyond and submit to the park for review and approval by December 31, 2021. Work with the NPS to establish a schedule for submission of Project Statements well in advance of planned work to allow sufficient time for review and approval.
    - CLH submitted the ACMP on December 15, 2021. The plan is rudimentary but does focus on contract-required maintenance activities. The next step is to ensure that adequate planning is completed towards implementing the projects listed.
  6. Develop, implement and administer the Computerized Maintenance Management System (Exhibit H: Maintenance Plan, H-3) and begin using it to track the condition and work associated with concession facilities by the end of 2021.
    - A CMMS system, FacilityFit, was brought into service in November 2021.
  7. Prepare a Concessioner Project Plan and Report (Exhibit H: Maintenance Plan, H-19) to identify new construction, Major Rehabilitation, and Component Renewal projects scheduled for 2021 and beyond and submit to the park for review and approval by August 31, 2021.
    - The plan was received on December 15, 2021.

## **2022 Focus Areas**

- New due dates for Energy and Water Conservation and Solid Waste Reduction Measures (Table follows this narrative).
  - The NPS is excited to see CLH begin closing out the sizable list of environmental contract compliance issues. Crater Lake Hospitality is asked to keep the NPS apprised of their progress so items can be removed as they are completed.
- COVID plan for 2022 and beyond
  - With COVID-19 seemingly on a downswing and with more understanding about how the disease spreads and affects operations at Crater Lake, Crater Lake Hospitality and the NPS are hopeful that 2022 will bring the operation closer to “the new normal”. Housing policies have been released by the NPS allowing for full occupancy housing (with vaccination requirements and isolation policies in

place), allowing CLH to have the ability to hire a full staff and have boat tours available for the summer. CLH will still submit a COVID Operations Plan for 2022 for Spring Operations, Summer Operations and Housing with contingency plans should cases rise, and with policies in place to protect both employees and visitors from the disease.

- Projects slated for completion in 2022
  - o The NPS is expecting to see project proposals for both the Mazama Camper Store and Rim Dormitory to be reviewed in 2022, hopefully leading to project initiation.
  - o The lodge roof replacement is slated to start on April 1<sup>st</sup> and continue through July 2022. The NPS is excited to have this project completed and hopefully the winter water damage issues that have been consistent for many years will be mitigated with this project.
- Boat tour resumption and new boat plans. Boat house improvements.
  - o Boat tours have been tentatively approved to run for 2022, barring any hiring issues with boat captains or any issues with the boats after having sat unused for 2 years. CLH has continued its progress with fabricating the new boats that should be ready to run in the next few years. The NPS is excited to see what CLH provides for future visitors to the lake.
- Additionally, we hope to see improvements in the areas of Operational Performance and Public Health continue as CLH managers continue to refine these operations based on lessons learned over the past three years. Priorities should be guided by contractual requirements and the results of this AOR, with input from NPS concession managers.
- Although the concessioner is also required to provide lodging, food and beverage, and retail services at the Chateau in Oregon Caves National Monument, these services were not provided in 2021 as the Chateau was closed due to an ongoing NPS project to rehabilitate the historic structure to meet life, health, safety and accessibility standards. The Chateau will remain closed through 2022.

### **Accomplishments or Outstanding Work**

Crater Lake Hospitality put forward a thoughtful COVID-19 response plan that considered how to provide the broadest range of visitor services while ensuring the safety of employees and guests. One accomplishment we wish to recognize was securing a vaccination clinic for CLH staff, which CLH management opened up to NPS staff. This effort was greatly appreciated.

Throughout 2021 CLH experienced a number of staffing and supplier issues. It is notable how well the concession team responded to these challenges with flexibility and creativity. Food and Beverage staff never knew what Sysco would actually deliver, so they had to develop menus based on what was provided. Lodge management had to suspend breakfast service for a time while they recruited new employees, but they put together an a la carte menu to ensure Lodge guests had dining options. Then they quickly figured out a modified hot breakfast service that could operate with reduced staffing. Whatever the challenge, CLH always attempted to provide the best service possible with the circumstances they were dealt.

Another accomplishment that the park staff wishes to express appreciation for is CLH working with their payment processors to accept WEX Fleet gas cards at the Mazama Village. This fleet card is used by many Federal agencies, in addition to private fleets. In August 2020, Crater Lake National Park had an issue with its fuel contract which resulted in delayed fuel delivery. CLH was asked if they could accept WEX and within a few days updated their payment system. Crater Lake staff then fueled their vehicles at the Camper Store location rather than having to drive 40 miles into town just to fuel vehicles. We thank the CLH staff for making this happen.

One improvement made at the lodge this year was the installation of shower plumbing to the clawfoot tubs. There are 8 of these tubs in Lodge rooms. When many guests very much enjoy soaking in these classic baths, there are also occasional complaints received about the lack of showerheads. CLH upgraded the non-historic plumbing fixtures to add a shower diverter valve and added a ceiling-hung shower curtain, to allow guests to take showers while leaving the classic clawfoot tubs in place.

We would also like to acknowledge the contributions of the local CLH management team:

(b) (6) was the Maintenance Supervisor for Crater Lake Hospitality since 2019. (b) (6) was an integral part of the maintenance of all CLH assigned assets as well as a huge resource with a ton of institutional knowledge of the property. (b) (6) helped plan and complete everyday maintenance needs as well as larger projects throughout his time at Crater Lake. (b) (6) has moved on, but before he left, he made an effort to compile binders and information to help his replacement transition smoothly into the complex job. We will miss (b) (6) and we would like to express our appreciation for his contributions to Crater Lake.

(b) (6), the General Manager of Crater Lake hospitality, came into her position after a year working as the Operations Manager for Mazama Village. When she received her promotion to General Manager in 2021, she immediately started working closely with the NPS to make sure CLH was in compliance with the contract. Although there have been many issues that needed to be corrected, she has worked extremely hard to make sure all needs from the Service have been met and she continues to work hard to complete all remaining outstanding requirements that are required by the contract. She has completed any and all requests asked of her with understanding and urgency, and the NPS appreciates all of her efforts.

Concession Contract CC-CRLA004-18 Energy and Water Conservation and Solid Waste Reduction Measures						
Category	Contract Requirements	Contract Due Date	Completed	Element of a Better Offer	Location	New Due Date
Energy Efficiency	Replace all steam cookers in all kitchens with Energy Star rated models	Within one year of the Contract effective date	Completed	Yes	pg H-8	No dedicated steamers on property
Energy Efficiency	Concessioner must conduct an energy use audit to establish baseline energy use	10/31/2020	Not to the Service's knowledge	Yes	pg H-17	10/31/2022
Energy Efficiency	Concessioner must install remotely monitored energy sensors in relevant Crater Lake facilities (35 in total)	10/31/2020	Not to the Service's knowledge	Yes	pg H-17	10/31/2023
Energy Efficiency	The Concessioner must provide an annual Greenhouse Gas Emissions Report to the Service based on the international ISO 14065-1, summarizing all sources and sinks of greenhouse gas emissions, all physical changes implemented to achieve energy reduction during that reporting year, and estimated energy saved based on actual use from energy use monitoring systems	Annually by January 31	No report provided to Service As of 2/23/22 - Concessioner given additional time to work with contractor to establish initial report No template available from Aramark	Yes	pg H-17	First report to be delivered 1/31/2022
Exterior Lighting	Replace all incandescent, fluorescent and compact fluorescent lights with energy efficient LED lighting systems that meet Energy Star criteria	Within one year of the Contract effective date	75% compliance, new fixtures needed for Mazama Dorm lights and Rim dorm needs to be converted	Yes	pg H-6	12/31/2022
Interior Lighting	Replace all incandescent, fluorescent and compact fluorescent lights with energy efficient LED lighting systems that meet Energy Star criteria	Within one year of the Contract effective date	90% compliance, final conversions to be completed with Mazama Camper Store Project	Yes	pg H-6	12/31/2022
Solid Waste Reduction	Install an organic digester (Envipure or equivalent) at Annie Creek restaurant, Rim Village café, and Chateau kitchen	Within one year of the Contract effective date Plan for installation within 90 days of Contract effective date	Not to the Service's knowledge	Yes	pg H-8	To be determined though discussion with NPS - impacts to wastewater system are a concern Process should be started 2022
Solid Waste Reduction	The Concessioner must implement a "Zero landfill" program	Within one year after the Contract effective date	Not to the Service's knowledge	Yes	pg H-16	Implement in 2022, full implementation by May 2023
Solid Waste Reduction	Conduct a solid waste audit	7/31/2019	Not to the Service's knowledge	Yes		10/31/2022
Solid Waste Reduction	Reduce solid waste disposal by 75%	Within one year after the Contract effective date	Not to the Service's knowledge	Yes		Increase recycling to 20% by September 30, 2022, 75% by October 31, 2023
Solid Waste Reduction	Annual Waste Stream Report	Annually by January 31	No report provided to Service			First report due 1/31/2022
Water and Energy Efficiency	Replace all ice machines with properly-sized, Energy Star rated, air cooled ice machines that use less than 50 gallons of water per 100 pounds of ice produced	Within one year of the Contract effective date	4 ice machines being replaced in 2022 to meet this requirement	Yes	pg H-8	12/31/2022
Water and Energy Efficiency	Install in all employee housing washing machines that meet WaterSense water and Energy Star energy conservation criteria	Within one year of the Contract effective date	Yes	Yes	pg H-9	N/A



Water and Energy Efficiency	Achieve U S EPA "Energy Star Partner" Status for Crater Lake Operations	Within three years of the Contract effective date	Not to the Service's knowledge	Yes		Enroll by July 1, 2022, gain status by May 1, 2025
Water and Energy Efficiency	Develop and provide to the Service, a water conservation management plan that identifies the physical change initiatives, operational changes, continuous search for new technologies, employee engagement, and annual conservation goals The plan must include a water footprint management system based on international standard ISO 14046 the Concessions must use the U S EPA/U S DOE water savings calculator and report results to the Service by January 31 annually	Plan due within 120 days of the Contract effective date, reports due annually by January 31st	No report provided to Service	Yes	pg H-16	Plan by 5/1/2022, First report due January 31, 2023
Water Efficiency	Install dishwashing machines that meet or exceed WaterSense conservation criteria in Annie Creek restaurant, Rim Village Café, and Chateau Kitchen	Within one year of the Contract effective date	Yes	Yes	pg H-8	N/A
Water Efficiency	Replace Camper Store laundry machines with the highest Water Sense rated water use efficient units sized for the anticipated loading per wash	Within one year of the Contract effective date	Not to the Service's knowledge	Yes	pg H-9	12/31/2022
Water Efficiency	Install low-flow WaterSense pre-rinse spray valves in every kitchen and food preparation area	Within one year of the Contract effective date	Yes	Yes	pg H-9	N/A
Water Efficiency	Replace all fixtures in public restrooms (including urinals), food service areas, employee housing, campground comfort stations, shower facility and maintenance areas with low flow WaterSense compliant fixtures	Within one year of the Contract effective date	Complete except Mazama Camper Store and Rim dorm, to be addressed with renovations	Yes	pg H-9	12/31/2022
Water Efficiency	Concessioner must conduct a comprehensive leak inspection every year prior to the main operating season to identify all leaks and make repairs prior to opening	Annual	yes	Yes	pg H-9	Annually in the spring as facilities open for the season
Water Efficiency	Replace all Crater Lake Lodge and Mazama Village Cabin guest room shower heads, bathtub faucets, bathroom sink faucets, and toilets with low flow WaterSense compliance fixtures	Within one year of the Contract effective date	Yes	Yes	pg H-13	N/A
Water Efficiency	The Concessioner must conduct a comprehensive water use audit of all assigned buildings at Crater Lake and then document baseline usage to measure water conservation progress	7/31/2019	Not to the Service's knowledge	Yes	pg H-17	10/31/2022
Water Efficiency	The Concessioner must develop and use a computer-based Water Conservation Initiative Monitoring Tracking System, which will document in detail every existing water device removed by manufacturer, including model number and nominal flow rate, and the water conservation (WaterSense) device installed with the same information, including the date of replacement		Not to the Service's knowledge	Yes	pg H-17	10/1/2023
Water Efficiency	The Concession must install remotely monitored water use sensors at each of the ten Mazama Cabin four-plexes, in each public restroom, employee housing dormitories, food service kitchens, Mazama Camper Store laundry and shower, the Mazama Campground comfort stations, and the Chateau (at least 45 sensors across the listed locations) Concession must remotely record total water use on a daily basis for each water flow monitoring device throughout the Contract term		Not to the Service's knowledge	Yes	pg H-17	10/1/2023

Water Efficiency	The Concessioner must provide to the Service by January 31 of each year an Annual Water Conservation Report for the previous year, summarizing in detail all physical changes implement to achieve conservation of water during that reporting year and estimated water saved based on actual use from water-use monitoring systems	Annually by January 31	No report provided to Service as	Yes	pg H-17	1/31/2023
Water Efficiency	The Concessioner must have an active membership in the Green Restaurant Association for third-party verification of its water conservation goals and achieve 3 star certification at all locations by December 31, 2022	12/31/2022	Not to the Service's knowledge	Yes	pg H-17	Enroll by July 1, 2022, complete certification by October 31, 2025
Water Efficiency	Concessioner must move all housekeeping laundry services outside the Area	Within one year of the Contract effective date	Yes	Yes	pg H-17	Completed - laundry sent to AUS in Medford

**United States Department of the Interior - National Park Service**  
**Form 10-AOR - Annual Overall Rating Report**

Year of Operation: 2022

Park: CRLA Contract Term Effective Dates: 11/1/2018 through 10/31/2030  
 Concessioner Name: Aramark Concessioner DBA: Crater Lake Hospitality  
 Contract Number: CC-CRLA004-18

**Table 1: AOR Score**

Category	Scores	Adjusted Scores	Rating
Administrative Compliance (10-ADM)	71.0	69.0	Marginal
Operational Performance (10-OPR)	57.1	57.1	Marginal
Public Health (10-PHP)	87.5	84.0	Marginal
Risk Management (10-RMP)	95.8	69.0	Marginal
Environmental Management (10-EMP)	87.5	87.5	Satisfactory
Asset Management (10-AMP)	63.2	49.0	Unsatisfactory

AOR Score	77.0	Superior = 90 – 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = <49
Adjusted AOR Score	69.0	
Rating	Marginal	

**Notes:**  
 -The final AOR score is the average of all applicable category scores. The Adjusted AOR Score is used for ADM, PHP, RMP and EMP (see Individual pages for details).  
 -If the Concessioner receives an Unsatisfactory on any of the forms, the final AOR score is capped at 69 and final AOR rating can not exceed Marginal.  
 -If the Concessioner receives a Marginal on any of the forms, the final AOR score is capped at 89 and final AOR rating can not exceed Satisfactory.  
 -If a periodic evaluation (10-OPR) has not been completed for the contract during the year of operation, the final AOR score is capped at 89 and final AOR score can not exceed Satisfactory.

**Table 2: Superintendent Approval / Signature**

**Superintendent Approval / Signature**

**Instructions:** The park superintendent has the authority to adjust the final concessioner AOR rating. Please use the space below to enter the final superintendent-approved rating. If the rating has been altered from the calculated rating (shown above), please also include notes to explain why the change occurred. Please see Tab "Instructions and TOC" for instructions on signing AOR.

Superintendent Approved Rating Marginal

**Narrative** (explain reasoning for any changes made by the superintendent)

Superintendent's Signature



Digitally signed by CRAIG ACKERMAN  
 Date: 2023.03.31 13:47:43 -0700

Date

Concessioner Signature  
 (to signify receipt of rating)

(b) (6)

Date

**Table 3: Evaluation Narratives**

**Evaluation Narratives**

**Instructions:** Narrative assessment and comments on the Concession Annual Overall performance for the year are mandatory. Please use the outline below to organize the narratives. Enter "N/A" under outline headers which are not applicable.

If you wish to attach a separate document to this Workbook as supporting materials, please see the instructions located on Tab "Instructions and TOC". Refer to any attachments in the space provided below. Please also use attachments if your text does not fit inside the boxes below.

*Hint: To start a new paragraph in the comments area, hold the ALT key and hit enter twice, then continue typing the next paragraph.*

<b>CFIP / Construction / Repair and Maintenance Reserve or Rehab Projects</b>	See attached narrative document.
<b>Leasehold Surrender Interest / Possessory Interest</b>	No LSI was incurred during the 2022 operating period. The Service is concerned that delays in completing CFIP projects or other major investments (Mazama Service Station Rehabilitation) will lead to increased construction costs and larger LSI balances than were planned for.
<b>Franchise Fees</b>	All Franchise Fee payments were on time in 2022. There was one issue in January of 2022 where handicraft sales were miscalculated and required correction, but all other payments were accurate when submitted.
<b>AFR</b>	The 2021 Annual Financial Report (AFR) was submitted on time and was complete. However, there was missing documentation to support the use of the RMR funds for the year. NPS requested updated invoices for work on the Mazama Cabins in fall 2021. Invoices that were received did not reflect the amount claimed on the AFR for RMR. NPS never received completed documentation for the RMR claims.
<b>Insurance</b>	Certificates of Insurance were requested by the service in March after it was found that the 2021 insurance was not provided. Documents were provided and the 3rd party audit found that CLH was in compliance with coverage requirements.
<b>Risk Management</b>	See attached narrative document.
<b>Environmental Management</b>	See attached narrative document.
<b>Public Health</b>	See attached narrative document.
<b>Asset Management</b>	See attached narrative document.
<b>Administrative Compliance Reporting</b>	See attached narrative document.
<b>Annual Visitor Use Statistics / Utilization Data</b>	See attached narrative document.
<b>Problems / Issues and Resolution</b> (include outstanding problems/issues and intended resolution)	See attached narrative document.
<b>Accomplishments or Outstanding Work</b>	See attached narrative document.
<b>Future Plans for Concession Operation(s)</b>	See attached narrative document.
<b>Visitor Satisfaction</b>	See attached narrative document.

**Final Remarks:**

The Service would like to acknowledge positive accomplishments that occurred during 2022, most notably the return of most contract-required services, including the popular lake boat tours. There were areas of improvement over last year, particularly in the areas of administrative reporting and establishing required plans that have been overdue for years. However, it was evident training on these plans has not fully been implemented due to a number of recurring issues across all program areas evaluated as part of this annual rating. In late 2021, with little movement apparent on a number of critical projects, a letter was issued to CLH outlining the lack of progress on the PPIP, CFIP, and contract-required environmental actions. CLH responded by renewing its commitment to these projects and did make some progress with the acquisition of new tour boats and planning for the renovation of Rim Dormitory. Progress, however, has been slow in part to incomplete project submittals from CLH, but the NPS is hopeful both the new boats will be delivered and Rim Dorm construction may begin in 2023. The Service appreciates the renewed and ongoing efforts to improve the operation, but as noted throughout this rating document, substantial and longstanding issues to meet contract requirements remain. The Service will continue to provide support to CLH in 2023 in making further improvements and building upon successes. The Service hopes CLH will use the feedback in this rating to make the necessary corrections to achieve contract compliance.

**United States Department of the Interior - National Park Service**  
**Form 10-ADM - Administrative Compliance Report**

<b>Park</b>	<u>CRLA</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2022</u>
<b>Contract Number</b>	<u>CC-CRLA004-18</u>		

**Instructions:**  
For each element (row), use the drop-down or type in Column F (yellow) to specify if the element is either 1) in compliance ("Yes"), 2) not in compliance ("No"), or 3) not applicable ("N/A") for the concessioner under evaluation. If the element is either not in compliance or not applicable, use the "Remarks" box at the bottom of the form to provide an explanation.

**Notes:**  
- Elements marked with an asterisk (\*) represent "Special Attention Items." See comments at the bottom of the page for more information on how that affects scoring.  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.  
- For 8.B., use the concessioner's due date for their 2021 Annual Financial Report to complete the evaluation. If the 2021 AFR is not available or another year is used for any reason, please indicate the AFR year in the Remarks section below.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
1. Services and Operations	1.1*	All required services were provided by the Concessioner.	No	Due to the ongoing pandemic, several services were not provided this year as authorized in a "Notification of Changes" letter. Affected services included breakfast service at Annie Creek Restaurant, lunch service at the Lodge Restaurant, laundry in the Camper Store, table service at the Lodge Restaurant, and the use of disposable tableware at Annie Creek Restaurant. The Notification of Changes letter was rescinded on October 9, 2022. However, there were multiple instances where services were not provided for the minimum operating season required by the contract. The NPS did not approve the late opening of the Mazama fuel station, the Mazama Campground, the Cleetwood Cove bathrooms, and the Boat Tours which only operated for an approximately 3-week season.
	1.2*	All services provided by the Concessioner were authorized by the Contract.	Yes	
2. Concessioner Personnel	2.1	The Concessioner established and implemented policies and procedures for pre-employment screening, hiring, training, employment, review of employee conduct, and termination of employees in accordance with the Contract.	No	The concessioner does have corporate policies in place to address these items. During the season, there were reports of unacceptable conduct among employees. Of the serious concerns reported to the NPS, these instances were generally dealt with promptly through Aramark's internal procedures. The NPS does ask the concessioner to reexamine its housing policies. This season the NPS continued to respond to incidents in the employee dorms that required law enforcement intervention. In some reported cases, underage drinking was involved. NPS staff continued to find alcoholic beverages in employee common areas, which is a violation of CLH policies. The NPS would suggest that CLH provide better monitoring of employee conduct in housing and ensure that policies related to resident safety are followed.
	2.2	The Concessioner was in compliance with Applicable Laws relating to employment and employment conditions including those in the Non-Discrimination Exhibit of the Contract.	Yes	
	2.3	The Concessioner developed and implemented appropriate training programs for employees in accordance with the Contract.	No	While training programs were developed, most are developed at a corporate level and do not seem to provide adequate training in site-specific operational requirements due to the frequency that inappropriate behavior of CLH employees re-occurs. Examples include: the use of restricted federal radio frequencies for non-emergent issues, damage to park landscapes and protected plant species, failing to respond appropriately to incidents (reports of medical issues, power outages, etc.), and poor training of front-line staff in addressing negative customer feedback.
3. Legal, Regulatory and	3.1	Has the concessioner received a violation(s) of any Applicable Laws? <b>If no, move to Section 4.</b>	No	
		i. Did the Concessioner inform the park superintendent?		

Policy Compliance		ii. Did the Concessioner rectify the violation(s) in a timely manner?		
		iii. Was the violation resolved and closure documentation submitted to the park?		
4. Concession Facilities and Government Personal Property	4.1	The Concessioner operated only within the Assigned Land and Concession Facilities as identified in the Contract.	Yes	
	4.2	Government personal property assigned to the Concessioner was maintained in good and operable condition, and properly returned to the NPS for disposition if no longer serviceable.	Yes	
5. Construction or Installation of Real Property Improvement	5.1	Any request for leasehold surrender interest was made in accordance with the requirements of the Contract.	N/A	No LSI requests were made for 2022.
	5.2	Is there a Concession Facilities Improvement Program applicable to this rating period? <b>If no, move to Section 6.</b>	Yes	
	5.3	The Concessioner submitted plans and specifications for approval by the Superintendent.	No	Plans were submitted for the Rim Dorm Renovation and Mazama Camper Store Renovation. However, plans for several other CFIP projects are still outstanding.
	5.4	The Concessioner started the project on time.	No	No CFIP or PP P programs have been started on time per the contract or based on extensions provided to the concessioner.
	5.5	The Concessioner completed the project on time.	No	No CFIP or PP P programs have been completed on time per the contract deadlines, or extended deadlines granted to the concessioner.
	5.6	The Concessioner submitted documentation to confirm that expenditures of the program were in accordance with the Contract.	No	While no expenditures have yet been made, one issue in approving the CFIP project is the lack of budget detail to ensure the investment is in accordance with the contract.
6. Tracking and Payment of Required Fees	6.1*	If a maintenance expense is required, the Concessioner expended the minimum amount required by the Contract during this rating period.	N/A	
	6.2*	The Repair and Maintenance Reserve was spent correctly.	Yes	Yes, the Lodge Roof Replacement was the major RMR project completed this rating period.
	6.3*	The Concessioner submitted all required franchise fees and required reports on time, including the monthly franchise fee report.	Yes	
	6.4	If applicable, interest assessed on overdue franchise fee amounts was paid.	N/A	
	6.5	Handicraft sales claimed as exempt from franchise fees were supported by appropriate documentation, e.g. invoices bearing a certification by the supplier that the items were Authentic Native Handicrafts.	No	The NPS discovered that franchise fee exemptions for Native American Handicrafts were claimed for items that were not authentic. The claim (\$480) was found during an audit for the 2021 AFR, and corrected in March 2022 as an additional Franchise Fee (\$57). The classification of the items was updated in the CLH accounting system after the issue was discovered.
7. Indemnification and Insurance	7.1*	The Concessioner provided the superintendent with a current Certificate(s) of Insurance.	Yes	COI's were provided on request on March 24, 2022.
	7.2*	The Certificate(s) of Insurance documented that the Concessioner was compliant with all insurance coverages required in the Contract. This compliance may be determined through a review by a third party consultant.	Yes	
8. Accounting Records and Reports	8.1	If this is the first year of a Contract, the opening balance sheet was submitted as required by the Contract.	N/A	
	8.2*	The Concessioner submitted the Annual Financial Report (AFR) due within this rating period.	Yes	
	8.3*	The Concessioner submitted the AFR on time.	Yes	
	8.4*	The AFR was audited by an independent licensed or certified public accountant, if required.	Yes	
9. Other Reporting Requirements	9.1	The superintendent may require the Concessioner to submit reports and data regarding its performance under the Contract. Some common reporting requirements are listed below.		
		i. Visitor Use Statistics/Operating Reports	Yes	
		ii. Customer Comment Reports	Yes	
		iii. Hours of Operation	Yes	
		iv. Management Listing	Yes	
		v. Inventory of Waste Streams	Yes	
		vi. Employee Handbook	Yes	
		vii. Any additional pertinent reports	Yes	

10. Assignment, Sale or Encumbrance of Interests	10.1	If the concession was sold or transferred during this rating period, the Concessioner fulfilled all obligations stipulated by the Contract.	N/A	
	10.2	If the name of the business has changed in the past year, give new name below:		
11. Sub-concessions	11.1	If there were any agreements with third parties to provide services authorized or required in the Contract, list the services they provided below:		
	11.2*	All sub-concessions were approved by the superintendent.	N/A	
12. Utilities	12.1	List utility services provided by the NPS for the Concessioner (If there are no utilities provided by the NPS, enter N/A):		Water/Sewer
	12.2*	The Concessioner paid for the utility services provided in a timely manner.	Yes	The NPS did not issue utility invoices in a timely manner due to staffing shortages. All invoices were paid on-time once provided.
	12.3*	If a utility add-on was approved, the Concessioner submitted all required reports, including the distribution of add-ons and reconciliation reports.	N/A	
13. Advertising and Promotional Materials	13.1	The Concessioner obtained NPS approval for all promotional material prior to publication or distribution.	Yes	
	13.2	If the Concessioner used the Concessioner Mark, the Concessioner obtained approval prior to using the Mark and followed the guidelines for using the Mark.	Yes	
	13.3	The Concessioner's websites and social media sites contained accurate and relevant information.	No	There were several instances when the concessioner's website was too vague or contained outdated information which caused visitors to be confused and contact the park or concessions directly for clarification. This caused significant frustration with information about boat tours in particular, resulting from infrequent updates and the website containing outdated or contradictory information.
14. Contract Transition	14.1	If the Contract was in transition, the Concessioner managed operations appropriately to achieve an orderly transition of operations and avoided disruption of services, including adhering to the provisions stipulated in Exhibit J "Transition to a New Concessioner."	N/A	
15. Other Requirements	15.1	The Concessioner was in compliance with all terms of the contract, not otherwise addressed in the administrative compliance, service or program-specific reviews.	Yes	

ADDITIONAL NOTES / COMMENTS	
<p>Overall administrative compliance continued to improve during this rating period. The NPS continues to encourage CLH to explore partnerships with local Native American artisans for Handicraft sales since the vendor used by CLH has products that are sourced from outside the region. There should be a focus this year on customer communication and accurate information through both the website as well as by phone. The NPS continued to receive visitor complaints that they were unable to get ahold of CLH employees. The NPS confirmed visitor concerns and personally experienced unanswered calls and full voicemail boxes unable to record messages. Please refer to the attached narrative for additional comments.</p>	

Table 2: Scoring

Scoring			
Program Area	Score (%)	Program Area	Score (%)
1. Services and Operations	50.0%	9. Other Reporting Requirements	100.0%
2. Concessioner Personnel	33.3%	10. Assignment, Sale or Encumbrance of Interests	n/a
3. Legal, Regulatory and Policy Compliance	n/a	11. Special Provisions – Sub-concessions	n/a
4. Concession Facilities and Government Personal Property	100.0%	12. Special Provisions – Utilities	100.0%
5. Construction or Installation of Real Property Improvement	0.0%	13. Advertising and Promotional Materials	66.7%
6. Tracking and Payment of Required Fees	66.7%	14. Contract Transition	n/a
7. Indemnification and Insurance	100.0%	15. Other Requirements	100.0%
8. Accounting Records and Reports	100.0%		

**Total - All Program Areas**

# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Item)	# N/A	# Applicable Requirements
22	9	1	11	31
<b>Administrative Compliance Score</b>		<b>71.0</b>		
<b>Adjusted Administrative Compliance Score</b>		<b>69.0</b>		
<b>Rating</b>		<b>Marginal</b>		
<p><i>Notes:</i></p> <p>1) If 1-2 Special Attention Items are not in compliance, the Administrative Compliance Score is adjusted to Marginal and capped at 69.</p> <p>2) If 3+ Special Attention Items are not in compliance, the Administrative Compliance Score is adjusted to Unsatisfactory and capped at 49.</p>				
<p>Superior = 90 – 100            Satisfactory = 70 – 89            Marginal = 50 – 69            Unsatisfactory = ≤49</p>				






**Operational Performance  
Score**

**57.1**

**Rating**

**Marginal**

Superior = 90 – 100  
Satisfactory = 70 – 89  
Marginal = 50 – 69  
Unsatisfactory = ≤49

**ADDITIONAL NOTES / COMMENTS**

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**United States Department of the Interior - National Park Service**  
**Form 10-PHP - Public Health Program Evaluation Report**

<b>Park</b>	<u>CRLA</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2022</u>
<b>Contract Number</b>	<u>CC-CRLA004-18</u>		

**Instructions:**  
 Facility Information: All facilities may not be inspected during the course of the year, however, it will be important to provide documentation on the facility information section to maintain accurate records. Food service operation types include restaurants/cafeterias, snack bars, grocery, pre-packaged, backcountry, vending, temporary, mobile, and other.

Inspection Information – Transfer the number of Satisfactory, Marginal, and Unsatisfactory (S, M, U) ratings from the Food Service Sanitation Inspection Report to this section. Calculations for the final score will automatically be made if using the form electronically. Just enter the number of Satisfactory inspections, number of Marginal Inspections, and number of Unsatisfactory Inspections. If the form is being completed manually, multiply the number of inspections in each category (S, M, U) by the following points: Satisfactory = 100, Marginal = 50, Unsatisfactory = 0. Total the number of inspections and the number of points and then, divide the total number of points by the total number of inspections for the final score.

*Notes:*  
 - For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
 - To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Facility Information**

FACILITY INFORMATION			
Facility Type	Number of Facilities	Facility Name(s)	Comments / Notes / Remarks
Restaurants/Cafeteria	3	Lodge EDR, Lodge Restaurant, Annie Creek Restaurant	Lodge Restaurant has rated an Unsatisfactory 3 times in the last 4 years.
Snack Bars	1	Rim Café	
Grocery	1	Mazama Camper Store	
Pre-Packaged			
Bar			
Backcountry			
Temporary (Identify)			
Vending			
Mobile			
Other1	1	Warehouse	
Other2			
<b>Total Number of Facilities:</b>	<b>6</b>		

**ADDITIONAL NOTES / COMMENTS**

The Lodge Restaurant has struggled to achieve a satisfactory rating on its first yearly evaluation 3 out of the last 4 years, and the last two years in a row. Common violations center around hot and cold holding, as well as sanitation in the kitchen areas. There were also concerns noted about the preparation of meats including improper thawing of fish and the prime rib cooking process. While improvements were made over the course of the season, food code compliance was a struggle across the CLH food service operations, including at the Annie Creek Restaurant, which has historically received good public health ratings.

**Table 2: Inspection Information**

INSPECTION INFORMATION		
	# Inspections	Points
<b># Satisfactory</b>	10	1000
<b># Marginal</b>	1	50
<b># Unsatisfactory</b>	1	0
<b>Total</b>	12	1050

<b>Public Health Score</b>	<b>87.5</b>	Satisfactory = 85 – 100* Marginal = 50 – 84 Unsatisfactory = ≤ 49
<b>Adjusted Public Health Score</b>	<b>84.0</b>	
<b>Rating</b>	<b>Marginal</b>	

*Note: If concessioner received one or more Unsatisfactory inspections, the final public health rating cannot exceed Marginal and the score cannot exceed 84.*

**United States Department of the Interior - National Park Service**  
**Form 10-RMP - Risk Management Program Evaluation Report**

<b>Park:</b> <u>                    CRLA                    </u> <b>Concessioner Name:</b> <u>                    Aramark                    </u> <b>Contract Number:</b> <u>                    CC-CRLA004-18                    </u>	<b>Concessioner DBA:</b> <u>                    Crater Lake Hospitality                    </u> <b>Year of Operation:</b> <u>                    2022                    </u>
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**Instructions:**  
The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

*Notes:*  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Program Area Evaluations**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Risk Management Program (RMP) Scope</b>	1.1	The RMP is documented, and its scope covers the ten risk management elements. Furthermore, the RMP scope addresses the risk management objectives and aspects applicable to the operation, including: <ul style="list-style-type: none"> <li>• legal requirements (Applicable Laws), contract requirements (including requirements contained in Exhibits), and safety best management practices</li> <li>• employee and visitor hazards</li> <li>• operational, facility and natural hazards</li> </ul>	Yes	
	1.2	The RMP establishes a safety policy for the organization. The policy indicates commitment to: <ul style="list-style-type: none"> <li>• compliance with Applicable Laws</li> <li>• providing a safe and healthful environment for employees, park staff and visitors to the extent possible</li> <li>• assigning responsibilities</li> <li>• providing staff and resources</li> <li>• monitoring performance</li> </ul>	Yes	
<b>2. Responsibility and Accountability</b>	2.1	The concessioner identifies a safety and health official, and documents this assignment in the RMP.	Yes	
	2.2	The concessioner identifies the risk management organizational and staff responsibilities, and documents this structure and assignments in the RMP.	Yes	
	2.3	RMP resources are developed, documented in the RMP, and applied; resources are adequate to execute the program. Resources include: <ul style="list-style-type: none"> <li>• personnel (e.g., number of staff, experience and skills)</li> <li>• facilities and equipment</li> <li>• information, documentation, and data management systems</li> <li>• agreements for support from outside contractors and agencies</li> <li>• training programs for concession personnel</li> </ul>	Yes	
<b>3. Training</b>	3.1	Managers and staff with safety and health responsibilities meet the qualification requirements defined in the contract and RMP. Competency requirements are defined by appropriate education, training, and experience.	Yes	
	3.2	A training plan is developed, documented in the RMP, and executed; and includes: <ul style="list-style-type: none"> <li>• Defined training requirements for the safety officer and other personnel, including requirements to meet Applicable Laws, the contract, and the RMP.</li> <li>• Required training records, such as training materials, schedules, and participant records.</li> </ul>	Yes	RMP Training was provided to all staff as part of the CLH on-boarding process.
	3.3	The concessioner has conducted and documented all training.	Yes	

4. Documentation and Operational Controls	4.1	RMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws, the contract, and the RMP to ensure safe operations. Some plans and procedures may overlap with those in the EMP. Examples of operating procedures include: <ul style="list-style-type: none"> <li>• procedures for the safe storage and handling of chemicals</li> <li>• procedures for embarking and disembarking visitors</li> <li>• procedures for safe equipment use</li> <li>• procedures for managing wildlife interactions</li> <li>• procedures for cancelling operations due to weather</li> </ul>	Yes	
	4.2	RMP emergency plans and procedures are developed, documented (if applicable), implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws, the contract, and the RMP. Some plans and procedures may overlap with those in the EMP. Emergencies to be addressed include: <ul style="list-style-type: none"> <li>• natural disasters (ear hquakes, floods, tornados, hurricanes, etc.)</li> <li>• motor vehicle incidents</li> <li>• medical emergencies (visitors and employees)</li> <li>• fire (structural, motor vehicles, wildfires, etc.)</li> <li>• terrorism and law enforcement activities</li> <li>• accidents and fatalities (visitors and employees wi hin park boundaries)</li> </ul>	Yes	
5. Communications	5.1	The RMP is available to staff and communicated hroughout the concession organization so that personnel understand and can effectively implement the RMP.	Yes	Located behind the desk at Mazama dorm in bright yellow binders.
	5.2	The RMP addresses procedures for communicating hazards to visitors. The hazards may include: <ul style="list-style-type: none"> <li>• Activity-related hazards (e.g., white water rafting)</li> <li>• Natural resource-related hazards (e.g., bears)</li> <li>• Facility-related hazards and procedures (e.g., property evacuation maps)</li> </ul>	Yes	
	5.3	Any visitor acknowledgment of risk is approved by the park. Waivers of liability are not used.	Yes	
	5.4	The concessioner's risk emergency plans are coordinated and agreements in place with other applicable par ies such as the NPS, other federal, state, or local emergency response agencies.	Yes	
6. Reporting	6.1*	All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided to the NPS in accordance with the contract. Additional plans, reports, and o her documentation are submitted to the NPS in accordance with the contract and RMP.	Yes	
	6.2*	Imminent danger and serious incidents are reported to the park in a timely manner in accordance with the contract and RMP.	Yes	There was one instance of a mooring coming loose and a tour boat drifting to the west side of the lake overnight. NPS unable to confirm if his was reported in a timely manner. A reminder that any incident that may result in injury to staff or visitors, or damage to assets or park resources, should be reported promptly.
	6.3	Annual reports include internal, park, and other regulatory agency risk data, and are submitted to the NPS in accordance with the contract and RMP.	Yes	
7. Inspections and Corrective Action	7.1	Safety inspections are conducted as specified in the contract and RMP or as otherwise necessary to effectively manage operations safely. Formal and routine inspections are scheduled, conducted, and documented. The inspections are conducted by qualified personnel as described in the RMP.	Yes	
	7.2*	Imminent danger, serious, and non-serious hazard deficiencies identified by internal or external inspections are analyzed, corrected, or mitigated within the contract or RMP required timeframes. Any deviations from these timeframes are accepted by the park and documented.	No	NPS staff observed or learned of several instances where the CLH roofing contractors at the Crater Lake Lodge created unsafe conditions. Examples include leaving unsecured ladders in place for multiple days while visitors had access, tools, and debris falling from the roof, unsecured work and staging areas, and a lack of directional signage, communication, or staff presence to ensure guests, hikers, and other visitors understood how to navigate around the construction zones, creating confusion and a higher likelihood of visitors wandering into unsafe areas. NPS reports of these hazards were not promptly addressed or addressed for a time, hen repeated. Please see the narrative for additional discussion.

8. Hazard Incident Investigations and Abatement	8.1*	Accidents/incidents are responded to in a timely and effective manner.	Yes	
	8.2	An investigation is conducted for every accident/incident. • The investigation includes an analysis to determine the cause. • Corrective action is taken to mitigate recurrences of the accident/incident.	Yes	
9. Management Review	9.1*	The RMP is reviewed at least annually, and updated as necessary. • The RMP review includes analysis of performance in each RMP element area to determine any systemic program failures (particularly failures that resulted in fatal or serious accidents/incidents or imminent danger hazard deficiencies) and non-compliance with Applicable Laws. • Systemic problems are addressed in RMP updates.	Yes	
	9.2	The initial RMP is submitted to the park within the contract specified timeframe for review, and is accepted by the park. Any subsequent documented RMP updates are submitted to the park for review and acceptance.	Yes	
10. Other Contract Requirements	10.1	Contract-specific safety and health requirements not otherwise addressed in the RMP standards are met.	Yes	

\*Special Attention Item

ADDITIONAL NOTES / COMMENTS
The RMP was accepted by the Service on January 11, 2022. Please refer to the attached narrative for additional comments.

Table 2: Scoring

Scoring			
Program Area	Score (%)	Program Area	Score (%)
1. Risk Management Program (RMP) Scope	100.0%	7. Inspections and Corrective Action	50.0%
2. Responsibility and Accountability	100.0%	8. Hazard Incident Investigations and Abatement	100.0%
3. Training	100.0%	9. Management Review	100.0%
4. Documentation and Operational Controls	100.0%	10. Other Contract Requirements	100.0%
5. Communications	100.0%		
6. Reporting	100.0%		

**Total - All Program Areas**

# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Item)	# N/A	# Applicable Reqs.
23	1	1	0	24

<b>Risk Management Score</b>	<b>95.8</b>	Superior = 90 – 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = ≤49
<b>Adjusted Risk Management Score</b>	<b>69.0</b>	
<b>Rating</b>	<b>Marginal</b>	

Notes:

- If 1-2 Special Attention Items are not in compliance, the Risk Management Score is adjusted to Marginal and capped at 69.
- If 3+ Special Attention Items are not in compliance, the Risk Management Score is adjusted to Unsatisfactory and capped at 49.

**United States Department of the Interior - National Park Service**  
**Form 10-EMP - Environmental Management Program Evaluation Report**

<b>Park</b>	<u>CRLA</u>	<b>Concessioner DBA</b>	<u>Crater Lake Hospitality</u>
<b>Concessioner Name</b>	<u>Aramark</u>	<b>Year of Operation</b>	<u>2022</u>
<b>Contract Number</b>	<u>CC-CRLA004-18</u>		

**Instructions:**  
The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

*Notes:*  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Environmental Management Program (EMP) Scope</b>	1.1	The concessioner's EMP scope (whether documented or undocumented) covers the environmental objectives and environmental management aspects applicable to the operation including: <ul style="list-style-type: none"> <li>• legal requirements (Applicable Laws), contract requirements (including requirements contained in Exhibits), and environmental best management practices</li> <li>• facilities and operations</li> <li>• natural and cultural resources</li> </ul>	Yes	
	1.2**	The EMP is documented.	Yes	
	1.3**	The EMP establishes the concessioner's environmental policy. The policy indicates commitment to: <ul style="list-style-type: none"> <li>• compliance with Applicable Laws</li> <li>• protecting and conserving park resources and human health</li> <li>• assigning responsibilities</li> <li>• providing staff and resources</li> <li>• monitoring performance</li> </ul>	Yes	
<b>2. Responsibility and Accountability</b>	2.1**	The concessioner must identify an environmental officer and/or program manager and document this assignment in the EMP. The environmental officer must meet the contract specified qualifications and requirements defined in the documented EMP.	Yes	
	2.2	The concessioner determines management and staff responsibilities as necessary to effectively manage environmental activities, and describes this structure and these assignments in the documented EMP (if applicable).	Yes	
	2.3	EMP resources are developed, documented in the EMP (if applicable), and applied; resources are adequate to execute the program. Resources include: <ul style="list-style-type: none"> <li>• personnel (e.g., number of staff, experience and skills)</li> <li>• facilities and equipment</li> <li>• information, documentation, and data management systems</li> <li>• agreements for support from outside contractors and agencies</li> <li>• training programs for concession personnel</li> </ul>	Yes	
<b>3. Training</b>	3.1	Managers and staff with environmental management responsibilities meet qualification requirements defined in the contract and documented EMP (if applicable). Competency requirements are defined by appropriate education, training, and experience.	Yes	
	3.2	A training plan is developed, documented in the EMP (if applicable), and executed; and includes: <ul style="list-style-type: none"> <li>• Defined training requirements for the environmental officer and other personnel, including requirements to meet Applicable Laws, the contract, and the EMP.</li> <li>• Required training records, such as training materials, schedules, and participant records.</li> </ul>	Yes	
	3.3	The concessioner has conducted and documented all training.	Yes	EMP Training was provided to all staff as part of the CLH on-boarding process.

4. Documentation and Operational Controls	4.1	<p>EMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the documented EMP (if applicable). These procedures address requirements in Applicable Laws, the contract, and the EMP to ensure protection of human health and the environment. Some plans and procedures may overlap with those in the RMP. Examples of operating procedures include:</p> <ul style="list-style-type: none"> <li>• procedures for the storage and handling of chemicals</li> <li>• procedures for the management and maintenance of fuel</li> <li>• procedures for pesticide use</li> <li>• procedures for hazardous and solid waste disposal</li> <li>• procedures for weed and pest management</li> <li>• procedures for the protection of cultural and archeological resources</li> </ul>	No	<p>CLH continued to struggle with the appropriate documentation and storage of chemicals. On several occasions, including periodic evaluations for the boat tours, it was found that fuel was being stored in containers not designed for storage in enclosed areas (outside of the flammable storage cabinet). At the Cleetwood fuel building and the Lodge, items were being stored in the flammable cabinet sump area, which should be kept clear for spill containment and is a repeat finding from previous inspections at other CLH locations in the park. At the Lodge, incompatible materials were found stored in the flammable cabinet (MAPP gas product was stored with other combustible chemicals). This was a previous finding from the 2021 environmental audit. GHS for hazard communication has not been fully implemented. Common cleaning chemicals from CLH's contracted chemical provider are well documented. However, SDS's are not present for most limited-use chemicals found in facility maintenance.</p> <p>Cleetwood fuel documentation was incomplete. The fuel logs for the Cleetwood Cove tank meant to monitor tank levels and detect potential leaks in the tank or fuel line were not consistently or accurately maintained. Manual fuel level monitoring is required under the state operating permit due to the lack of an ATG (Automatic Tank Gauge). Tank levels were not manually recorded for most of the season until requested by NPS, despite NPS training at the beginning of the season.</p>
	4.2	<p>EMP emergency plans and procedures for environmental management are developed, documented (if applicable), implemented, maintained, and included or referenced in the documented EMP (if applicable). These plans and procedures address requirements in Applicable Laws, the contract, and the EMP. Some plans and procedures may overlap with those in the RMP. Emergencies to be addressed include:</p> <ul style="list-style-type: none"> <li>• hazardous substance spill response</li> <li>• leaks from fuel storage tanks or other chemical storage areas</li> <li>• storm water contamination</li> </ul>	Yes	
5. Communications	5.1	The EMP is available to staff (if applicable), and communicated throughout the concession organization so that personnel understand and can effectively implement the EMP.	Yes	
	5.2	<p>The EMP addresses procedures for communicating environmental controls and initiatives to visitors. These may include:</p> <ul style="list-style-type: none"> <li>• Handling hazardous materials (e.g., fuel)</li> <li>• Handling waste (e.g., trash)</li> <li>• Natural resource or cultural resource impacts</li> <li>• Pest management (e.g., notification of pests if observed)</li> </ul>	Yes	
	5.3	The concessioner's environmental emergency plans are coordinated and agreements in place with other applicable parties such as the NPS, other federal, state, or local environmental agencies.	Yes	
6. Reporting	6.1*	All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided to the NPS in accordance with the contract. Additional plans, reports, and other documentation are submitted to the NPS in accordance with the contract and documented EMP (if applicable). These may include inventories of hazardous substance and waste streams.	Yes	
	6.2*	Notices of any discharges, release or threatened release of hazardous or toxic substance, material or waste are reported in a timely manner to the NPS in accordance with the contract.	Yes	
	6.3*	Any written, threatened or actual notices of violation of Applicable Law from any environmental regulatory agency are reported in a timely manner to the NPS in accordance with the contract.	Yes	
	6.4	The NPS is provided timely written advance notice of, and the opportunity to participate in, communications with regulatory agencies regarding the concessioner's environmental activities in accordance with the concession contract.	Yes	
	7.1	Environmental inspections are completed as required by Applicable Law, the contract, the documented EMP (if applicable), or as otherwise necessary to effectively manage environmental activities.	Yes	
	7.2*	Environmental deficiencies identified by internal or external inspections (e.g., NPS concession environmental audits, etc.) are analyzed, corrected, or mitigated within the timeframes designated by Applicable Law, the contract, documented EMP (if applicable), or inspection report. Any deviations from these timeframes are accepted by the park and documented.	Yes	One item outstanding from the 2021 Environmental Audit, but this is a long term project that will be completed in conjunction with multiple CFIP projects.



7. Monitoring, Measurement and Corrective Action	7.3	Environmental incidents are responded to in a timely and effective manner to stop, contain, and remediate the incident. Investigations are conducted, and corrective actions are taken to prevent recurrences to the satisfaction of the NPS in accordance with the contract, EMP, and relevant regulations and NPS policies.	No	Hydraulic fluid leaks from a CLH-owned Bobcat at Annie Creek and a rented articulated boom lift operated by CLH's roofing contractors were not properly contained or cleaned up until discovered by NPS staff. These spills are not believed to have exceeded reporting thresholds or would have been documented as hazardous chemical discharges, a special attention item. In June, a significant amount of grease-containing liquid overflowed from the Rim Cafe Trash compactor. In cleaning up this spill, which stained the asphalt, an employee flushed it with water for about an hour with a hose rather than using a cleaning agent and brush. This wasted water during a time when drought-related water-use restrictions were in place in the park.
	7.4***	The EMP is reviewed at least annually, and updated as necessary. • The EMP review includes analysis of performance in each EMP element area to determine any systemic program failures (particularly failures that resulted in serious incidents of inspection deficiencies), and non-compliance with Applicable Laws. • Systemic problems are addressed in EMP updates.	Yes	
	7.5**	The initial EMP is submitted to the park within the contract specified timeframe for review, and is accepted by the park. Any subsequent documented EMP updates are submitted to the park for review and acceptance.	Yes	Initial EMP was not submitted on time. However, it was accepted as of January 11, 2022 and thus met contract requirements for this rating period.
8. Other Contract Requirements	8.1	Contract-specific environmental requirements not otherwise addressed in the EMP standards are met.	No	Of the 26 environmental management actions listed in the contract (exhibit H) and noted in the letter to Aramark in November 2021, 16 have been completed. 6 of the remaining are overdue.

\* indicates a Special Attention Item

\*\* indicates item is not applicable to Cat III contracts

**ADDITIONAL NOTES / COMMENTS**

Please refer to the attached narrative for additional comments.

**Table 2: Scoring**

Scoring				
Program Area	Score (%)	Program Area	Score (%)	
1. Environmental Management Program (EMP) Scope	100.0%	6. Reporting	100.0%	
2. Responsibility and Accountability	100.0%	7. Monitoring, Measurement and Corrective Action	80.0%	
3. Training	100.0%	8. Other Contract Requirements	0.0%	
4. Documentation and Operational Controls	50.0%			
5. Communications	100.0%			
<b>Total - All Program Areas</b>				
# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Item)	# N/A	# Applicable Reqs.
21	3	0	0	24
<b>Environmental Management Score</b>	87.5		Superior - 90 - 100 Satisfactory = 70 - 89 Marginal = 50 - 69 Unsatisfactory = <49	
<b>Adjusted Environmental Management Score</b>	87.5			
<b>Rating</b>	Satisfactory			

Notes:  
- If 1-2 Special Attention Items are not in compliance, the Environmental Management Score is adjusted to Marginal and capped at 69.  
- If 3+ Special Attention Items are not in compliance, the Environmental Management Score is adjusted to Unsatisfactory and capped at 49.

**United States Department of the Interior - National Park Service**  
**Form 10-AMP - Asset Management Program Evaluation Report**

<b>Park:</b> CRLA	<b>Concessioner DBA:</b> Crater Lake Hospitality
<b>Concessioner Name:</b> Aramark	<b>Year of Operation:</b> 2022
<b>Contract Number:</b> CC-CRLA004-18	

**Instructions**  
The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

*Notes:*  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the Instructions and TOC tab.  
- To use Spell Check, hold **Ctrl + Shift + S** on your keyboard.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Annual Concessioner Maintenance Plan (ACMP)</b>	1.1	The ACMP is updated annually and submitted on time.	Yes	The concessioner submitted their Concessioner Maintenance Plan and Report (CMPR) on January 5, 2022.
	1.2	The ACMP is accurate and complete	Yes	
	1.3	Projected maintenance expenditures are provided.	Yes	However, projections have been inaccurate as maintenance planning is minimal and projects are poorly developed.
<b>2. Inspections</b>	2.1	Inspections were performed on schedule.	Yes	CLH now has a pre-season and routine inspection schedule.
	2.2	Inspection findings were addressed in a timely manner.	No	It is difficult to ascertain if inspection findings are addressed since they are not being well documented in CLH's maintenance tracking system. During 2022, only 270 total work orders were entered into the Facility Fit system, and 115 (43%) remain Open or In-Progress. Additionally, NPS staff continued to find that routine inspections of basic items such as air filters have not occurred for months.
	2.3	Periodic evaluation facility findings were addressed in a timely manner.	No	There were several incidences of repeat deficiencies during periodic evaluations throughout CLH-managed facilities. And in some instances, findings addressed during PE's were addressed, but poorly.
<b>3. Maintenance</b>		Facility maintenance was performed as scheduled in a timely manner:		
	3.1*	Preventative Maintenance	Yes	Preventative Maintenance (inspections or adjustments made on an annual or greater basis) performed by outside contractors was completed and documented. Inspection results were provided to the NPS as documentation. In-house PM documentation continues to need improvement. Only one preventative maintenance project was documented in FacilityFit during 2022.
	3.2*	Recurring Maintenance	No	Recurring Maintenance performed by outside contractors was completed and documented. Only limited recurring maintenance was performed (Lodge floor refinishing). In-house RM documentation continues to need improvement. No Facility Fit work orders were categorized as recurring. There does not appear to be a schedule for completing recurring maintenance. The NPS has identified a number of projects that should be recurring (painting, campground picnic table repairs, removing debris from roofs, roof repairs, etc.) where recurring maintenance has been deferred to the point it has resulted in the need for more extensive and costly repairs.
	3.3	Scheduled Repairs	Yes	Limited documentation was provided from CLH other than a few Facility Fit work orders.
	3.4	Unscheduled Repairs	Yes	A maintenance log was kept for the Crater Lake Lodge and showed the reporting of mostly unscheduled repairs and other miscellaneous facility maintenance requests and noted when a repair was made and by whom. Documentation is limited for other locations, though some work orders can be found in Facility Fit. The majority of Facility Fit workorders are for unscheduled repairs. There are large gaps in this data, however.
	3.5*	Component Renewal/Replacement	No	The Lodge Roof Component Renewal project was completed during this rating period. However, other component renewal projects have languished. Several of the Mazama Cabin roofs are in a severely degraded condition, to the point where the building integrity is threatened.
	3.6*	Deferred Maintenance	No	There are several deferred maintenance projects (Mazama Cabin roofs, Mazama Dorm roof, Rim Dorm) where work has not been initiated and conditions continue to decline.
<b>4. Reporting</b>		Accurate and complete reports were submitted on time, in the correct format:		
	4.1	Annual Concessioner Maintenance Report	Yes	
	4.2	Concessioner Project Plan and Report	Yes	Submitted on January 5, 2022
	4.3	Fixture Replacement Report	N/A	Concessioner waved LSI for Fixtures (Exhibit A, Sec. 15 and 16)
	4.4	Component Renewal Report	Yes	Financial tracking of the RMR budget is being completed. However, a final completion report for the Lodge roof has yet to be received. The Service is not aware of any other Component Renewal projects attempted during the rating period.
	4.5	Personal Property Report	Yes	Submitted Feb. 2022
<b>5. Computerized Maintenance Systems (CMMS)</b>	5.1	CMMS is maintained and current.	No	Facility Fit was implemented in November 2021. The use of the system needs to be expanded, however. Not all maintenance activities are documented. No work orders were entered into the CMMS between May 27 2022 and October 16, 2022.
	5.2	All maintenance actions and associated expenditures requested by the Service were provided in the correct electronic format.	Yes	They are provided in the correct format. However, they typically lack sufficient detail.
<b>6. Other Contract Requirements</b>	6.1	Contract-specific facility maintenance requirements, not otherwise addressed in the AMP standards, are met.	No	Projects were completed without approval from the National Park Service and no project statements were submitted or were submitted late: A project was undertaken in Rim Café that altered NPS-owned fixtures and capped utilities without NPS or USPHS knowledge. A project that required the removal of wall finishes for an exhaust fan repair in the historic Crater Lake Lodge was initiated without NPS knowledge.

\* indicates a Special Attention Item

**ADDITIONAL NOTES / COMMENTS**

See attached narrative document.

**Table 4: Scoring**

**Scoring**

Program Area	Score (%)	Program Area	Score (%)	
1. Annual Concessioner Maintenance Plan (ACMP)	100.0%	5. Computerized Maintenance Systems (CMMS)	50.0%	
2. Inspections	33.3%	6. Other Contract Requirements	0.0%	
3. Maintenance	50.0%			
4. Reporting	100.0%			
<b>Total - All Program Areas</b>				
# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Items)	# N/A	# Applicable Reqs.
12	7	3	1	19
<b>Asset Management Score</b>	<b>63.2</b>	Superior 90 – 100 Satisfactory 70 – 89 Marginal 50 – 69 Unsatisfactory ≤49		
<b>Adjusted Asset Management Score</b>	<b>49.0</b>			
<b>Rating</b>	<b>Unsatisfactory</b>			
<i>Notes:</i> - If 1-2 Special Attention Items are not in compliance, the Asset Management Score is adjusted to Marginal and capped at 69. - If 3+ Special Attention Items are not in compliance, the Asset Management Score is adjusted to Unsatisfactory and capped at 49.				

**UNITED STATES DEPARTMENT OF THE INTERIOR – NATIONAL PARK SERVICE  
Crater Lake National Park  
Aramark d/b/a Crater Lake Hospitality (CLH)**

**CC-CRLA004-18  
2022 Annual Overall Rating Narratives**

**CFIP/Construction/Repair and Maintenance Reserve or Rehab Projects**

**Repair and Maintenance Reserve – Lodge Roof**

The Crater Lake Lodge Roof was identified in Exhibit H of the concessions contract as a Component Renewal Deferred Maintenance project to be addressed by CLH as an RMR-eligible project. CLH completed the project in 2022, which represents the largest facility maintenance project undertaken to date. The National Park Service had concerns about the ability of CLH to successfully implement the project as early as the project proposal stage due to the submittal of a poorly developed scope of work. The NPS worked with the concessioner to improve the scope and ensure that items like safety plans and realistic schedules were submitted by their roofing contract.

CLH chose not to heed some NPS recommendations and issues began immediately when the roofing company was forced to demobilize their crew as spring snowstorms, typical for this area, stopped work for 20 days. When the project did begin in earnest, CLH did not have a project manager on-site to monitor the work. This lack of oversight resulted in the NPS uncovering frequent and sometimes serious issues when conducting inspections of the project, which were exacerbated by the roofing contractor's foreman who exhibited poor professional conduct and was eventually removed from the project.

The issues witnessed during construction were wide-ranging and included: failure to delineate work zones, failure to contain project debris – project waste was not policed daily and was found hundreds of meters away from the project site including in the caldera, not securing trash loads in vehicles during transport, alleged theft of supplies (specifically copper) due to unsecured staging areas, damage to the cultural landscape from driving equipment off paved surfaces, damage to paved surfaces, hazardous chemical spills, disregard of lawful orders, potential OSHA violations, and; significant visitor dissatisfaction about the lack of communication about working hours, noise and extended length of the project through the summer.

There are also lingering concerns about the quality of work. While NPS inspectors did find the general quality of work minimally acceptable, inspections were limited in frequency and scope, and quality issues were observed or suspected. Examples include over-driven nails through the tongue and groove soffit under the eaves, not mixing shingle batches, and inconsistent and haphazard application of roofing products. Time will tell how the new roof performs, however,

water infiltration issues in the Lodge from winter ice damming persist. While winter water damage can not necessarily be attributed to the roofing project, the new roof does not appear to have corrected these issues.

The biggest concern to the NPS now is how CLH's management of this project will inform how they manage several major facilities projects they have proposed in the near future. The Service hopes the significant failures experienced in scoping and managing this project will ensure that future projects will have qualified concession staff engaged in project planning and full-time, on-site construction management.

### **CFIP/PPIP**

We have now completed the fourth full year of operations under this contract and none of the Personal Property Improvement Program (PPIP) or Concession Facility Improvement Program (CFIP) projects have been fully executed. Only one of these projects, the Rim Village Café Building Improvements, has had an initial phase of work completed. There were no final plans approved for any of the other eight projects by the end of the rating period. The original contract deadlines for all of these projects and actions have passed. In recognition of the difficulties posed by COVID-19 pandemic, the Service extended many project deadlines by over a year. All of the extended deadlines have passed and none were met.

In March 2022, the Service sent a letter to Bruce Fears, President at Aramark Parks and Destinations, detailing these deficiencies, in addition to twenty incomplete environmental management actions that would improve water and energy conservation or reduce solid waste within the concession's operation, which are required in the contract. The delay in implementing these projects has now led to increased costs for completion, concern that projects will not be completed during the life of the contract, and deterioration of facilities and visitor experience. Several of the projects and actions, and any accelerated deadlines for completion (over those required in the prospectus), were proposed by CLH as Elements of a Better Offer when competing for this contract.

Within this letter, the Service requested a detailed timeline for completing all PPIP and CFIP projects. Although this request was repeated several times throughout the year, an acceptable list was never provided to the service in 2022. CLH did, however, begin to accelerate its efforts in planning for the Rim Dormitory Rehabilitation and designing and acquiring new Tour Boats targeted for delivery during 2023. In the case of Rim Dorm, CLH did submit a project proposal package for approval in November 2022. Approval has not yet been received as the proposal was incomplete, but the project design is in its final stages and nearing approval.

### **Risk Management**

While CLH has made efforts to implement its risk management program, there were instances this season where hazards were observed during inspections and not properly mitigated. Of note, were the safety concerns with the work on the lodge roof throughout the summer. As noted elsewhere in this rating, CLH's contractor was not properly monitored by CLH staff. The

roofing contractor regularly failed to follow their own safety plan and did not practice good job site safety practices. The NPS informed CLH on May 26 that the roofing contractor had left ladders in place on the Crater Lake Lodge that were not secured to the building and were accessible to the public. The NPS informed CLH that these ladders were to be secured or removed. No action was taken by CLH or their contractor and these ladders remained in-place during the busy Memorial Day Holiday weekend while no contract workers were onsite. NPS inspectors continued to observe issues throughout the summer, including but not limited to: lack of use of hard hats, not securing tools and supplies while on the roof, not sufficiently delineating work zones, not controlling access to work zones, intermixing staging areas with public use and traffic violations while driving to and from the jobs site. When safety concerns were identified during an inspection and were corrected, the NPS would find that the same issue would reoccur because CLH staff were not monitoring the project.

There were several instances this summer of security issues at the employee dormitory buildings. One incident of note involved an employee who was terminated from CLH employment and allegedly threatened harm to the building and its occupants. Due to the lack of a controlled entry system at the entrances to the dorm buildings, it was a major concern that the individual would be able to access the building again later. This highlights the need for security doors and locks on all dorm buildings so only residents and staff have access.

### Environmental Management

Significant progress was made in Aramark’s Environmental Management program in 2022, including the hiring of a sustainability manager, (b) (6). Aramark submitted their Greenhouse Gas Annual Report late due to a contractor delay, but it was complete, and the template was established for future reports. Significant progress was made in installing environmentally preferred fixtures, including lighting, water fixtures, appliances, and toilets. Aramark is also working on documenting its waste streams and securing new recycling vendors, to increase its diversion rate.

A solid waste audit, originally due to be completed in 2019, was conducted this year. This assisted CLH in understanding its waste streams and will allow them to develop processes to divert waste from landfills. This is an initial step in the process to implement a zero-landfill program, which it is pursuing, but has not yet established. Landfill diversion rates are still lagging. A 75% reduction was required in the first year of the contract. This objective was revised by the NPS to provide additional time to increase recycling to 20% by September 30, 2022, and then 75% by October 31, 2023. The concessioner is not on-track to meet this target based on their recent diversion rate trends.

Table 1. Diversion Rate (Percent of total waste stream recycled as reported by CLH).

2020	2021	2022
12%	24%	13%

The concessioner's trash hauler discontinued comingled recycling services in 2022, due to an unacceptably high contamination rate. However, the NPS does recognize that significant efforts were finally placed into contract requirements related to waste management that have remained unmet in previous years. These include improving employee recycling, seeking new and unique recycling opportunities, and laying out a roadmap to achieve contract-required waste management goals. The Service hopes these efforts continue.

The NPS remains concerned that while CLH has implemented an Environmental Management Program, it is not being effectively implemented across all its functional areas. There continue to be repeat findings related to facility management operations. As noted in the AOR rating, chemical documentation and storage continues to be an issue. These concerns extend to the monitoring of fuel storage and delivery systems, particularly at the extremely sensitive Cleetwood Cove site. Equipment maintenance may also be lacking, as hydraulic leaks in equipment do not appear to be addressed before they become severe. The Service hopes these items will be addressed by CLH's new maintenance manager.

### **Public Health**

The Crater Lake Lodge Restaurant once again received an Unsatisfactory Public Health Food Safety Inspection Report in 2022, for the 3<sup>rd</sup> time in the last 4 years. A marginal rating was issued during the final USPHS inspection in September. Issues noted included hot and cold holding, general cleaning, and the labeling of food items. While CLH did develop a corrective action plan to address the violations, NPS inspectors continued to find code violations during formal and informal inspections throughout the season. The food service operations were less complex at the Lodge this year due to the buffet-only service. The Service hopes that additional training and attention are provided to Lodge food service staff as they make a transition back to menu service in 2023.

While the Annie Creek Restaurant received satisfactory ratings in their USPHS inspections, NPS evaluators were surprised to find numerous food code violations during a periodic evaluation on July 20. NPS evaluators began to have concerns about the restaurant when staff heard the boilers were having issues and the building had not had any hot water for multiple days. Upon learning this, NPS staff visited the restaurant on the evening of July 1 and found the water temperature in the kitchen to be 75 degrees. Kitchen items were being washed in the automatic washer with the water not meeting the minimum temperatures listed on the machine placard. The lack of hot water for cleaning and handwashing was a food code violation. The restaurant was then closed by CLH until alternate systems could be put in place to ensure food safety. It is unclear why CLH management did not take immediate action to address the boiler failure and allowed the restaurant to operate without hot water.

## Asset Management

Asset management continued to be an area of concern for NPS staff. In addition to the issues noted elsewhere in this rating related to advancing required CFIP and PPIP projects, and oversight of CLH contractors, maintenance activities continued to have a strong focus on unscheduled repairs, rather than a proactive program of scheduled and routine maintenance. This was the first year a CMPR and CPPR was submitted as required in the contract. These plans were rudimentary but were accepted by the service as a good first step in establishing a program of work for the asset management program. Outside of contracted preventative maintenance projects and NPS-identified unscheduled repair needs found during inspections and evaluations, little progress was made in completing the objectives outlined in these plans.

One persistent issue with accomplishing work, as was noted in the previous year's AOR, is CLH project proposals continue to be submitted late and without the level of detail needed to ensure code compliance and evaluate project impacts. This is particularly a concern for the CFIP projects that require elevated levels of review and approval. Other projects have had repeated change requests after approval for items that should have been identified during project development, indicating a lack of initial planning. And in more than one case this year, projects were undertaken without NPS knowledge or approval (Rim Café kitchen redesign and Lodge exhaust fan repairs). Project proposals should be thought out well in advance and provide a higher level of detail to allow the NPS to conduct complete and efficient compliance reviews. The concessioner must also improve their Scope of Work documents for their contractors to ensure they are clearly defining the work to be completed.

A contributing factor in the poor performance within the asset management program is likely the lack of on-site program management. In June 2022, the Maintenance/Engineering Manager position was vacated, and the position remained unfilled until March 2, 2023. This position is contractually obligated in Exhibit B, Page B-3: "Fill and replace any vacant or open key positions in a timely manner, **but no later than 60 days** after the key position becomes vacant or open, to ensure efficient operations. Key positions include the General Manager, Maintenance / Engineering Manager, and other departmental managers." Although the Service realizes that hiring professional positions can take time, this is a critical position and no CLH staff member of sufficient qualifications was temporarily placed into this role to handle the workload in the interim. Another potential consequence was a lack of guidance and oversight in the winterization of CLH buildings, which was likely a contributing factor to several issues with climate control, water, and fire systems throughout the 2022/2023 winter.

Documentation of maintenance work orders has improved over the last year with the introduction of Facility Fit. However, there was an approximately five-month gap (May – October 2022) where no work orders were entered. While a number of small repair items were addressed, many incomplete maintenance needs were noted as repeat deficiencies during periodic evaluations throughout the season. The Service is hopeful that Facility Fit reporting will continue to improve and become a useful tool to ensure all maintenance items that need attention are being addressed in a timely and effective manner.



## Administrative Compliance Reporting

Most administrative reports were submitted and received on time for the 2022 year, including Franchise Fee Reports, CPPR, CMPR, Greenhouse gas report (the Service extended the due date to allow a contractor to complete the report), other environmental reports, and updates on the RMP and EMP. A few report emails were received late, including a few guest comment emails and employee contact information lists. However, all reports were received within a few days of either the due date or upon request by the NPS. Occupancy Statistics were received on time but found to be inaccurate due to a spreadsheet error after a few months and required correction in October 2022.

## Annual Visitor Use Statistics/Utilization Data

Service/Facility	2020 Customers	2021 Customers	2022 Customers	Percent change over ...	
				2020	2021
Concessioner Lodging	(b) (4)	(4)			
Mazama Campground					
Boat Tours					
Overall Park Visitation	670,500	647,751	527,259	(21%)	(18%)

## Problems/Issues and Resolution

- The NPS is concerned that several facilities did not open on-time this season including the campground, service station, boat tours, and Cleetwood Cove restrooms. There were a number of reasons cited, however, sufficient efforts were not made to ensure these critical services were provided. In the case of boat tours and the Cleetwood Cove restrooms, these concerns had to be escalated to higher levels of Aramark management for progress to be seen. The Cleetwood Cove restroom facilities not being open to the public was a significant concern as it presented a public health concern and threat to the park's primary resource. Once pressed, facilities were opened hastily, and significant NPS oversight was needed to prevent issues. For example, the Cleetwood Cove composting toilets were opened to the public without the composter system being operational on July 20th. During an NPS periodic evaluation on September 8<sup>th</sup>, the composting toilets evaporator units were still not working, and a liquid tank was found to be filled to capacity. The NPS feared that if this condition had not have been pointed out that the unit may have overflowed. When the evaporating isn't working, the liquid waste needs to be frequently pumped out of the tanks and disposed of in the park's wastewater system. For the boat operations, NPS staff led the entire boat tour operations training for CLH. The Service expects CLH to be much more involved in training development and delivery next season. There was also a clear lack of

preparation of front desk staff in assisting visitors with boat tour reservations once tours opened. Staff at Mazama were not aware that they were one of the ticket sales locations and the reservation process itself was confusing for guests and staff alike. Several guest comments noted that communication between the staff at Cleetwood Cove and the Lodge/Mazama Village was not reliable, resulting in guests missing out on tours altogether.

- The NPS boat crew observed an overuse of the tractor on the Cleetwood Cove Trail, a practice that leads to higher levels of trail degradation and erosion. CLH has been advised that the tractor should only be used to transport full loads of equipment and supplies to and from Cleetwood Cove area, not for regular transport of employees.
- As noted above, the campground opened late. One concern cited at the time was the presence of snow. Please note the NPS expectation is that snow removal is conducted so the campground can open for the contract-specified summer season or earlier. Snow removal can be limited to the parking areas of the campground, entire sites are not required to be free of snow to be available to campers (however, CLH staff should inform campers of site conditions so they can make educated decisions before choosing to stay). Park staff have relayed that CLH has held the contract during a period of relatively mild winters, and CLH staff must be better prepared to open in spring when more significant snowpacks persist. This includes ensuring that snow poles are set sufficiently to guide snow removal and protect infrastructure.
- This season CLH ran out of automotive fuel at the service station and propane at the Crater Lake Lodge. In addition to causing disruptions to concession operations, it also raised concerns that CLH staff were not closely monitoring fuel systems, and therefore would have been unlikely to detect a fuel leak or other issue. These oversights are another example of issues that may have been related to the Maintenance Manager vacancy.
- The concessioner-operated Electric Vehicle chargers outside of the Annie Creek Restaurant had unaddressed damage for several months this summer and the condition of the Tesla charger was such that it could have resulted in property damage or injury. As the only in-park charging option, EV owners were very vocal in their frustration with the fact CLH had not made any effort to repair them after reporting the issues to CLH staff. The NPS was forced to intervene and requested CLH replace the chargers with new equipment. CLH managers in the Mazama Village area directed visitors to the NPS citing the charging equipment was not under CLH management. Eventually, (b) (6) was assigned the task and successfully replaced the chargers within a few weeks at a nominal cost. It continues to be an issue that CLH management and employees do not fully understand the company's land assignments or operational requirements under the concessions contract, and that lack of shared information has repeatedly caused issues to persist for excessive amounts of time. This issue also continues to contribute to the confusion with the public and CLH staff about the delineation between the

Concessioner and the National Park Service. With California's 2035 EV mandate and acceleration of the federal support of EV charging build-out, the NPS hopes to work with CLH in 2023 to expand EV charging opportunities within the park. The current demand is not being met with existing infrastructure.

- The season began with reported staffing shortages, which were exacerbated when several employees resigned in mid-June from the Crater Lake Lodge. The departing employees provided anonymous feedback to NPS staff citing several concerns including working excessive hours with no days off, poor living conditions, not having the support of management or receiving the resources to do their jobs, being asked to work extra hours at the last minute (and late into the night) to prepare for Periodic Evaluations, and the strain of dealing with frustrated guests. While the NPS recognizes that there are multiple perspectives to consider when receiving feedback such as this, the employee departures were concerning due to the variety of job functions and seniority levels among the departing employees, and witnessing the preventable frustration of guests that were, for example, impacted by the poorly managed Lodge roof replacement project. One instance that illustrates this is when NPS staff that happened to be on-site had to intervene when they discovered the contractor was blocking off ADA building access for their convenience and not providing instructions about how to get into the building to guests who were unable to navigate the stairs.
- A lack of preparation and training on expectations of staff members working and living in a national park at the beginning of the season led to several instances of resource damage and friction with NPS staff. Training in the use of CLH radios was limited. CLH staff frequently tried to communicate on NPS radio channels, even though NPS staff have repeatedly instructed CLH staff and managers that this should only occur in limited circumstances (emergencies when there is no telephone available and to request access through administrative closures in winter). There was one report of employees on a night excursion to the rim tearing limbs off a whitebark pine, a tree that is listed on the endangered species list. At the beginning of the season, there were several instances of employees driving off the pavement and even parking next to the Annie Creek Restaurant building, even after the NPS directed this behavior to stop. Several visitors also reported to NPS staff that CLH employees told them the NPS was responsible for CLH operational issues, including the delay of boat tours, issues with the electric vehicle chargers that were damaged or offline for a significant time over the summer, and for the limited services offered in the Lodge dining room and Annie Creek Restaurant.
- There were several serious issues with CLH staff in 2022 that required varying levels of law enforcement involvement and investigation. There were multiple situations where alcohol was found in common areas, and documented cases of underage drinking or drug use by staff at the Rim Dormitory. The presence of drugs and alcohol was involved in at least one sexual assault allegation that was initially investigated by law enforcement rangers. Special agents of the National Park Service Investigative Services

Branch (ISB) took over the investigation from NPS rangers. ISB agents expressed concerns about how CLH management handled the case. The NPS law enforcement was also contacted concerning a separate sexual harassment allegation later in the year. Lack of oversight of the CLH dormitories, specifically not having Residential Advisors (RA's) or similar staff assignments who are responsible for enforcing rules and policy for all residents and monitoring for inappropriate behavior, and the expectation that managers living in dorms would act in those capacities, have contributed to these persistent employee conduct issues in CLH-managed housing.

## **Visitor Satisfaction**

Crater Lake Hospitality had varying degrees of visitor satisfaction throughout the 2022 season which seemed very dependent on the location of service. While the Mazama Village services received praise for cleanliness and good customer service, the Lodge saw visitor concerns reported about facility maintenance, food quality and price, and other issues.

### **Crater Lake Lodge Visitor Comment Summary:**

There were several factors throughout the season that caused visitor dissatisfaction with the amenities provided by Crater Lake Hospitality, most notably at the Crater Lake Lodge. When the lodge was opened in May, guests encountered rooms with toilets that had not been turned on, no heat or fans, and ongoing parking issues. Guests were also frustrated by the noise caused by the roof work, which was noted to go on beyond the agreed-upon hours of 8am and 5pm (many guests noted that noise started as early as 7am and did not conclude until after 7pm). The delay in the roof project also required the back patio to be closed for most of the summer, which was a disappointment to many guests. Check-in at the lodge was an issue for the first half of the season, as guests were not permitted to check in before 4pm, causing guests to become frustrated and creating a major bottleneck when check-in was available.

Many complaints were also received about the buffet service style in the Crater Lake Lodge Dining Room. Guests complained that prices were too high for the quality of the food, availability of reservations was low, food often ran out before the end of service, and temperatures were not kept high enough for guest satisfaction or health and safety standards. There were several reports that the main course of prime rib or other meats would run out early, leaving later reservations with no alternative meal.

### **Rim Café Visitor Comment Summary:**

Rim Café received very few reviews overall, with some guests stating that the restrooms needed more regular attention.

### **Mazama Village Visitor Comment Summary:**

There was much praise from visitors about the quality of amenities and service offered at the Camper Store and Mazama Cabins. Most guests reported that rooms were clean upon arrival and the customer service during check-in was excellent. Those who wanted to stay at the Mazama Campground early season were disappointed by the late opening, but there were very

few comments in general after opening day. Annie Creek Restaurant had overall positive reviews, from food quality to customer service.

#### **Boat Tours Visitor Comment Summary:**

Although overall satisfaction with the boat tours themselves was high, the feedback from visitors about the booking process and the delayed start for boats was very negative. Visitors were confused and disappointed and frustrated by the lack of clear communication about when boat tours would start. Which included incorrect dates on the CLH website as well as delayed updated information when boat tours were eventually opened. Guests were also frustrated about the process of booking tours once they were available, stating the reservation system was confusing, information was inconsistent from one employee to another and from one location to another. There was constant miscommunication about ticket availability.

#### **Website Visitor Comment Summary:**

There were several instances during the opening season that the website was not keeping up with the date changes and openings as operations ramped up. There were several times where NPS interpretive ranger reported visitors finding contradictory information on the Crater Lake Hospitality website or opening dates that had passed and the facilities remained closed. The most notable instance was when boat tours started operation, and although reservations could be booked on the website, the alerts on the site still showed the boats as being closed. A focus for 2023 should be making sure the website is accurate and keeping up with changes in operations.

#### **Phones Visitor Comment Summary:**

There were several reported problems with the CLH phone system in 2022. The NPS had to request the removal of the park's direct line from the CLH phone tree in the Spring due to excessive calls to the park about reservations, boat tours, etc. There were also several reports of inactive lines, phones not being answered on a regular basis, voicemails not being returned and, eventually, voicemail boxes being full. In 2023, it should be a priority to have phones answered and voicemails responded to.

#### **Future Plans for Concession Operations**

As part of the 2021 Annual Overall Rating, the Service requested that progress be made on several contract requirements. The requested items, along with the status of each, are as follows:

- New due dates for Energy and Water Conservation and Solid Waste Reduction Measures
  - o The NPS is excited to see CLH begin closing out the sizable list of environmental contract compliance issues. Crater Lake Hospitality is asked to keep the NPS apprised of their progress so items can be removed as they are completed.

**Of the 26 environmental management actions listed in the contract (exhibit H) and noted in the letter to Aramark in November 2021, 16 have been completed. 6 of the remaining are overdue.**

- COVID plan for 2022 and beyond
  - o With COVID-19 seemingly on a downswing and with more understanding about how the disease spreads and affects operations at Crater Lake, Crater Lake Hospitality and the NPS are hopeful that 2022 will bring the operation closer to “the new normal”. Housing policies have been released by the NPS allowing for full occupancy housing (with vaccination requirements and isolation policies in place), allowing CLH to have the ability to hire a full staff and have boat tours available for the summer. CLH will still submit a COVID Operations Plan for 2022 for Spring Operations, Summer Operations and Housing with contingency plans should cases rise, and with policies in place to protect both employees and visitors from the disease.

**A COVID-19 operations plan was submitted by CLH and accepted by the NPS. CLH reported 19 cases of COVID-19 among staff during 2022. Cases were reported as required. CLH also had to respond to local mask mandate requirements due to elevated CDC community levels.**

- Projects slated for completion in 2022
  - o The NPS is expecting to see project proposals for both the Mazama Camper Store and Rim Dormitory to be reviewed in 2022, hopefully leading to project initiation.
  - o The lodge roof replacement is slated to start on April 1st and continue through July 2022. The NPS is excited to have this project completed and hopefully the winter water damage issues that have been consistent for many years will be mitigated with this project.

**Project proposals were received for Rim Dorm but were incomplete. A project proposal was not received for the Mazama Camper Store. The Lodge roof replacement was completed. There were a number of issues with the execution of the project. The Lodge roof continues to experience water infiltration issues post-project completion.**

- Boat tour resumption and new boat plans. Boat house improvements.
  - o Boat tours have been tentatively approved to run for 2022, barring any hiring issues with boat captains or any issues with the boats after having sat unused for years. CLH has continued its progress with fabricating the new boats that should be ready to run in the next few years. The NPS is excited to see what CLH provides for future visitors to the lake.

**Boat tours did not commence until August and only operated a little over three weeks. No boathouse improvements were made. The development of the new boats did advance through the project approval stage. Delivery is anticipated in 2023.**

- Additionally, we hope to see improvements in the areas of Operational Performance and Public Health continue as CLH managers continue to refine these operations based on lessons learned over the past three years. Priorities should be guided by contractual requirements and the results of this AOR, with input from NPS concession managers.

**Improvements were not observed in these areas.**

- Although the concessioner is also required to provide lodging, food and beverage, and retail services at the Chateau in Oregon Caves National Monument, these services were not provided in 2021 as the Chateau was closed due to an ongoing NPS project to rehabilitate the historic structure to meet life, health, safety and accessibility standards. The Chateau will remain closed through 2022.

**Information only.**

**2023 Focus Areas**

- Completion of Energy and Water Conservation and Solid Waste Reduction Measures (Table follows this narrative).
- Adherence to CLH-submitted timelines for remaining CFIP and PPIP projects.
  - o Initiation of Rim Dormitory construction during 2023.
  - o All other projects are proposed to be completed by 2025. Project milestones must be established and adhered to during 2023.
  - o The delays in executing these projects will result in higher-than-expected costs associated with projects, as well as higher LSI balances through the duration of the contract. Upon the completion of the Rim Dormitory Rehabilitation (planned for 2023), delivery of new tour boats, and receipt of cost projects for the Mazama System Service Station project, it will be necessary to re-assess the remaining required contract required investments to see if reconsideration is necessary.
- Delivery of new Tour Boats.
  - o New tour boats to be delivered in 2023
  - o This PPIP project that has been pending since the beginning of the contract. The NPS and CLH are both excited to see this project to completion. The replacement

of the vessels is long overdue, and the Service hopes to see an increase in visitor satisfaction, safety, and program accessibility, and a decrease in environmental impacts from the project.

- Resumption of all required services.
  - o All COVID-19 related operational change approvals have been rescinded. All original contract service requirements are in place. Table service shall resume at the Lodge and single-use dishware is no longer authorized at Annie Creek.
- Improvements continue to be needed in the areas of Asset Management, Operational Performance, and Public Health as CLH managers continue to refine these operations based on lessons learned over the past four years. Priorities should be guided by contractual requirements and the results of this AOR, with input from NPS concession managers.

### **Accomplishments or Outstanding Work**

In the Spring of 2022, (b) (6) was hired onto the CLH team as the new Environmental Sustainability Manager for the property. Since her arrival, she has made exceptional strides in helping CLH become more compliant with the environmental compliance requirements set forth in the contract and continues to meet those goals. She has gone above and beyond to help CLH be more environmentally conscious, from improved waste diversion rates to working on finding grants and funding in order to improve Aramark facilities in aiding in environmental conservation. The Crater Lake NPS staff are happy to have (b) (6) as part of the local team and a collaborative resource for the NPS to work with in order to increase environmental standards across the park.

The park appreciated the support of CLH staff in providing boxed lunches and other support for numerous park VIP visits. CLH managers were always willing to accommodate groups which was valuable in ensuring park partners and supporters had a positive experience at Crater Lake. Aramark management also participated in visits from the National Park Service Director, DOI staff and Congressional delegations.

The NPS also appreciates CLH temporarily accommodating a webcam on their network when the NPS camera failed in February of 2022. The Crater Lake camera is very popular, and we receive many complaints when the camera experiences issues.



**Concession Contract CC-CRLA004-18 Energy and Water Conservation and Solid Waste Reduction Measures**

Category	Contract Requirements	Contract Due Date	Completed	Element of a Better Offer	Location	New Due Date
Energy Efficiency	Replace all steam cookers in all kitchens with Energy Star rated models	Within one year of the Contract effective date	Completed	Yes	pg H-8	No dedicated steamers on property
Energy Efficiency	Concessioner must conduct an energy use audit to establish baseline energy use	10/31/2020	Completed 6/29/22	Yes	pg H-17	10/31/2022
Energy Efficiency	Concessioner must install remotely monitored energy sensors in relevant Crater Lake facilities (35 in total)	10/31/2020	Not to the Service's knowledge	Yes	pg H-17	10/31/2023
Energy Efficiency	The Concessioner must provide an annual Greenhouse Gas Emissions Report to the Service based on the international ISO 14065-1, summarizing all sources and sinks of greenhouse gas emissions, all physical changes implemented to achieve energy reduction during that reporting year, and estimated energy saved based on actual use from energy use monitoring systems	Annually by January 31	No report provided to Service As of 2/23/22 - Concessioner given additional time to work with contractor to establish initial report No template available from Aramark	Yes	pg H-17	First report to be delivered 1/31/2022
Exterior Lighting	Replace all incandescent, fluorescent and compact fluorescent lights with energy efficient LED lighting systems that meet Energy Star criteria	Within one year of the Contract effective date	75% compliance, new fixtures needed for Mazama Dorm lights and Rim dorm needs to be converted	Yes	pg H-6	12/31/2022
Interior Lighting	Replace all incandescent, fluorescent and compact fluorescent lights with energy efficient LED lighting systems that meet Energy Star criteria	Within one year of the Contract effective date	90% compliance, final conversions to be completed with Mazama Camper Store Project	Yes	pg H-6	12/31/2022
Solid Waste Reduction	Install an organic digester (Enviropure or equivalent) at Annie Creek restaurant, Rim Village café, and Chateau kitchen	Within one year of the Contract effective date Plan for installation within 90 days of Contract effective date	Not to the Service's knowledge	Yes	pg H-8	To be determined through discussion with NPS - impacts to wastewater system are a concern Process should be started 2022
Solid Waste Reduction	The Concessioner must implement a "Zero landfill" program	Within one year after the Contract effective date	Not completed but program in place	Yes	pg H-16	Implement in 2022, full implementation by May 2023
Solid Waste Reduction	Conduct a solid waste audit	7/31/2019	Completed July 2022	Yes		10/31/2022
Solid Waste Reduction	Reduce solid waste disposal by 75%	Within one year after the Contract effective date	Not to the Service's knowledge	Yes		Increase recycling to 20% by September 30, 2022, 75% by October 31, 2023
Solid Waste Reduction	Annual Waste Stream Report	Annually by January 31	Completed first on 5/4/22			First report due 1/31/2022
Water and Energy Efficiency	Replace all ice machines with properly-sized, Energy Star rated, air cooled ice machines that use less than 50 gallons of water per 100 pounds of ice produced	Within one year of the Contract effective date	Completed Fall 2022	Yes	pg H-8	12/31/2022
Water and Energy Efficiency	Install in all employee housing washing machines that meet WaterSense water and Energy Star energy conservation criteria	Within one year of the Contract effective date	Yes	Yes	pg H-9	N/A

Water and Energy Efficiency	Achieve U.S. EPA "Energy Star Partner" Status for Crater Lake Operations	Within three years of the Contract effective date	Completed 7/28/22	Yes	Enroll by July 1, 2022. gain status by May 1, 2025
Water and Energy Efficiency	Develop and provide to the Service, a water conservation management plan that identifies the physical change initiatives, operational changes, continuous search for new technologies, employee engagement, and annual conservation goals. The plan must include a water footprint management system based on international standard ISO 14046 the Concessions must use the U.S. EPA/US DOE water savings calculator and report results to the Service by January 31 annually	Plan due within 120 days of the Contract effective date, reports due annually by January 31st	Completed, report submitted November 2022	Yes	Plan by 5/1/2022, First report due January 31, 2023
Water Efficiency	Install dishwashing machines that meet or exceed WaterSense conservation criteria in Annie Creek restaurant, Rim Village Café, and Chateau Kitchen	Within one year of the Contract effective date	Yes	Yes	N/A
Water Efficiency	Replace Camper Store laundry machines with the highest WaterSense rated water use efficient units sized for the anticipated loading per wash	Within one year of the Contract effective date	Not to the Service's knowledge	Yes	12/31/2022
Water Efficiency	Install low-flow WaterSense pre-rinse spray valves in every kitchen and food preparation area	Within one year of the Contract effective date	Yes	Yes	N/A
Water Efficiency	Replace all fixtures in public restrooms (including urinals), food service areas, employee housing, campground comfort stations, shower facility and maintenance areas with low flow WaterSense compliant fixtures	Within one year of the Contract effective date	Complete except Mazama Camper Store and Rim dorm, to be addressed with renovations	Yes	12/31/2022
Water Efficiency	Concessioner must conduct a comprehensive leak inspection every year prior to the main operating season to identify all leaks and make repairs prior to opening	Annual	yes	Yes	Annually in the spring as facilities open for the season
Water Efficiency	Replace all Crater Lake Lodge and Mazama Village Cabin guest room shower heads, bathtub faucets, bathroom sink faucets, and toilets with low flow WaterSense compliance fixtures	Within one year of the Contract effective date	Yes	Yes	N/A
Water Efficiency	The Concessioner must conduct a comprehensive water use audit of all assigned buildings at Crater Lake and then document baseline usage to measure water conservation progress	7/31/2019	Complete, report submitted 6/29/22	Yes	10/31/2022
Water Efficiency	The Concessioner must develop and use a computer-based Water Conservation Initiative Monitoring Tracking System, which will document in detail every existing water device removed by manufacturer, including model number and nominal flow rate, and the water conservation (WaterSense) device installed with the same information, including the date of replacement		Not to the Service's knowledge	Yes	10/1/2023
Water Efficiency	The Concessioner must install remotely monitored water use sensors at each of the ten Mazama Cabin four-plexes, in each public restroom, employee housing dormitories, food service kitchens, Mazama Camper Store laundry and shower, the Mazama Campground comfort stations, and the Chateau (at least 45 sensors across the listed locations). Concessioner must remotely record total water use on a daily basis for each water flow monitoring device throughout the Contract term		Not to the Service's knowledge	Yes	10/1/2023

Water Efficiency	The Concessioner must provide to the Service by January 31 of each year an Annual Water Conservation Report for the previous year, summarizing in detail all physical changes implement to achieve conservation of water during that reporting year and estimated water saved based on actual use from water-use monitoring systems	Annually by January 31	First report submitted 6/29/22	Yes	pg H-17	1/31/2023
Water Efficiency	The Concessioner must have an active membership in the Green Restaurant Association for third-party verification of its water conservation goals and achieve 3 star certification at all locations by December 31, 2022	12/31/2022	Yes All 3 restaurants are currently one star certified so far (as of June 2022)	Yes	pg H-17	Enroll by July 1, 2022, complete certification by October 31, 2025
Water Efficiency	Concessioner must move all housekeeping laundry services outside the Area	Within one year of the Contract effective date	Yes	Yes	pg H-17	Completed - laundry sent to AUS in Medford

**United States Department of the Interior - National Park Service**  
**Form 10-AOR - Annual Overall Rating Report**

Year of Operation: 2023

Park: Crater Lake National Park  
 Concessioner Name: Crater Lake Hospitality, LLC  
 Contract Number: CRLA004-18

Contract Term Effective Dates: 11/1/2018 through 10/31/2030  
 Concessioner DBA: \_\_\_\_\_

**Table 1: AOR Score**

Category	Scores	Rating
Administrative Compliance (10-ADM)	46.7	Unsatisfactory
Operational Performance (10-OPR)	48.8	Unsatisfactory
Public Health (10-PHP)	84.0	Marginal
Risk Management (10-RMP)	33.3	Unsatisfactory
Environmental Management (10-EMP)	30.4	Unsatisfactory
Asset Management (10-AMP)	16.7	Unsatisfactory

AOR Score

43.3

Rating

Unsatisfactory

Superior = 90 – 100  
 Satisfactory = 70 – 89  
 Marginal = 50 – 69  
 Unsatisfactory = ≤49

**This AOR had been rated as Unsatisfactory. An Unsatisfactory AOR constitutes grounds for termination of the concession contract.**

**Notes:**

- The final AOR score is the average of all applicable category scores, unless capped because of Marginal or Unsatisfactory Program scores.
- In accordance with 36 CFR 51.74, when a concessioner's AOR is unsatisfactory for one year or is marginal for two consecutive years, it constitutes grounds for termination of the concessioner's contract. Concessioners with a right of preference in contract renewal may also lose that preferential right if they were rated unsatisfactory for any one year or marginal for two or more consecutive years.
- If the Concessioner receives an Unsatisfactory for any program, the final AOR score is capped at 69 and final AOR rating cannot exceed Marginal.
- If the Concessioner receives a Marginal for any program, the final AOR score is capped at 89 and final AOR rating can not exceed Satisfactory.
- If a periodic evaluation (10-OPR) has not been completed for the contract during the year of operation, the final AOR score is capped at 89 and final AOR score can not exceed Satisfactory.

**Table 2: Superintendent Approval / Signature**

**Superintendent Approval / Signature**

**Instructions:** The park superintendent has the authority to adjust the final concessioner AOR rating. Please use the space below to enter the final superintendent-approved rating. If the rating has been altered from the calculated rating (shown above), please also include notes to explain why the change occurred. Please see Tab "Instructions and TOC" for instructions on signing AOR.

Superintendent Approved Rating

Unsatisfactory

**Narrative** (explain reasoning for any changes made by the superintendent)

Superintendent's Signature



Digitally signed by CRAIG

ACKERMAN

Date: 2024.01.24 17:16:11 -08'00'

Date

Concessioner Signature

(to signify receipt of rating)

\_\_\_\_\_

Date

\_\_\_\_\_

**Table 3: Evaluation Narratives**

**Evaluation Narratives**

**Instructions:** Narrative assessment and comments on the Concession Annual Overall performance for the year are mandatory. Please use the outline below to organize the narratives. Enter "N/A" under outline headers which are not applicable.

If you wish to attach a separate document to this Workbook as supporting materials, please see the instructions located on Tab "Instructions and TOC". Refer to any attachments in the space provided below. Please also use attachments if your text does not fit inside the boxes below.

*Hint: To start a new paragraph in the comments area, hold the ALT key and hit enter twice, then continue typing the next paragraph.*

<p><b>CFIP / Construction / Repair and Maintenance Reserve or Rehab Projects</b></p>	<p>In March of 2022, the NPS sent a letter notifying Crater Lake Hospitality (CLH) that none of the Concession Facility Improvement Program (CFIP) projects had been fully executed. In that letter, the Service requested that by May 20, 2022, CLH provide the NPS with a new plan and timeline for completing the CFIP projects to contractual requirements with a project completion deadline of calendar year 2025. That letter also served as a reminder to CLH that CC-CRLA004-18 Sec. 1 Term of Contract states, "If the Concessioner fails to complete this [Concession Facilities Improvement Program] to the satisfaction of the Director within the time specified, then this Contract shall be for the term of five (5) years until its expiration." A project list was received from CLH via email on 7/4/2022, that did not show how CLH would complete the projects as requested. After additional requests clarifying what information was needed, CLH sent another project schedule update on February 18, 2023. The NPS reviewed the schedule; however, the schedule did not sufficiently address CFIP timelines to justify any of the Director's discretionary extension of the contract term outlined in Section 1 and was not accepted by the NPS. The concessioner subsequently missed its proposed milestones outlined for initiation in 2023.</p>
<p><b>Leasehold Surrender Interest / Possessory Interest</b></p>	<p>No LSI projects were initiated or completed in 2023. Two projects, the Rim Dormitory Rehabilitation, and the Mazama Fuel Station underground storage tank and pump replacement, were discussed throughout the year. However, due to insufficient project packages for Rim Dorm, and not receiving the Mazama Fuel Station project statement until December 22, 2023, neither project was started during 2023.</p>
<p><b>Franchise Fees</b></p>	<p>All franchise fees were paid on time for 2023.</p>
<p><b>AFR</b></p>	<p>The 2022 AFR was submitted on time during this rating period.</p>
<p><b>Insurance</b></p>	<p>Insurance documents were not submitted to the NPS when coverage was renewed. The Certificates of Insurance were provided after they were requested by the NPS in December 2023. The NPS submitted certificates of insurance to Northport Affiliates, an insurance auditor contracted by the NPS, and the auditors noted their findings in January 2024, that the policies were compliant with contract requirements.</p>
<p><b>Risk Management</b></p>	<p>CLH's Risk Management program was rated unsatisfactory based on several issues and concerns during 2023. Risk Management training for staff was inadequate. For example, the NPS found it necessary to reiterate proper emergency reporting procedures to concessioner staff on multiple occasions, and the concessioner improperly relied on NPS personnel to train their boat staff in safety and operational procedures. Reporting of emergency incidents and injuries was inconsistent throughout the rating period. The observed inoperable condition of AEDs further evidenced an inadequate risk management program, as equipment was not regularly inspected or maintained. For more specific information on the Risk Management Program, please see 10-RMP.</p>
<p><b>Environmental Management</b></p>	<p>Environmental Management throughout 2023 for CLH was not conducted in accordance with applicable laws and regulations or contract requirements resulting in impacts to park resources from a sewage overflow as well as high-risk 'close calls' with fuel management. There were incidences of fuel discharges, including at the Cleetwood Cove upper fuel tank and most notably, the 10,000-gallon vaulted tank at Crater Lake Lodge, with tank #1 leaking an unknown amount of diesel fuel (estimates from tank records are around 4,500 gallons) into the vault. Contributing factors to these fuel spills include insufficient training of new concession maintenance staff, failure to perform preventative maintenance on the tanks and tank systems, inadequate monitoring of the tank systems, and an overall lack of adherence to the Concessioner's documented environmental plans and operating procedures. The diesel fuel release at the Lodge resulted in an investigation and notice of violation from the Oregon Department of Environmental Quality. The after-action report by Oregon Department of Environmental Quality (OR DEQ) State On-Scene Coordinator (SOSC) (b) (6) stated, "Despite clear knowledge of an ongoing diesel release, no documented action was taken for approximately five days. The lack of timely response action, while thousands of gallons of diesel actively released over five days, is negligence by the facility operator." The Concessioner's failure to holistically review, update, and improve its environmental management program following the significant fuel spill is demonstrated by, and may have contributed to, subsequent program failures such as the Cleetwood Cove fuel spill.</p> <p>A sanitary sewer overflow (SSO) occurred in July of 2023, with the cause determined to be a grease blockage in the sewer line. Subsequent investigation revealed CLH grease interceptors at the Crater Lake Lodge restaurant and the Rim Cafe had not been cleaned and maintained as required, were full or nearly full, and there were likely blockages in the lodge system impacting the operation of the interceptor, all of which led to uncontained grease release into the sewer. The concessioner's management staff at the regional level were unwilling to remediate the SSO; it was only when the matter was escalated via a letter to CLH President at that time, (b) (6) that CLH initiated corrective action. In the intervening time from the discovery of the SSO to remediation, the concessioner did not comply with the NPS request to adjust operations to mitigate the amount of grease entering the wastewater system. This incident demonstrated a failure to maintain an environmental management program that protects park resources. For more information on these incidents and the Environmental Management Program, please see 10-EMP.</p>
<p><b>Public Health</b></p>	<p>There were several issues concerning public health for the 2023 season, most notably at the Crater Lake Lodge (please see section 10-PHP for details). Despite being required to develop a corrective action plan after the marginal rating during their public health inspection, the cleanliness and food safety issues persisted throughout the entire season as documented in subsequent periodic evaluations and public health inspections. In addition, there were issues with refrigeration units at several facilities, most notably at the Rim Cafe. At the Rim Cafe, one of the open fridges containing grab-and-go food was not holding temperature (food items were temped at 50 degrees during the Rim Cafe Food and Beverage Periodic Evaluation). This unit was not repaired until after the summer season was over. Moreover, the concessioner has still not addressed the unauthorized changes to the Rim Cafe kitchen that included the improper removal of a hand washing sink. These failures to correct public health violations and the persistent year-over-year trend of less-than-satisfactory public health scores present a risk to visitor safety at the Concessioner's operations. In addition to their public-facing operations, the NPS documented public health concerns in their employee dormitories. In the Rim Dormitory, there was only one standard-sized residential refrigerator provided for all non-management staff in the building (up to 70 employees). This unit was found so full that it was struggling to hold safe temperatures. NPS evaluators found issues with all refrigeration units in the facility with one unit only cooling to 57 degrees, a significant food safety risk. All the employee food in that unit had to be discarded. CLH employees stated this issue had been persistent throughout the season and reported to CLH management, however, it was not resolved until after the periodic evaluation for the dorms was completed.</p>

<p><b>Asset Management</b></p>	<p>The assets assigned to CLH at Crater Lake have experienced a decline in condition as documented through the numerous and increasing number of maintenance-related deficiencies in periodic evaluations each year throughout the contract. During 2023, there were at least two separate instances of pipes bursting and causing significant water damage to Crater Lake Lodge. These were the direct result of a lack of proper winterization procedures. Drywall, plumbing, and fire suppression systems were damaged in these incidents. The condition of the Rim Dormitory building has continued to decline and the volume of multiple repeat deficiencies in building conditions resulted in a score of zero on the 2023 Periodic Evaluation for the facility. Project plans, the CMPR, maintenance plans, or maintenance records were lacking in detail needed to evaluate and track an asset management program. Due to consistent turnover in maintenance staff and a lack of institutional knowledge or standard operating procedures, NPS staff had to repeatedly request annual inspection documentation, including annual fire inspection reports, backflow reports, and other documents before it could identify a CLH employee that could successfully provide the requested information for NPS records. The NPS had to provide and explain contract documents and standards related to asset management to new concessioner staff, demonstrating insufficient internal training provided by CLH and its parent company. Although the concessioner had committed to implementing a CMMS program in 2023, the program was never fully implemented and the lack of maintenance records over the past five years makes it impossible to accurately estimate the condition of CLH-assigned facilities or to plan for their maintenance needs.</p>
<p><b>Administrative Compliance Reporting</b></p>	<p>The concessioner received an unsatisfactory score for administrative compliance primarily based on deficiencies related to the provision of services and operations, concessioner personnel, concession facilities, and indemnification and insurance (please see section 10-ADM for details). While most monthly reporting requirements were met, some reports were late. The Concessioner did not meet its contract requirement to provide the NPS with certificates of insurance not later than 30 days after the renewal date of coverage, which is a special attention item due to the importance of maintaining insurance coverage. Employee lists were not received for May and June of 2023, and July's list did not contain accurate information.</p>
<p><b>Annual Visitor Use Statistics / Utilization Data</b></p>	<p>There were a total of (b) (4) overnight stays at the concessioner's facilities, (b) (4) of those stays were at the Crater Lake Lodge, and (b) (4) were at Mazama Campground and Cabins. The boats saw a total of (b) (4) passengers during the 2023 season, up over 2022 due to the slightly longer boat season and more daily tours, including Wizard Island shuttles and Wizard Island tours.</p>
<p><b>Problems / Issues and Resolution</b> (include outstanding problems/issues and intended resolution)</p>	<p>Significant issues were noted with the CLH operation throughout 2023. Extensive turnover in both hourly and management staff in May 2023 made the operating season difficult, as staffing never recovered and there was no time to train staff that were eventually onboarded. The concessioner's procedures for continuity of operations seemed inadequate to ensure successful visitor services. Concessioner staff on the park level asked the NPS to provide them with critical documents the concessioner should already have immediate access to, including the contract, past AORs, past periodic evaluations, and Public Health inspections. Otherwise stated, the NPS has no obligation to train concessioner staff on the contract and its requirements, yet significant NPS time and effort was spent doing so.</p> <p>The park expects CLH would be aware that in a remote, seasonal concession operation such as CRLA, staff turnover, shortages, and recruitment challenges will occur each season and management must prepare for and mitigate these variables. Many of the operational issues and compliance failures outlined in this AOR reflect a failure of CLH and its parent Aramark to apply sufficient management resources to ensure successful operations, despite multiple challenges of the current season coming on the heels of two consecutive years of less-than-satisfactory Annual Overall Ratings.</p> <p>Several other issues and problems are noted throughout the subsections of this AOR. Please reference other sections for area-specific issues.</p>
<p><b>Accomplishments or Outstanding Work</b></p>	<p>In 2023, CLH delivered on its 2020 contractual obligation to bring new tour boats into service. The delivery of boats may have been achieved earlier in the contract term if CLH had taken a more proactive approach to project management throughout the design and build process. For example, CLH relied on a possible waiver from the US Coast Guard the agency ultimately declined to issue.</p>
<p><b>Future Plans for Concession Operation(s)</b></p>	
<p><b>Visitor Satisfaction</b></p>	<p>Visitor satisfaction for CLH's services varied widely depending on the location and operation. In general, visitors were satisfied with services at the Mazama Cabins and Annie Creek Restaurant and Gift Shop. There were some complaints about the check-in process at the campground, with visitors stating there were long lines or no guidance from staff, and several complaints regarding the poor condition of restrooms and overflowing garbage cans. Other visitors complained that the process for getting their 50% discount for their Access Pass or Senior Pass was complicated and receiving refunds often took a prolonged amount of time (CLH's policy for these passes is to charge full price at booking and refund 50% after check-in, which is convoluted as well as out of compliance with the contract as stated in Exhibit B, Section 11)F)(4).</p> <p>There was very little visitor review for Rim Cafe, the Mazama Camper Store, or the Mazama Fuel Station.</p> <p>The NPS received a significant number of visitor complaints on its visitor information line concerning a lack of information regarding when boat tours would open and what services would be available.</p> <p>The Crater Lake Lodge had mixed reviews regarding customer service, with many visitors being either satisfied with staff interactions or frustrated due to the lack of information provided by staff and apparent staff apathy. A large number of complaints came in regarding CLH's handling of the multiple power outages that the park experienced in the early half of the summer season, citing lack of planning, lack of communication with guests, apparent confusion with staff, and limited amenities offered due to the outage. As a note, the Lodge has a generator that provides limited power during power outages in order to run kitchen refrigeration systems, lights, the fire alarm, and the boilers. Another operation that received significant visitor dissatisfaction was the Lodge dining room. Visitors complained about several issues, including difficulty in making reservations for the restaurant, lack of variety on the menus, poor quality or preparation of food served, and high prices.</p>

**Final Remarks:**

Overall, the performance of the concessioner was unsatisfactory during 2023. Crater Lake Hospitality has achieved only one satisfactory overall rating in the five years of the contract term. NPS staff have invested considerable time and effort to help CLH achieve successful operational performance and meet contractual obligations such as environmental management, risk management, and facility management, but the concessioner continues to fail to demonstrate improvement. Systemic issues pervade each of the program areas evaluated in this annual overall rating document. The NPS remains concerned that that CLH and its parent company Aramark have been unable to demonstrate an ability to effectively meet their performance obligations under the contract.

**United States Department of the Interior - National Park Service**  
**Form 10-ADM - Administrative Compliance Report**

<b>Park:</b> <u>Crater Lake National Park</u>	<b>Concessioner DBA:</b> _____
<b>Concessioner Name:</b> <u>Crater Lake Hospitality, LLC</u>	<b>Year of Operation:</b> <u>2023</u>
<b>Contract Number:</b> <u>CRLA004-18</u>	

**Instructions:**  
For each element (row), use the drop-down or type in Column F (yellow) to specify if the element is either 1) in compliance ("Yes"), 2) not in compliance ("No"), or 3) not applicable ("N/A") for the concessioner under evaluation. If the element is either not in compliance or not applicable, use the "Remarks" box at the bottom of the form to provide an explanation.

**Notes:**  
- Elements marked with an asterisk (\*) represent "Special Attention Items." See comments at the bottom of the page for more information on how that affects scoring.  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.  
- For 8.B., use the concessioner's due date for their 2022 Annual Financial Report to complete the evaluation. If the 2022 AFR is not available or another year is used for any reason, please indicate the AFR year in the Remarks section below.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
1. Services and Operations	1.1*	All required services were provided by the Concessioner.	No	Three required services opened late, out of compliance with CLH's operations schedule plan submitted in October 2022. NPS reviewed the operations plan and schedule with CLH management multiple times throughout the winter and spring. CLH was informed that they would be out of contractual compliance if services were not opened on time. This performance issue was also rated "No" in the 2022 AOR due to facilities and services not opening as scheduled. The Mazama Village campground opening was delayed by a month because CLH did not prepare for snow removal in compliance with Exhibit H, Part B, Section 1)D)(3) and did not have adequate staffing in place to operate. Boat tours were delayed by two months due to wiring and mechanical issues on the new vessels and CLH's failure to obtain a waiver for design choices that did not meet USCG requirements. The Mazama Village Service Station was late opening by five days due to CLH not scheduling inspections in a timely manner and then had to be shut down for five days due to a failure to demonstrate staff were properly trained on required safety measures as required by Oregon statute. Late opening and changes to announced operating days impact visitor plans and safety, as concession services are especially critical given the park's remote location. The delayed openings in 2023 are additionally concerning because they are the result of the concessioner's failure to comply with contract requirements put in place to ensure timely opening (snow removal) and safe operations (USCG compliance, proper training to dispense fuel).
	1.2*	All services provided by the Concessioner were authorized by the Contract.	Yes	
2. Concessioner Personnel	2.1	The Concessioner established and implemented policies and procedures for pre-employment screening, hiring, training, employment, review of employee conduct, and termination of employees in accordance with the Contract.	No	Per contract Exhibit B, Section F)(5)(c), Background Checks, the Concessioner must ensure that appropriate background checks are performed on all employee hires as appropriate for the position. These may include: wants/warrants check, local criminal history check, federal criminal records check, national multijurisdictional database and sexual offender search, social security number trace, and driving history check. The Concessioner must not hire an individual if they show any active wants or warrants (current fugitive from justice). During law enforcement response to employee altercations, rangers discovered that two Concessioner employees had active warrants and one was taken to jail. During 2023 there were several law enforcement cases involving employee fights and harassment, and early in the operating season, these centered around employees hired through a local staffing agency. CLH responded by ceasing the use of this agency within the first few weeks of the season. However, employee conduct remained a consistent issue throughout the year with continued reports of harassment, assault, drug use, and theft of goods. This has been a repeat issue for CLH operations and was noted on last year's AOR. Early in the season, the NPS received an anonymous complaint from a CLH employee that onboarding and job orientation were not being provided to employees. The interim general manager was asked about this via email on June 5th. A response was received that noted challenges with the intake process but did not directly address the concerns. A response from Aramark's Corporate Human Resources Director on June 16 confirmed that the employee complaints were valid and noted that employee arrivals had not been coordinated, there were issues with the Aramark onboarding system, and orientations were not occurring. NPS informally interviewed employees and learned that most training was being received on the job due to the significant turnover of CLH management staff.
	2.2	The Concessioner was in compliance with Applicable Laws relating to employment and employment conditions including those in the Non-Discrimination Exhibit of the Contract.	Yes	The NPS is aware of a pending employee complaint to the State of Oregon concerning CLH employment practices. However, that complaint has yet to be adjudicated so this element is evaluated here as a 'Yes.'

	2.3	The Concessioner developed and implemented appropriate training programs for employees in accordance with the Contract.	No	<p>There were several operational areas where the Concessioner's employee training programs were demonstrably inadequate, including fuel services, food service, and maintenance.</p> <p>Fuel Services: The Mazama Village Service Station was closed by NPS June 2-5 due to CLH failure to provide proof of staff trained in proper operational and emergency procedures. CLH did not provide verification that a Class A/B operator was designated for the Mazama Village Service Station as required by Oregon Law (OAR 340-150-0210). This certification ensures a staff member that has training in UST operation, compliance, and spill response. CLH also did not provide proof of a training record that provided evidence of Class C operator training. NPS directed CLH to close the Mazama Village Service Station until CLH could demonstrate compliance with all applicable laws and regulations related to dispensing fuel to the public from an underground tank.</p> <p>Food Services: Per Exhibit B, Section 11)C)(6)(a) of the contract, CLH must provide at least one full-time certified food safety manager on duty at food service locations at all times. The manager must have a current certificate as a ServSafe Food Protection Manager by the National Restaurant Association or an equivalent certificate. All food service employees must have a current food handler's card issued by a state, county, or local health department. During NPS inspections, CLH food service operations were found to be operating without a certified manager on duty and without proof of food handler's cards. The park raised these issues with CLH via email in June 2023 and the HR manager committed to sending a list of staff and their food safety certification information. This information was never provided.</p> <p>Maintenance: An employee injury occurred when a maintenance employee without appropriate training was working on a plumbing fixture, failed to turn off the water supply, and was struck by a projectile. None of the maintenance employees were trained on how to shut off the building's water supply, resulting in the building flooding and needing to be evacuated.</p>
3. Legal, Regulatory and Policy Compliance		Has the concessioner received a violation(s) of any Applicable Laws? If no, move to Section 4.	Yes	One of the 10,000-gallon vaulted diesel fuel tanks located at Crater Lake Lodge rusted through and released an estimated 4,500 gallons of diesel fuel into the concrete vault secondary containment in August 2023. The Oregon Department of Environmental Quality (ORDEQ) informed CLH via an August 31, 2023, letter that it violated OAR 340-142-0040(d), which requires reporting to the Oregon Emergency Response System (OERS) when a containment system or container holding oil or hazardous material is physically compromised, and the amount spilled could be 42 gallons or greater over a 24-hour period – the reportable quantity. Reporting was required when CLH failed to meet all the conditions in OAR 340-142-0040 (4) which includes the condition that fuel spills be cleaned up in less than 24-hours. CLH initiated cleanup within five days, during which time the tank continued to release diesel fuel, and the cleanup took 48 hours.
	3.1	i. Did the Concessioner inform the park superintendent?	N/A	The concessioner did not have an opportunity to inform the superintendent prior to the park receiving notification from the Oregon DEQ.
		ii. Did the Concessioner rectify the violation(s) in a timely manner?	No	The concessioner showed little urgency in acknowledging the spill, taking action to address the situation, and identifying the full environmental impact. The release of the fuel began on August 9th, and the spill was not reported to the DEQ until August 22nd. The lack of proper reporting and timely cleanup was the basis of the violation, however, CLH did not engage with the environmental regulator to address concerns of environmental contamination until the regulator required them to conduct subsurface and water sampling.
		iii. Was the violation resolved and closure documentation submitted to the park?	No	Response and corrective action required by DEQ is ongoing. DEQ has requested a subsurface investigation plan and a surface water sampling plan for review and approval, which was completed. The DEQ authorized discontinuing surface water and wellhead sampling on November 8, once the soil sampling results were evaluated. In its after-action letter of January 8, 2024, DEQ noted that the CLH cleanup contractor had not provided receipts for final waste disposal or a spill cleanup report from CLH's tank services contractor. DEQ and the NPS require a final report of work performed by their environmental engineering contractor for this release response. The closure documentation for this violation should include all the actions taken by CLH as requested by DEQ, all correspondence with DEQ, and the closure memo from DEQ when received. Additionally, documentation on actions taken by CLH to resolve the inadequacies in their environmental management program and SPCC plan highlighted during this incident.
4. Concession Facilities and Government Personal Property	4.1	The Concessioner operated only within the Assigned Land and Concession Facilities as identified in the Contract.	No	CLH was discovered storing retail inventory and other items in an area of the Rim Café building (tunnel between Rim Café and the 1928 building) that was not within CLH's land assignment. This area is an emergency egress that needs to remain clear. CLH also installed storage hangers onto the walls of this area where it is not authorized to operate. NPS staff notified CLH of this issue in October 2023 directing them to remove all items from the area and to repair the walls, but this was not addressed until late December.
	4.2	Government personal property assigned to the Concessioner was maintained in good and operable condition, and property returned to the NPS for disposition if no longer serviceable.	Yes	
	5.1	Any request for leasehold surrender interest was made in accordance with the requirements of the Contract.	N/A	
	5.2	Is there a Concession Facilities Improvement Program applicable to this rating period? If no, move to Section 6.	Yes	Four CFIP projects are contractually required for this contract: Rehabilitation of Rim Dorm, Annie Creek Restaurant Improvements, Rim Village Café Building Improvements, and Mazama Village Camper Store Improvements.



5. Construction or Installation of Real Property Improvement	5.3	The Concessioner submitted plans and specifications for approval by the Superintendent.	No	No designs have been received for the Annie Creek Restaurant. CLH submitted revised plans for the Rim Dorm in a new project proposal submitted to NPS in November 2022. NPS responded with comments from NPS architects in March 2023 noting plans were insufficient to meet contract specifications. An updated plan was submitted by CLH in December 2023. A revised Camper Store design was submitted to NPS in February 2023. The NPS provided initial feedback, and no further follow-up from the Concessioner has occurred.
	5.4	The Concessioner started the project on time.	No	The original contract completion deadlines for the Annie Creek restaurant improvements, Rim Village Cafe Building Improvements, and Mazama Village Camper Store Improvements were May 2020, and the Rim Dorm Rehabilitation was March 2021, extended to March 2022 via a letter sent by the NPS in June 2020. Subsequent communications from the NPS requested updated project timelines and completion dates for these projects. No new timeline to complete the delinquent projects has been accepted by the NPS. No construction of CFIP projects has started.
	5.5	The Concessioner completed the project on time.	No	None of the four required CFIP projects have been completed.
	5.6	The Concessioner submitted documentation to confirm that expenditures of the program were in accordance with the Contract.	No	No documentation of expenditures has been provided to the NPS despite the concessioner engaging Architecture and Engineering consultants to produce plans and specifications.
6. Tracking and Payment of Required Fees	6.1*	If a maintenance expense is required, the Concessioner expended the minimum amount required by the Contract during this rating period.	N/A	
	6.2*	The Repair and Maintenance Reserve was spent correctly.	N/A	No RMR spending was approved in 2023.
	6.3*	The Concessioner submitted all required franchise fees and required reports on time, including the monthly franchise fee report.	Yes	
	6.4	If applicable, interest assessed on overdue franchise fee amounts was paid.	N/A	
	6.5	Handicraft sales claimed as exempt from franchise fees were supported by appropriate documentation, e.g. invoices bearing a certification by the supplier that the items were Authentic Native Handicrafts.	N/A	No handicraft sales claimed for 2023.
7. Indemnification and Insurance	7.1*	The Concessioner provided the superintendent with a current Certificate(s) of Insurance.	No	Property insurance expired 6/1/2023, commercial / auto/ workman's comp expired 10/1/2023, Underground Storage Tank insurance expired 5/1/2023. Only UST insurance was provided upon policy expiration. Other COI Certificates of Insurance were provided in December when requested by the NPS. The Operating Plan of the contract states, "Certificates of Insurance. The Concessioner must provide annual updated statements and certificates of insurance not later than 30 days after the insurance(s) renewal date(s) and in accordance with this Contract."
	7.2*	The Certificate(s) of Insurance documented that the Concessioner was compliant with all insurance coverages required in the Contract. This compliance may be determined through a review by a third party consultant.	Yes	The Certificates of Insurance, when provided, were found to be compliant with contract requirements by Northport Affiliates, an insurance auditor contracted by the NPS.
8. Accounting Records and Reports	8.1	If this is the first year of a Contract, the opening balance sheet was submitted as required by the Contract.	N/A	
	8.2*	The Concessioner submitted the Annual Financial Report (AFR) due within this rating period.	Yes	
	8.3*	The Concessioner submitted the AFR on time.	Yes	
	8.4*	The AFR was audited by an independent licensed or certified public accountant, if required.	Yes	
9. Other Reporting Requirements	9.1	The superintendent may require the Concessioner to submit reports and data regarding its performance under the Contract. Some common reporting requirements are listed below.		
		i. Visitor Use Statistics/Operating Reports	Yes	
		ii. Customer Comment Reports	Yes	
		iii. Hours of Operation	No	The concessioner did not submit updated hours of operation reports to the NPS in a timely manner. At the beginning of the season, CLH changed Annie Creek Restaurant and Gift Shop operating hours without prior approval from the NPS. In August 2023, CLH changed the operating hours for the both the Mazama Village Cabins and the Campground without required written notice and advance approval of the NPS.
		iv. Management Listing	No	The management listing was not regularly updated despite significant turnover in leadership positions.
		v. Inventory of Waste Streams	Yes	
		vi. Employee Handbook	N/A	CLH is only required to submit this to the NPS if handbook is updated. CLH has not updated its employee handbook since 2018.
vii. Any additional pertinent reports	No	Updated active employee lists were not received for May or June 2023. The list that CLH provided for July 2023 included staff from both Union Creek (a separate operation from Crater Lake Hospitality but also operated by Aramark on Forest Service-administered lands) and Crater Lake. Per the contract, Exhibit B, page B-12, an active employee list must be provided to the NPS monthly.		
10. Assignment, Sale or Encumbrance of Interests	10.1	If the concession was sold or transferred during this rating period, the Concessioner fulfilled all obligations stipulated by the Contract.	N/A	
	10.2	If the name of the business has changed in the past year, give new name below:		

11. Sub-concessions	11.1	If there were any agreements with third parties to provide services authorized or required in the Contract, list the services they provided below:		
	11.2*	All sub-concessions were approved by the superintendent.	N/A	
12. Utilities	12.1	List utility services provided by the NPS for the Concessioner (if there are no utilities provided by the NPS, enter N/A):	Water and Wastewater	
	12.2*	The Concessioner paid for the utility services provided in a timely manner.	Yes	
	12.3*	If a utility add-on was approved, the Concessioner submitted all required reports, including the distribution of add-ons and reconciliation reports.	N/A	
13. Advertising and Promotional Materials	13.1	The Concessioner obtained NPS approval for all promotional material prior to publication or distribution.	Yes	
	13.2	If the Concessioner used the Concessioner Mark, the Concessioner obtained approval prior to using the Mark and followed the guidelines for using the Mark.	Yes	
	13.3	The Concessioner's websites and social media sites contained accurate and relevant information.	No	The Concessioner did not maintain accurate season dates and hours of operation on its website. At the start of the season, the website displayed outdated information regarding the Lodge opening date and dining information. Later in the season, the website showed the Lodge and fuel station as open when they had already closed for the season. This led to visitor confusion, including issues with visitor vehicles running out of gas in the park because they believed the fuel station was still operating.
14. Contract Transition	14.1	If the Contract was in transition, the Concessioner managed operations appropriately to achieve an orderly transition of operations and avoided disruption of services, including adhering to the provisions stipulated in Exhibit J "Transition to a New Concessioner,"	N/A	
15. Other Requirements	15.1	The Concessioner was in compliance with all terms of the contract, not otherwise addressed in the administrative compliance, service or program-specific reviews.	No	<p>Per contract Exhibit B, Section 3)A(4), CLH must fill and replace any vacant or open key positions in a timely manner, but no later than 60 days after the key position becomes vacant or open, to ensure efficient operations. Key positions include the General Manager, Maintenance/Engineering Manager, and other departmental managers. CLH's Maintenance Manager position was vacant from July 2022 to early March 2023, which exceeded 60 days as required by the contract.</p> <p>Per the contract, the concessioner shall be subject to all applicable laws and must obtain required permits. Crater Lake Hospitality did not submit a timely Special Use Permit application for their helicopter operations. As a result, they began their operation before the permit was executed. CLH also failed to submit a timely permit application for core drilling the containment vault impacted by the diesel fuel release described elsewhere in this AOR.</p> <p>Per the contract Exhibit B: Operating Plan F) (2) The Concessioner must maintain a tracking system for passes that are issued and ensure appropriate distribution. In July, the NPS learned that CLH employees were not able to acquire entrance passes and that the passes, which are accountable property, had been lost. CLH did eventually find the passes but had not been tracking who they were issued to, in violation of the contract. A spreadsheet of pass issuance data was eventually provided to the NPS on October 5, 2023, however, the documentation was incomplete, did not account for all passes issued, and did not note the recovery of passes from any employees who were no longer employed by CLH.</p>

**ADDITIONAL NOTES / COMMENTS**

Administrative compliance was an ongoing challenge for CLH this year. Complete turnover at the management level led to a lack of institutional knowledge of operations that impacted the Concessioner's ability to deliver visitor services in accordance with the Contract. Critical documentation, including the contract itself, past AORs and Periodic Evaluations, basic NPS Concessions operations resources, and other documents, had to be provided to CLH management by NPS staff several times. CLH's progress in implementing required CFIP and PPIP projects, already past the original completion dates in the contract, was limited. Inadequate staffing was evident throughout the operation. The NPS also deemed it necessary to send a letter to the CLH President regarding the lack of planning by regional and local CLH staff to address the visitor service needs and anticipated facility impacts during the annular solar eclipse. CLH had to be reminded that they are fully responsible for all land and assets assigned to it, and per their contract must provide staff to manage the anticipated surge in visitation, monitor and protect the facilities, and address issues that may arise.

Table 2: Scoring

Scoring			
Program Area	Score (%)	Program Area	Score (%)
1. Services and Operations	50.0%	9. Other Reporting Requirements	50.0%
2. Concessioner Personnel	33.3%	10. Assignment, Sale or Encumbrance of Interests	n/a
3. Legal, Regulatory and Policy Compliance	0.0%	11. Special Provisions – Sub-concessions	n/a
4. Concession Facilities and Government Personal Property	50.0%	12. Special Provisions – Utilities	100.0%
5. Construction or Installation of Real Property Improvement	0.0%	13. Advertising and Promotional Materials	66.7%
6. Tracking and Payment of Required Fees	100.0%	14. Contract Transition	n/a
7. Indemnification and Insurance	50.0%	15. Other Requirements	0.0%

8. Accounting Records and Reports		100.0%		
<b>Total - All Program Areas</b>				
# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Item)	# N/A	# Applicable Requirements
14	16	2	12	30
Administrative Compliance Score		46.7		
Adjusted Administrative Compliance Score		46.7		
Rating		Unsatisfactory		
<p><i>Notes:</i></p> <p>1) If 1-2 Special Attention Items are not in compliance, the Administrative Compliance Score is adjusted to Marginal and capped at 69.</p> <p>2) If 3+ Special Attention Items are not in compliance, the Administrative Compliance Score is adjusted to Unsatisfactory and capped at 49.</p>				
<p>Superior = 90 – 100  Satisfactory = 70 – 89  Marginal = 50 – 69  Unsatisfactory = ≤49</p>				

**United States Department of the Interior - National Park Service**  
**Form 10-OPR - Concession Operational Performance Report**

Park:	Crater Lake National Park	Concessioner DBA:	
Concessioner Name:	Crater Lake Hospitality, LLC	Year of Operation:	2023
Contract Number:	CRLA004-18		

**Instructions:**  
 Fill in the (yellow) highlighted cells in the table below with the following information:  
**Location** – List the concession location/facility being evaluated. **(Note: Location MUST be filled out in order to activate the scoring on this form.)**  
**Service Type** - List the service type being evaluated (Note: If a single location/facility has multiple service types, the facility should receive multiple rows in the table, one for each service type).  
**Weighting** - Add a weighting value based on the importance of the service to the park: 1 = low importance, 2 = medium importance, or 3 = high importance. **(Note: Weighting MUST be filled out in order for the form to work properly. If the user wishes to have all locations/services have equal weights, simply select the same weighting for each.)**  
**Periodic Evaluation (PE) Score(s)** – For each location/service type, enter the score (1-5) the concessioner achieved in PEs performed during the evaluation year. (Note: If multiple PEs were performed during the year, enter them in columns F, G and H).  
  
 If you require more than the 20 rows in Table 1, click the "+" button on the left side of this worksheet (near row 141) to add additional rows.  
 If you require more than 120 rows in Table 1, please contact [cs\\_cm\\_helpdesk@nps.gov](mailto:cs_cm_helpdesk@nps.gov) for a new version of the AOR Workbook.  
 If you have completed more than four PE's during a given year, please contact [cs\\_cm\\_helpdesk@nps.gov](mailto:cs_cm_helpdesk@nps.gov) for a revised 10-OPR form with additional columns.  
  
**Notes:**  
 - For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
 - To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

If no periodic evaluations were completed for this Contract during this rating period, enter "X" in the box on the right.	
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**Note: If no periodic evaluations were completed, please explain why in the "Comments" box below.**

**Table 1: Facility Evaluation**

**Hints:**  
 - To delete unnecessary/extra rows from the table below, select the desired rows to delete and hold "Ctrl + Shift + D" on your keyboard.  
 - DO NOT insert individual rows into the table below.

Location / Facility	Service Type	Weighting	Periodic Evaluation Score(s)					Weighted Score
			PE #1	PE #2 (if app)	PE #3 (if app)	PE #4 (if app)	Average PE Score	
Crater Lake Lodge	Lodging – Midscale	3 - High	2				2.0	6.0
Crater Lake Lodge	Employee Dining Rooms	2 - Medium	3				3.0	6.0
Crater Lake Lodge	Food and Beverage – Upscale Casual Dining	3 - High	1	1			1.0	3.0
Rim Cafe	Food and Beverage – Quick Service	3 - High	2				2.0	6.0
Rim Cafe	Retail	2 - Medium	4				4.0	8.0
Rim Cafe	Rentals – Recreational Equipment	2 - Medium	5				5.0	10.0
Rim Dormitory	Employee Housing	2 - Medium	0.001				0.0	0.0
Annie Creek Restaurant	Food and Beverage – Fast Casual Dining	3 - High	1				1.0	3.0
Annie Creek Retail	Retail	2 - Medium	3				3.0	6.0
Mazama Camper Store	Retail	2 - Medium	2				2.0	4.0
Mazama Camper Store	Automobile Services	2 - Medium	3				3.0	6.0
Mazama Camper Store	Laundry	3 - High	3				3.0	9.0
Mazama Camper Store	Showers	3 - High	3				3.0	9.0
Mazama Campground	Campgrounds	3 - High	3				3.0	9.0
Mazama Cabins	Lodging – Basic	3 - High	3				3.0	9.0
Cleetwood Marina	Water – Guided Tours	3 - High	2				2.0	6.0

Use the space below to justify/explain the weighting system adopted in the table above.  
 Rim Dorm PE was a zero but entered as 0.001 so as not to cause error with the Excel formula programmed to divide by the number of PEs.

**Table 2: Scoring**

Scoring											
<b>OPTIONAL</b> - If you would like to see the operational performance broken by service type, insert all service types evaluated at the concessioner below in the highlighted cells (from 2nd column in table above - only list each service type once)											
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:20%;">Service Type</th> <th>Average Weighted Score</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Service Type	Average Weighted Score									<p>Operational Performance Score</p> <div style="border: 1px solid black; padding: 5px; display: inline-block;">48.8</div>
Service Type	Average Weighted Score										
	Superior = 90 – 100 Satisfactory = 70 – 89										


Rating

Unsatisfactory

Marginal = 50 – 69  
Unsatisfactory = ≤49

**ADDITIONAL NOTES / COMMENTS**

2023 represented the third year of decline in the concessioner's average periodic evaluation score. In all operations CLH struggled to maintain adequate staffing at all levels of the organization as observed through periodic evaluations across several visitor service types, most notably: 1) in early summer, when multiple employees resigned (in the cases where the NPS was informed by employees about their reasons for leaving, lack of management support, stress and burnout, lack of compensation, understaffing, management not communicating or addressing issues, no plan for success, and questionable labor practices were among the reasons cited); and 2) at the end of the summer season, when staff on J1 visas had their seasons ended four to six weeks before the end of the main season and student hires returned to college, leaving CLH unable to adequately staff operations. During the Fall 2023 winter operations Rim Café was inadequately staffed and employees were unable to clean the facility, conduct adequate snow removal, or offer the core menu for a period of time. CLH did not adequately prepare the staff they did have to be successful in their jobs. Complaints were received from employees about not being greeted on their arrival, not being immediately assigned housing, and not being provided a basic orientation. After pressing the acting General Manager for a response to these complaints, they were found to be valid by the Aramark Human Resources Director. The NPS received reports of staff sleeping in the public areas of the dorms because they had not been assigned rooms. CLH reported that they did not have enough beds for the staff that they hired and they needed to rekey the Rim Dormitory before occupancy.

There continue to be concerns with periodic evaluation follow-up and with the overall condition of facilities. Multiple repeat deficiencies were identified by NPS evaluators across most service types. Notably, the Rim Dorm received a zero on its periodic evaluation due to the extremely poor condition of the building, safety and health code violations, and the trash surrounding the exterior of the building which included bedding, plastic bottles, and piles of cigarettes during a fire ban. At the Crater Lake Lodge, evaluators noted issues with landscape damage from snow removal and roof contractors, public restrooms were found in need of cleaning and with leaking toilets, the fire alarm was found in supervisory mode, an unapproved HVAC installation was discovered, and issues were noted with guest room cleaning and condition. During the periodic evaluation for the campground, NPS staff noted overflowing trash cans throughout the campground, a wildlife and sanitation issue. Later in the operating season the park received multiple visitor complaints about these same wildlife and sanitation issues at the campground. During its Periodic Evaluation, the Annie Creek Restaurant was noted to have a limited menu, limited healthy food options, no front-of-house manager on duty, several issues with cleanliness both in the dining room and kitchen, and a handwashing sink in the kitchen with no hot water. Managers on-site at the restaurant remarked to NPS staff that staffing was inadequate. The condition of roofs on several buildings, including at Annie Creek, the Mazama Cabins, Rim Cafe, and Mazama Dormitory has declined to a point where water damage is likely to occur. Paint has been neglected on almost all buildings, including the Crater Lake Lodge, Rim Cafe, Mazama Camper Store, Mazama Cabins, and Annie Creek Restaurant. ABA accessibility findings with relatively simple corrective actions have not been closed. These condition issues have repeatedly occurred on periodic evaluations over the past several years of operations. Lodge dining reservations were a source of frustration for visitors. CLH had proposed moving to the OpenTable platform in January 2023 but never implemented the change. Instead, CLH continued to have a reservation policy but tasked the front desk agents with maintaining the reservation book. This added an extra task to an already understaffed segment of their organization and resulted in an overly complex system that made securing reservations difficult, even for Lodge guests. As a result, CLH abandoned its "reservations required" policy by the end of the season.

The delivery of the new tour boats in late June, which should have been the successful completion of the PPIP process, turned into an extended challenge requiring additional work on-site to complete the boats' construction and to modify the design, which had not received a waiver from the U.S. Coast Guard (USCG) for non-compliance with USCG requirements. The on-site work involved drilling many holes into the aluminum boat hull to install railings. This work was done outdoors and without attempts to contain waste, and difficult to recover aluminum shavings littered the ground on Wizard Island. These issues delayed the start of boat tours until August 21, 2023. CLH struggled to staff the boat operation for the short season and their lead captain failed to understand or execute the responsibilities of his position and often took an antagonistic posture when interacting with the NPS. In an email on September 8, the lead captain emailed the NPS and demanded to know what solutions the NPS had to provide a second crew member on a tour. The NPS had to remind the captain that while NPS interpretive rangers can serve as crew members when available, it is always CLH's responsibility to staff boats, NPS also received reports of CLH tour guides providing inaccurate information to visitors during tours. The boat tour operation was also hampered by multiple issues with the reservation system, which would have been prevented with advance planning and staff training. The boat tour season ended with the sinking of a CLH skiff into Crater Lake after the NPS tried to contact CLH to let them know their skiff was being tossed about by high wind conditions. NPS retrieved the skiff engine from the lake to prevent contamination.

The NPS has repeatedly raised operational quality concerns at the weekly park meeting with concession management, through Periodic Evaluation and Public Health inspection results, and via letter to the CLH President. Improvement is repeatedly promised but has not been observed.

**United States Department of the Interior - National Park Service**  
**Form 10-PHP - Public Health Program Evaluation Report**

Park: _____	Crater Lake National Park	Concessioner DBA: _____
Concessioner Name: _____	Crater Lake Hospitality, LLC	Year of Operation: _____
Contract Number: _____	CRLA004-18	2023

**Instructions:**  
 Facility Information: All facilities may not be inspected during the course of the year, however, it will be important to provide documentation on the facility information section to maintain accurate records. Food service operation types include restaurants/cafeterias, snack bars, grocery, pre-packaged, backcountry, vending, temporary, mobile, and other.

Inspection Information – Transfer the number of Satisfactory, Marginal, and Unsatisfactory (S, M, U) ratings from the Food Service Sanitation Inspection Report to this section. Calculations for the final score will automatically be made if using the form electronically. Just enter the number of Satisfactory inspections, number of Marginal Inspections, and number of Unsatisfactory Inspections. If the form is being completed manually, multiply the number of inspections in each category (S, M, U) by the following points: Satisfactory = 100, Marginal = 50, Unsatisfactory = 0. Total the number of inspections and the number of points and then, divide the total number of points by the total number of inspections for the final score.

Notes:  
 - For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
 - To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Facility Information**

FACILITY INFORMATION			
Facility Type	Number of Facilities	Facility Name(s)	Comments / Notes / Remarks
Restaurants/Cafeteria	3	Lodge Dining Room, Lodge EDR, Annie Creek Restaurant	The Lodge restaurant has been rated unsatisfactory for its first inspection of the season 4 times in the 5 years CLH has held the contract and has been rated marginal for its second inspection for the last 2 years.
Snack Bars	1	Rim Cafe	
Grocery	1	Mazama Camper Store	
Pre-Packaged			
Bar			
Backcountry			
Temporary (Identify)			
Vending			
Mobile			
Thermal Water			
Swimming Pools			
Other	1	Mazama Warehouse	
<b>Total Number of Facilities:</b>	<b>6</b>		

**ADDITIONAL NOTES / COMMENTS**

The Crater Lake Lodge restaurant began the operating season with an unsatisfactory public health score for the fourth year out of five operating years of the contract. In response, the NPS required CLH to develop and implement a corrective action plan to address the ongoing violations. Subsequent follow-up visits and the first Periodic Evaluation noted little to no improvement, noting many of the same food code violations observed during the initial public health inspection, in addition to new ones. Based on the findings of a June 29 reinspection, either there was no evidence that corrective actions were taken or, the actions were inadequate to prevent violations from reoccurring. The park followed up via email with CLH in July 2023 regarding outstanding public health concerns. In an email response, the Aramark Vice President of Operations NW dismissed the findings as differences in expectations and without acknowledging the documented FDA Food Code violations. The NPS was concerned that public health issues were not being addressed seriously and that CLH's own corrective actions were not being followed and sent a subsequent email to CLH to express this concern. The second PE conducted in August documented improvements but still observed issues with proper food storage, ware-washing, and grease management. The second public health inspection resulted in a marginal rating. During the Rim Café Periodic Evaluation in August, it was noted that one of the grab-and-go coolers with sandwiches/salads was not at an appropriate temperature (holding at 50 degrees Fahrenheit) and a significant amount of food had to be discarded because there was no record of when the food had been placed in the cooler. The issue with this cooler was known to CLH as it was a repeat issue that had been noted during the first public health inspection in June. CLH subsequently had the cooler repaired after this incident. Unauthorized changes to the Rim Cafe kitchen, which occurred in 2021 and included the removal of the hand washing sink, have not yet been addressed. This issue was raised with CLH management during the PE in August. Information about this issue is not being passed to new management, as noted on November 29th at a weekly meeting when the NPS had to review the situation again with new management staff who proposed installing yet different kitchen equipment in the space where the handwashing sink had been removed.

**Table 2: Inspection Information**

INSPECTION INFORMATION		
<b>Instructions:</b> Fill in the yellow cells below with the number of Public Health inspections that achieved the corresponding rating (e.g. for the first box, enter the number of inspections where the concessioner achieved a "Satisfactory" rating).		
	# Inspections	Points
# Satisfactory	10	1000
# Marginal	1	50
# Unsatisfactory	1	0
<b>Total</b>	<b>12</b>	<b>1050</b>

Public Health Score	87.5	Satisfactory = 85 – 100* Marginal = 50 – 84 Unsatisfactory = ≤ 49
Adjusted Public Health Score	84.0	
Rating	Marginal	

*Note: If concessioner received one or more Unsatisfactory inspections, the final public health rating cannot exceed Marginal and the score cannot exceed 84.*

**United States Department of the Interior - National Park Service**  
**Form 10-RMP - Risk Management Program Evaluation Report**

Park: <u>Crater Lake National Park</u> Concessioner Name: <u>Crater Lake Hospitality, LLC</u> Contract Number: <u>CRLA004-18</u>	Concessioner DBA: _____ Year of Operation: <u>2023</u>
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**Instructions:**  
 The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

**Notes:**  
 - For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
 - To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Program Area Evaluations**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
1. Risk Management Program (RMP) Scope	1.1	The RMP is documented, and its scope covers the ten risk management elements. Furthermore, the RMP scope addresses the risk management objectives and aspects applicable to the operation, including: <ul style="list-style-type: none"> <li>• legal requirements (Applicable Laws), contract requirements (including requirements contained in Exhibits), and safety best management practices</li> <li>• employee and visitor hazards</li> <li>• operational, facility and natural hazards</li> </ul>	Yes	
	1.2	The RMP establishes a safety policy for the organization. The policy indicates commitment to: <ul style="list-style-type: none"> <li>• compliance with Applicable Laws</li> <li>• providing a safe and healthful environment for employees, park staff and visitors to the extent possible</li> <li>• assigning responsibilities</li> <li>• providing staff and resources</li> <li>• monitoring performance</li> </ul>	Yes	
2. Responsibility and Accountability	2.1	The concessioner identifies a safety and health official, and documents this assignment in the RMP.	Yes	
	2.2	The concessioner identifies the risk management organizational and staff responsibilities, and documents this structure and assignments in the RMP.	Yes	
	2.3	RMP resources are developed, documented in the RMP, and applied; resources are adequate to execute the program. Resources include: <ul style="list-style-type: none"> <li>• personnel (e.g., number of staff, experience and skills)</li> <li>• facilities and equipment</li> <li>• information, documentation, and data management systems</li> <li>• agreements for support from outside contractors and agencies</li> <li>• training programs for concession personnel</li> </ul>	No	While the RMP documents resources, operationally, the resources available in 2023 were inadequate to execute the program. RMP responsibilities are designated to the General Manager however that position experienced turnover multiple times this operating season leading to a loss of institutional focus on ensuring adequate resources as evidenced by the multiple risk management failures that occurred and the staff's inability to respond appropriately to incidents that are addressed procedurally in the RMP.
	3.1	Managers and staff with safety and health responsibilities meet the qualification requirements defined in the contract and RMP. Competency requirements are defined by appropriate education, training, and experience.	No	The NPS has no evidence of CLH meeting any risk management training or competency requirements for managers. The NPS requested via email on June 5, 2023, that CLH provide a current staffing list of Food and Beverage employees and information on whether each employee had received the required, relevant training (Food Handlers License and /or Alcohol Server Education Class and Alcohol Service Permit). NPS also requested proof that at least one full-time food manager was on duty at food service locations at all times with a current certificate as a Serv Safe Food Protection Manager or equivalent. NPS followed up on June 8th and 13th but did not receive the requested information. NPS was able to determine through subsequent in-person inspections that the Serv Safe certificates were in place for some kitchen managers, but there are no tracking logs or records demonstrating that there were staff with the appropriate training and/or certifications on duty for all shifts.

3. Training	3.2	<p>A training plan is developed, documented in the RMP, and executed, and includes:</p> <ul style="list-style-type: none"> <li>• Defined training requirements for the safety officer and other personnel, including requirements to meet Applicable Laws, the contract, and the RMP.</li> <li>• Required training records, such as training materials, schedules, and participant records.</li> </ul>	No	<p>The concessioner's training plan did not include sufficiently defined training requirements for personnel with safety responsibilities or the need to identify and retain required training records. For example, Oregon state law, OAR 340-150-0210, requires that each regulated UST facility must employ Class A, Class B, and Class C operators who can properly operate and maintain the UST system and respond to events indicating emergency conditions and alarms caused by spills or releases from the UST system. Class C operators (e.g., facility attendants) must be trained before dispensing a regulated substance or assuming responsibility for responding to emergencies. Written verification of training completion for Class A, B, and C operators must be kept at the facility or readily available upon request and include: the UST operator's name, the date training was completed, and the name, site address, and DEQ's facility identification number for the UST facility that the UST operator serves. The RMP does not document a training plan describing how it would ensure appropriate staff obtain this legally required training, and CLH did not document that the required fuel service station Class C operator training was provided.</p>
	3.3	The concessioner has conducted and documented all training.	No	<p>The NPS has no evidence of CLH meeting any risk management training or competency requirements for its managers and staff. An example of a failure to conduct risk management training was the annual boat safety training. In addition to failing to update the safety procedures noted in section 4.1 below, CLH staff did not take ownership of the safety and operations training for their boat program and instead relied on the NPS to develop and deliver it to concessioner staff. This included both classroom and on-the-water training over several days. CLH boat operators were unprepared for emergency drills for their new vessels. CLH conducted one in-person employee safety training at the beginning of their season. Not all employees were present and CLH had no subsequent orientations for new employees during the operating season. Therefore, there was a significant cohort of CLH employees who did not receive the in-person safety training historically provided by CLH.</p>
4. Documentation and Operational Controls	4.1	<p>RMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws, the contract, and the RMP to ensure safe operations. Some plans and procedures may overlap with those in the EMP. Examples of operating procedures include:</p> <ul style="list-style-type: none"> <li>• procedures for the safe storage and handling of chemicals</li> <li>• procedures for embarking and disembarking visitors</li> <li>• procedures for safe equipment use</li> <li>• procedures for managing wildlife interactions</li> <li>• procedures for cancelling operations due to weather</li> </ul>	No	<p>Updated safety policies were not finalized for the new boats that were introduced in June 2023 before conducting tours. The NPS requested new safety policies and procedures for the boats, but only received a few updated emergency procedures. CLH redlined the existing boat operations plan, including striking all references to life rafts. CLH was uncertain it would receive a waiver from the USCG for the life rafts and ended up installing them. As a result, boat staff did not receive hands-on training on life raft deployment. Additionally, there was a documented report of a child under 2 years of age being allowed to board a tour boat and participate in a boat tour, which is prohibited within the CRLA Boat Operations Procedures in Exhibit B-1 to the contract for safety reasons ("Infants (under three years of age) are not allowed.") and was specifically addressed during the 2023 Boat Training at which all of the boat tour staff was present.</p>
	4.2	<p>RMP emergency plans and procedures are developed, documented (if applicable), implemented, maintained, and included or referenced in the RMP. These plans and procedures address requirements in Applicable Laws, the contract, and the RMP. Some plans and procedures may overlap with those in the EMP. Emergencies to be addressed include:</p> <ul style="list-style-type: none"> <li>• natural disasters (earthquakes, floods, tornados, hurricanes, etc.)</li> <li>• motor vehicle incidents</li> <li>• medical emergencies (visitors and employees)</li> <li>• fire (structural, motor vehicles, wildfires, etc.)</li> <li>• terrorism and law enforcement activities</li> <li>• accidents and fatalities (visitors and employees within park boundaries)</li> </ul>	No	<p>CLH does have emergency plans and procedures developed but they do not appear to be implemented. Several issues relating to fire alarms demonstrated the concessioner did not have adequate plans regarding fire emergencies. For example, failure to follow fire alarm reporting procedures occurred throughout the season including CLH employees silencing alarms without permission, not contacting the NPS when fire alarms were triggered, not informing the NPS promptly when fire alarms experienced component failures, and not monitoring fire alarm systems for issues. Additionally, feedback from park responders and visitors related to periods of power outages suggests that CLH would benefit from a stronger plan or better training related to emergency procedures and incident management. Procedures are not in place for motor vehicle incidents, terrorism, responding to fatalities, etc.</p>
	5.1	The RMP is available to staff and communicated throughout the concession organization so that personnel understand and can effectively implement the RMP.	No	When the NPS asked about the RMP in an early season discussion, CLH management was unaware of the program's existence.



5. Communications	5.2	The RMP addresses procedures for communicating hazards to visitors. The hazards may include: <ul style="list-style-type: none"> <li>• Activity-related hazards (e.g., white water rafting)</li> <li>• Natural resource-related hazards (e.g., bears)</li> <li>• Facility-related hazards and procedures (e.g., property evacuation maps)</li> </ul>	Yes	While the RMP references hazard communication procedures including mass emails and automated calls to visitors with reservations, and travel advisories posted to the NPS website, these communication methods were not utilized by CLH for hazards during 2023 to include poor air quality from wildfire smoke and power outages.
	5.3	Any visitor acknowledgment of risk is approved by the park. Waivers of liability are not used.	Yes	
	5.4	The concessioner's risk emergency plans are coordinated and agreements in place with other applicable parties such as the NPS, other federal, state, or local emergency response agencies.	Yes	Coordination plans were in place but there were several incidents during the seasons which demonstrated the plans were not being followed or updated to reflect system changes or lessons learned.
6. Reporting	6.1*	All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided to the NPS in accordance with the contract. Additional plans, reports, and other documentation are submitted to the NPS in accordance with the contract and RMP.	No	CLH did not provide the NPS with the USCG Certificates of Inspection for the new boats (as required in CLH's Risk Management Plan (pages 9-10 in management plan reports) despite several requests at weekly operations meetings.
	6.2*	Imminent danger and serious incidents are reported to the park in a timely manner in accordance with the contract and RMP.	No	RMP Section 1.10 addresses required reporting: "In accordance with the terms of the contract, all internal incident reporting shall be provided to the National Park Service in the event of any injury requiring medical attention beyond first aid, property damage more than \$300.00 dollars, any incident which affects area resources, any violations of state and / or federal laws, and / or any activation of the 911 emergency system," NPS has not received imminent danger or serious accident reports despite known employee and visitor injuries within the CLH land assignment that required medical attention beyond first aid. NPS was not informed of multiple visitor accidents at Rim Café in Fall 2023 which resulted in a broken arm, a broken leg, and a head injury. In addition to being out of compliance with its RMP, CLH's failure to report serious incidents is also out of compliance with the Contract. Contract Exhibit B, Section 12) A) 2) requires the concessioner to immediately report serious incidents, including (c) Employee or visitor injuries requiring more than first aid. An example of the concessioner's noncompliance with this contract requirement occurred when the CLH General Manager did not report a lost-time injury involving an employee who was burned until four days after the accident occurred (the accident occurred on May 16 and was reported on May 20).
	6.3	Annual reports include internal, park, and other regulatory agency risk data, and are submitted to the NPS in accordance with the contract and RMP.	No	RMP Section 1.7: A Risk Management Log will be maintained by the CLH General Manager and will be provided as a component of the National Park Service Annual Operations Report (AOR); or, if requested or as warranted, on a quarterly basis via the National Park Service Periodic Evaluations (PEs). The NPS has received no such logs.
7. Inspections and Corrective Action	7.1	Safety inspections are conducted as specified in the contract and RMP or as otherwise necessary to effectively manage operations safely. Formal and routine inspections are scheduled, conducted, and documented. The inspections are conducted by qualified personnel as described in the RMP.	No	Several AEDs were found with expired pads and the AED in the Rim Café (the only year-round operation) was found inoperable due to dead batteries. NPS periodic evaluations also found that CLH was not performing all fire extinguisher inspections monthly as required.
	7.2*	Imminent danger, serious, and non-serious hazard deficiencies identified by internal or external inspections are analyzed, corrected, or mitigated within the contract or RMP required timeframes. Any deviations from these timeframes are accepted by the park and documented.	No	Multiple incidents demonstrate that CLH did not analyze, correct, or mitigate imminent danger, serious, and non-serious hazard deficiencies identified during NPS inspections. The CLH RMP requires all deficiencies to be corrected "as soon as possible" and tasks the CLH general manager with "settling prompt and reasonable corrective action timeframes." Prompt and reasonable timeframes were not set nor were corrective actions made in a timely manner for several hazard deficiencies identified throughout the season. The battery for the Rim Café AED was not replaced for at least two weeks after the issue was discovered by NPS during a Periodic Evaluation. During inspections for the Crater Lake Lodge kitchen, fire doors adjacent to the basement prep kitchen were propped open, preventing them from closing in case of a fire. During one inspection, NPS employees removed door stops 4 times since no CLH staff had been informed why this practice is unsafe and not allowable. During another facility inspection in November, the same door was found to be propped open with cardboard, despite the presence of a functioning automatic release system magnet tied to the fire system holding the door open on its own. The emergency lighting system at the Rim Cafe failed in May. The system was inoperable for several weeks which resulted in the building having partial lighting in stairwells and no backup emergency lighting. When CLH finally addressed the issue, it bypassed the emergency system rather than repairing or replacing it. No plans to address this issue have been provided to the NPS. Accumulation of grease and debris on kitchen floors was a slip hazard. A park employee fell in the kitchen due to the slippery surface. Cleaning was an issue throughout the season. During Fall 2023, ice in front of the Rim Cafe and retail building and snow tunnel was not appropriately mitigated, resulting in several visitor fall injuries, including a broken arm, a broken leg, and a head injury, at least one of which have resulted in a tort claim filing, and another filing is pending.

8. Hazard Incident Investigations and Abatement	8.1*	Accidents/incidents are responded to in a timely and effective manner.	N/A	NPS has no basis for evaluation of CLH responses to incidents due to a lack of reporting.
	8.2	An investigation is conducted for every accident/incident. • The investigation includes an analysis to determine the cause. • Corrective action is taken to mitigate recurrences of the accident/incident.	No	RMP Section 1.12 requires: CLH classifies and responds to incidents based upon their severity as defined in National Park Service standards. Serious incidents are immediately reported to the National Park Service and serious incident investigations are conducted in coordination and conjunction with the National Park Service. Although serious incidents have occurred, no investigations have been coordinated with the NPS.
9. Management Review	9.1*	The RMP is reviewed at least annually, and updated as necessary. • The RMP review includes analysis of performance in each RMP element area to determine any systemic program failures (particularly failures that resulted in fatal or serious accidents/incidents or imminent danger hazard deficiencies) and non-compliance with Applicable Laws. • Systemic problems are addressed in RMP updates,	No	The 10-RMP evaluation on the 2022 AOR included findings of non-compliance; an RMP update would have been appropriate. However, the concessioner did not submit an updated RMP for 2023.
	9.2	The initial RMP is submitted to the park within the contract specified timeframe for review, and is accepted by the park. Any subsequent documented RMP updates are submitted to the park for review and acceptance.	N/A	No updates to the RMP were submitted to the Service by the due date of November 30, 2023
10. Other Contract Requirements	10.1	Contract-specific safety and health requirements not otherwise addressed in the RMP standards are met.	N/A	All known concerns regarding RMP requirements are noted in the evaluation items above.

\*Special Attention Item

ADDITIONAL NOTES / COMMENTS
CLH continues to fail to integrate risk management into its operations. An example of note this season was the delivery of the concessioner's new tour boats to Crater Lake. This is a high-risk operation that requires significant coordination. The operation, involving the use of a heavy-lift chinook helicopter, was poorly planned and last-minute. As of the Friday night before the planned delivery, CLH had not submitted their Special Use Permit application as they did not have all the details finalized. Due to their late submittals, park staff had to scramble to review the completed application and execute the permit. Despite the operation being under the operational control of the concessioner, the NPS staff had to work extra hours due to the lack of planning of the concessioner. Fortunately, the boats were delivered safely to Crater Lake, but they were not complete, so boat tours would not commence for several weeks. CLH also failed to protect its staff, guests, and park resources by not complying with applicable fire code requirements. Other issues have included CLH's failure to train its employees to maintain AED equipment for responding to visitor medical emergencies; failure to properly operate and maintain fire doors; failure to properly operate and maintain fire alarm systems; noncompliance with tour boat safety requirements; and failure to provide for employee oversight and accountability to create a culture of safety. Risk management concerns also extend to employee issues noted elsewhere in this AOR including improper disposal of cigarettes during fire ban periods, lack of oversight and security in employee dormitories, and the persistence of issues with employees that require law enforcement intervention.

Table 2: Scoring

Scoring			
Program Area	Score (%)	Program Area	Score (%)
1. Risk Management Program (RMP) Scope	100.0%	7. Inspections and Corrective Action	0.0%
2. Responsibility and Accountability	66.7%	8. Hazard Incident Investigations and Abatement	0.0%
3. Training	0.0%	9. Management Review	0.0%
4. Documentation and Operational Controls	0.0%	10. Other Contract Requirements	
5. Communications	75.0%		
6. Reporting	0.0%		

**Total - All Program Areas**

# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Item)	# N/A	# Applicable Reqs.
7	14	4	3	21

Risk Management Score	33.3	Superior = 90 – 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = ≤49
Adjusted Risk Management Score	33.3	
Rating	Unsatisfactory	

Notes:

- If 1-2 Special Attention Items are not in compliance, the Risk Management Score is adjusted to Marginal and capped at 69.
- If 3+ Special Attention Items are not in compliance, the Risk Management Score is adjusted to Unsatisfactory and capped at 49.

**United States Department of the Interior - National Park Service  
Form 10-EMP - Environmental Management Program Evaluation Report**

Park: <u>Crater Lake National Park</u> Concessioner Name: <u>Crater Lake Hospitality, LLC</u> Contract Number: <u>CRLA004-18</u>	Concessioner DBA: _____ Year of Operation: <u>2023</u>
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**Instructions:**  
 The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthful environment for visitors or employees.

**Notes:**  
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 - To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Environmental Management Program (EMP) Scope</b>	1.1	The concessioner's EMP scope (whether documented or undocumented) covers the environmental objectives and environmental management aspects applicable to the operation including: • legal requirements (Applicable Laws), contract requirements (including requirements contained in Exhibits), and environmental best management practices • facilities and operations • natural and cultural resources	Yes	
	1.2**	The EMP is documented.	Yes	
	1.3**	The EMP establishes the concessioner's environmental policy. The policy indicates commitment to: • compliance with Applicable Laws • protecting and conserving park resources and human health • assigning responsibilities • providing staff and resources • monitoring performance	No	While the documented plan states the concessioner's environmental policy, programmatically, the policy is not functionally established. The documented policy includes CLH's commitment to 'protecting and improving,' 'identifying opportunities for continual improvement year over year,' and 'complying with all legal and other requirements.' The concessioner's inadequate response to environmental audit findings, environmental incidents, and notices of violation do not demonstrate the establishment of a policy that commits the concessioner to the standard outlined in 1.3.
<b>2. Responsibility and Accountability</b>	2.1**	The concessioner must identify an environmental officer and/or program manager and document this assignment in the EMP. The environmental officer must meet the contract specified qualifications and requirements defined in the documented EMP.	Yes	
	2.2	The concessioner determines management and staff responsibilities as necessary to effectively manage environmental activities, and describes this structure and these assignments in the documented EMP (if applicable).	Yes	
	2.3	EMP resources are developed, documented in the EMP (if applicable), and applied; resources are adequate to execute the program. Resources include: • personnel (e.g., number of staff, experience and skills) • facilities and equipment • information, documentation, and data management systems • agreements for support from outside contractors and agencies • training programs for concession personnel	No	The EMP resources were not developed or applied adequately to execute the program. During environmental incidents, including the sanitary sewer overflow, the release of diesel fuel at Crater Lake Lodge, and the release of fuel at Cleetwood Cove. On-site CLH personnel did not have the qualification, training, or experience with CLH environmental policies, UST regulations, CLH's Spill Prevention Control and Countermeasures Plan, or other environmental plans and procedures cited in the CLH EMP. This was largely due to the lack of training programs for concession personnel sufficient to provide knowledge and understanding regarding CLHs environmental programs, including maintenance and operation of the fuel tanks. This resulted in failures in many areas covered by EMP plans, including fuel spills noted above, failure to properly store universal waste (fluorescent lamps), improper chemical storage, no knowledge of fuel loading and unloading procedures, not following kitchen grease management procedures, etc.
<b>3. Training</b>	3.1	Managers and staff with environmental management responsibilities meet qualification requirements defined in the contract and documented EMP (if applicable). Competency requirements are defined by appropriate education, training, and experience.	No	CLH's documented EMP shows responsibility for vehicle fueling and fuel unloading plans and procedures as the responsibility of the maintenance manager. These responsibilities were transferred to the sustainability manager upon the maintenance manager's departure without notification to the NPS. When a new maintenance manager was onboarded, that individual did not receive training on EMP standard operating procedures or required environmental plans and procedures (including the SPCC for the oil storage within CLH facilities) as evidenced by inadequate response to environmental incidents in 2023.

	3.2	A training plan is developed, documented in the EMP (if applicable), and executed; and includes: <ul style="list-style-type: none"> <li>• Defined training requirements for the environmental officer and other personnel, including requirements to meet Applicable Laws, the contract, and the EMP.</li> <li>• Required training records, such as training materials, schedules, and participant records.</li> </ul>	No	The Concessioner is unable to demonstrate that its environmental training plan was executed; the inadequate response by concession staff to fuel releases are lagging indicators of an insufficient training plan.
	3.3	The concessioner has conducted and documented all training.	No	The NPS requested training records be provided no later than January 22, 2024 and none were received.
4. Documentation and Operational Controls	4.1	EMP plans and standard operating procedures are developed, implemented, maintained, and included or referenced in the documented EMP (if applicable). These procedures address requirements in Applicable Laws, the contract, and the EMP to ensure protection of human health and the environment. Some plans and procedures may overlap with those in the RMP. Examples of operating procedures include: <ul style="list-style-type: none"> <li>• procedures for the storage and handling of chemicals</li> <li>• procedures for the management and maintenance of fuel</li> <li>• procedures for pesticide use</li> <li>• procedures for hazardous and solid waste disposal</li> <li>• procedures for weed and pest management</li> <li>• procedures for the protection of cultural and archeological resources</li> </ul>	No	The EMP states that CLH has plans and procedures for vehicle fueling, fuel unloading, flammable storage and handling, vehicle fuelling, and kitchen grease. The concessioner's ability to successfully implement these standard operating procedures was inadequate. As an example, improper chemical storage was noted on several PE's during the year. Additionally, critical procedures for the operation and maintenance of the underground fuel tanks are missing from the EMP.
	4.2	EMP emergency plans and procedures for environmental management are developed, documented (if applicable), implemented, maintained, and included or referenced in the documented EMP (if applicable). These plans and procedures address requirements in Applicable Laws, the contract, and the EMP. Some plans and procedures may overlap with those in the RMP. Emergencies to be addressed include: <ul style="list-style-type: none"> <li>• hazardous substance spill response</li> <li>• leaks from fuel storage tanks or other chemical storage areas</li> <li>• storm water contamination</li> </ul>	Yes	The CLH RMP minimally addresses hazardous substance spill response, leaks from fuel storage tanks, and storm water contamination as required in 4.1. The concessioner's ability to successfully operationalize these plans varied; deficiencies are noted elsewhere here.
5. Communications	5.1	The EMP is available to staff (if applicable), and communicated throughout the concession organization so that personnel understand and can effectively implement the EMP.	No	NPS staff have asked CLH staff about EMP procedures and CLH's staff have not been familiar with the EMP or known where to locate it.
	5.2	The EMP addresses procedures for communicating environmental controls and initiatives to visitors. These may include: <ul style="list-style-type: none"> <li>• Handling hazardous materials (e.g., fuel)</li> <li>• Handling waste (e.g., trash)</li> <li>• Natural resource or cultural resource impacts</li> <li>• Pest management (e.g., notification of pests if observed)</li> </ul>	No	The EMP states that "CLH will communicate our policy to our employees and the general public, and develop programs at each site to educate employees, visitors, and surrounding communities on the cultural and ecological significance of the site, as well as the protection of wildlife/native species. We commit to not only reach visitors to our operations, but also support the efforts of client and community organizations that preserve our nation's treasured lands and cultural attractions" yet does not establish any procedures to meet these goals.
	5.3	The concessioner's environmental emergency plans are coordinated and agreements in place with other applicable parties such as the NPS, other federal, state, or local environmental agencies.	No	Per the EMP, the General Manager is responsible for all communications with regulatory agencies such as the EPA, Oregon DEQ, and the USCG. CLH failed to communicate appropriately and adequately with these agencies in 2023. For example, during the August diesel spill release, CLH did not report to the Oregon Emergency Response System (OERS). The NPS is not aware of any other emergency plan coordination with outside parties. Plans have been coordinated with the NPS, however, CLH employees have consistently failed to follow these plans during 2023. Examples include improper response to emergency incidents and improper use of NPS public safety radio frequencies. Many of these failures are documented elsewhere in this AOR.
6. Reporting	6.1*	All documents, reports, monitoring data, manifests, notices and other documentation required to be submitted to regulatory agencies are submitted on time and in accordance with Applicable Laws. Copies of such communications are provided to the NPS in accordance with the contract. Additional plans, reports, and other documentation are submitted to the NPS in accordance with the contract and documented EMP (if applicable). These may include inventories of hazardous substance and waste streams.	No	A spill cleanup report was not provided by CLH's tank services contractor following the August 2023 diesel fuel release. Monitoring data related to both the above and underground fuel tanks is not referenced in the plan and data were not available for review when fuel releases from these tanks occurred. For example, documentation is missing for monthly monitoring of USTs, period inspections, and periodic testing for the UST system. Additionally, inspections and testing required by the concessioner's SPCC plan were not completed or made available to NPS or regulatory agencies
	6.2*	Notices of any discharges, release or threatened release of hazardous or toxic substance, material or waste are reported in a timely manner to the NPS in accordance with the contract.	Yes	The park was notified by CLH about the fuel spills; however, limited information was provided until NPS requested details surrounding the events. The sanitary sewage overflow was discovered by NPS staff.
	6.3*	Any written, threatened or actual notices of violation of Applicable Law from any environmental regulatory agency are reported in a timely manner to the NPS in accordance with the contract.	N/A	
	6.4	The NPS is provided timely written advance notice of, and the opportunity to participate in, communications with regulatory agencies regarding the concessioner's environmental activities in accordance with the concession contract.	No	The Concessioner did not notify the NPS of an ORDEQ SOSC visit on August 23rd related to the diesel release at the Crater Lake Lodge.

7. Monitoring, Measurement and Corrective Action	7.1	Environmental inspections are completed as required by Applicable Law, the contract, the documented EMP (if applicable), or as otherwise necessary to effectively manage environmental activities.	No	The concessioner was unable to demonstrate that AST inspections were completed in accordance with the concessioner's SPCC Plan. Specifically, there were no records of fuel vault integrity inspections, tests, repairs, or dewatering. Additionally, CLH had not appropriately cleaned and inspected grease interceptors at the beginning of the season, and, despite recommendations from an environmental engineering consultant, no evidence has been submitted to the NPS that the interceptors have received follow-up inspections.
	7.2*	Environmental deficiencies identified by internal or external inspections (e.g., NPS concession environmental audits, etc.) are analyzed, corrected, or mitigated within the timeframes designated by Applicable Law, the contract, documented EMP (if applicable), or inspection report. Any deviations from these timeframes are accepted by the park and documented.	No	Per the 2021 environmental report, CLH stated they would either install an automatic tank gauge (ATG) or conduct an alternate approved form of monthly release detection, such as static inventory reconciliation, for the Cleetwood Cove Underground Storage Tank. Neither was done. 10-EMP 7.2 was rated as compliant in the 2022 AOR with the understanding the concessioner was on track to address the 2021 environmental audit inspection finding; however, the concessioner did not execute corrective action. The environmental audit findings served as leading indicators of the environmental incidents in 2023, particularly around the fuel leaks.  CLH has not inspected the grease interceptors post-pump out as recommended by their environmental engineering consultant in July 2023. Additionally, when CLH had the grease pumping contractor on site, they were unable to access all the access ports due to CLH staff being unable to produce the Allen key to open it. CLH failed to coordinate with NPS staff to effectively and safely perform maintenance of the sewer lines associated with the grease interceptor system, leading to the lines not being thoroughly hydrojetted.
	7.3	Environmental incidents are responded to in a timely and effective manner to stop, contain, and remediate the incident. Investigations are conducted, and corrective actions are taken to prevent recurrences to the satisfaction of the NPS in accordance with the contract, EMP, and relevant regulations and NPS policies.	No	CLH did not uphold its contractually required responsibility to clean wastewater spills caused by its operation per Maintenance Plan Exhibit H, B)(3)(c). A sanitary sewer overflow was only appropriately responded to after the NPS sent a letter to the CLH president. CLH did not mitigate kitchen grease production as requested by the NPS until the grease interceptor could be cleaned. The Concessioner was ineffective in implementing corrective action to prevent recurrences of environmental incidents, as demonstrated by a repeat fuel spill (Cleetwood Cove) which occurred after the ORDEQ notice of violation was issued for Lodge Diesel release.
	7.4***	The EMP is reviewed at least annually, and updated as necessary. • The EMP review includes analysis of performance in each EMP element area to determine any systemic program failures (particularly failures that resulted in serious incidents of inspection deficiencies), and non-compliance with Applicable Laws. • Systemic problems are addressed in EMP updates,	Yes	
	7.5**	The initial EMP is submitted to the park within the contract specified timeframe for review, and is accepted by the park. Any subsequent documented EMP updates are submitted to the park for review and acceptance.	No	CLH submitted its annual EMP update on time, before November 30th, 2023, however, the park did not accept the EMP because it reflected an inaccurate record of the 2023 season. The EMP reflected no awareness of the 2023 environmental issues reported in this AOR and states on page 3, "For calendar year 2023, Crater Lake Hospitality has not received any violations." The EMP provides specific sections where CLH indicates it will report incidents and violations, yet none of the incidences identified in the AOR are mentioned in the EMP. In section 6 the EMP states the section "lists information for monitoring data, manifests, notice of discharges, notice of violations and timely communication with regulatory agencies," yet section 6.2 Notices of Discharges reports no discharges have been registered. Section 7.3 of the EMP provides a section to identify Environmental Incidents and it states, "No incidents recorded." The EMP commits to investigation, mitigation, after-action, performance analysis, yet fails to acknowledge areas of needed improvement and documented incidents from its 2023 performance.
	8. Other Contract Requirements	8.1	Contract-specific environmental requirements not otherwise addressed in the EMP standards are met.	No

\* indicates a Special Attention Item

\*\* indicates item is not applicable to Cat III contracts

**ADDITIONAL NOTES / COMMENTS**

In 2023, several serious environmental issues occurred throughout CLH operations within the park. The most serious of these is the August 2023 release of diesel fuel from the 10,000-gallon vaulted tank at Crater Lake Lodge, which required the response and engagement of Oregon Department of Environmental Quality (ORDEQ) and Environmental Protection Agency officials. In an after-action review letter from ORDEQ describing operational errors leading to and in response to the August 2023 release of diesel fuel, ORDEQ State On-Scene Coordinator (b) (6) stated, "Despite clear knowledge of an ongoing diesel release, no documented action was taken for approximately five days. The lack of timely response action, while thousands of gallons of diesel actively released over five days, is negligence by the facility operator." ORDEQ formally notified CLH of the corrective actions required for the Lodge diesel tank fuel release, CLH's inability to execute a sound environmental management program is illustrated by the fact that a subsequent fuel spill followed the August Lodge tank leak incident and after CLH was instructed to train their staff on environmental management and SPCC procedures. The spill occurred at Cleetwood Cove when the tank was emptied and closed for the season, and appropriate procedures were not followed.

The NPS discovered a sanitary sewer overflow in July 2023, releasing an estimated 5,000 gallons of raw sewage into the park and a creek. The NPS determined that the overflow was caused by a grease clog in the sewer line. Subsequent investigation revealed CLH grease interceptors at the Lodge restaurant and the Rim Cafe had not been cleaned and maintained as required and were full or nearly full, there were likely blockages in the lodge system impacting the operation of the interceptor, all of which led to uncontained grease release into the sewer. When requested by the NPS to perform sewage spill cleanup, CLH initially declined to do so. CLH also declined to eliminate fried foods from its menu until the grease interceptors could be cleaned when requested to do so by the NPS. CLH eventually agreed to clean up the sewage. However, the site was not fully cleaned until over a month after the overflow was discovered. The NPS requested that CLH inform the NPS when the contractor was near completion so the work could be evaluated by NPS staff. No notification was made, and upon inquiring about the clean-up status, CLH informed the NPS the contractors had already demobilized from the site. The NPS inspected their work and found it incomplete. CLH concurred that the work was insufficient and had to remobilize their contractor.

Energy and water efficiency improvements were an element of a better offer of the CLH proposal for this concession contract. CLH has consistently failed to meet the deadlines for implementing the measures it set for itself. The NPS has raised this issue repeatedly since 2022.

CLH has made some progress towards meeting its waste diversion goals through partnerships with Reach Incorporated, which recycles paper and wood pallets, and Stateline Compost, which composts an average of 2,220 pounds of kitchen food waste and BPI-certified compostable products monthly.

The severity of the environmental incidents caused by CLH is significant. The concessioner's environmental management program was insufficient in terms of both preventative measures and incident response. These incidents may have been avoided if the concessioner's training, monitoring, and inspection programs had been adequate. The concessioner's inability to maintain compliance with all applicable environmental laws and NPS policies, operationalize standard operating procedures, correct environmental audit deficiencies, and conduct appropriate follow-up to environmental incidents illustrate a lack of compliance with contract requirements and insufficient care in protecting the park's resources and environment.

**Table 2: Scoring**

Scoring			
Program Area	Score (%)	Program Area	Score (%)
1. Environmental Management Program (EMP) Scope	66.7%	6. Reporting	33.3%
2. Responsibility and Accountability	66.7%	7. Monitoring, Measurement and Corrective Action	20.0%
3. Training	0.0%	8. Other Contract Requirements	0.0%
4. Documentation and Operational Controls	50.0%		
5. Communications	0.0%		

**Total - All Program Areas**

# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Item)	# N/A	# Applicable Reqs.
7	16	2	1	23

Environmental Management Score	30.4	Superior - 90 - 100 Satisfactory = 70 - 89 Marginal = 50 - 69 Unsatisfactory = ≤49
Adjusted Environmental Management Score	30.4	
Rating	Unsatisfactory	

Notes:  
 - If 1-2 Special Attention Items are not in compliance, the Environmental Management Score is adjusted to Marginal and capped at 69.  
 - If 3+ Special Attention Items are not in compliance, the Environmental Management Score is adjusted to Unsatisfactory and capped at 49.

**United States Department of the Interior - National Park Service**  
**Form 10-AMP - Asset Management Program Evaluation Report**

<b>Park:</b> <u>Crater Lake National Park</u>	<b>Concessioner DBA:</b> _____
<b>Concessioner Name:</b> <u>Crater Lake Hospitality, LLC</u>	<b>Year of Operation:</b> <u>2023</u>
<b>Contract Number:</b> <u>CRLA004-18</u>	

**Instructions:**  
The evaluator will review the each element listed below and determine if the concessioner is in compliance. A "Yes" indicates that the concessioner is compliant with an element and a "No" indicates that there are meaningful deficiencies found. A "meaningful" deficiency is one that is important enough to impair a concessioner's ability to provide a safe and healthy environment for visitors or employees.

**Notes:**  
- For detailed instructions on inserting a PDF or other document into this Workbook, refer to the "Instructions and TOC" tab.  
- To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

**Table 1: Program Area Evaluation**

Program Area	ID	Element	In Compliance? (Yes, No, N/A)	Observation / Comment
<b>1. Annual Concessioner Maintenance Plan (ACMP)</b>	1.1	The ACMP is updated annually and submitted on time.	Yes	The park received an annual plan from CLH on January 15, 2023, in the form of a Concessioner Maintenance Plan and Report (CMRPR is the report's title per the contract's maintenance plan exhibit).
	1.2	The ACMP is accurate and complete	No	The Concessioner Maintenance Plan and Report contained a list of projects that were a mixture of completed projects in prior years and those pending for the future. The plan did not adequately prioritize projects and included unrelated topics, such as personal property. The scope of the plan did not sufficiently address known deferred maintenance and periodic evaluation finding-related issues, as only two projects were noted. Estimates provided for projects and work orders did not represent the total amount of facility maintenance expense or facility investment that could be expected during the year.
	1.3	Projected maintenance expenditures are provided.	Yes	
<b>2. Inspections</b>	2.1	Inspections were performed on schedule.	No	While some inspections were conducted, the Concessioner's inspection program did not meet the maintenance plan requirement set forth in Contract Exhibit H: "The Concessioner must conduct inspections of Concession Facilities no less than annually to determine compliance with this Maintenance Plan and to help develop future Maintenance requirements." Specifically, the contract requires the concessioner conduct annual inspections of building roofs, doors, and windows, siding walls and trim, structural ventilation, snow and ice melt systems, foundations and exterior walls. Issues were identified with all of these systems at almost all facilities over multiple years during NPS periodic evaluations. The concessioner has seldom recorded the NPS-observed issues prior to the NPS inspection, nor does the concessioner express prior awareness of the NPS observed issue during the inspection, indicating that these inspections are either not being performed or are being performed inadequately by the concessioner.
	2.2	Inspection findings were addressed in a timely manner.	No	Issues that should be identified during regular facility inspections are going unaddressed for long periods, in many instances becoming repeat deficiencies extending over multiple years. During an August NPS inspection, it was noted by park staff that the Annie Creek Retail and Café building roof and siding had failed elements that had partially slid down the roof and were overhanging outdoor visitor areas, creating an overhead hazard. A large section of the fascia from above the front dormer had fallen to the ground from the roof. These are obvious issues that were not noted or addressed by the concessioner in a timely manner.
	2.3	Periodic evaluation facility findings were addressed in a timely manner.	No	Although some emergent periodic evaluation findings were resolved, most were not and have remained deficient over several rounds of periodic evaluation cycles, resulting in multiple repeat deficient findings on almost every periodic evaluation for every operation in 2023. Specific examples are discussed in 10-OPR Additional Notes/Comments where Periodic Evaluation findings are discussed.
		Facility maintenance was performed as scheduled in a timely manner.		
	3.1*	Preventative Maintenance	No	The Concessioner's maintenance plan and program does not demonstrate adequate preventative maintenance is being performed, which is observable in the condition of the concession facilities. The Concessioner hasn't submitted CMMS work orders to demonstrate preventative maintenance is planned and conducted. Periodic evaluations of facilities consistently revealed basic preventive maintenance such as filter replacement or ventilation hood wash chemical refilling were not being performed. Perhaps most concerning, is CLH's repeated failure to properly winterize CLH-assigned facilities. Domestic water was left on to the upper floors of the Crater Lake Lodge during the winter, which resulted in a water line freezing and subsequently breaking between rooms 314 and 315 on January 30th. This release of water made its way to the lobby and basement, shorting out the fire alarm system and rendering it inoperable for a time. It also impacted some of the Lodge's remaining historic elements such as the bark treatments on the logs and wood ceiling and floors. These preventable issues have happened repeatedly since CLH has held the contract. Another sprinkler pipe burst, flooding the Lodge kitchen on March 1, 2023, releasing an estimated 1,000 gallons and damaging the drywall and ceilings. The NPS is very concerned about future issues from water damage in inaccessible locations as a result of these repeated flood events.
	3.2*	Recurring Maintenance	No	The Concessioner's maintenance plan and program does not demonstrate adequate recurring maintenance is being performed, which is observable in the condition of the concession facilities. Multiple facility incidents over the past year have provided evidence that CLH is not completing recurring maintenance for example, almost all buildings within the concessioner's land assignment are in need of exterior painting. CLH does not sufficiently coordinate with the NPS on recurring maintenance needs related to commissioning and testing of seasonal potable water systems. During 2023 they did not follow procedures for the commissioning and testing of seasonal potable water systems and requests were made at the last-minute disrupting NPS staff workloads and requiring expedited test fees from the water labs. CLH staff were not sufficiently removing snow from their land assignment. Staff had to be routinely reminded to not plow snow into park roadways and did not adequately clear snow from roadways and walkways before opening facilities. Directional and information signage was missing for weeks in Mazama Village. Much of this was the result of signposts damaged during snow removal.
	3.3	Scheduled Repairs	No	The Concessioner's maintenance plan, program, and reporting does not demonstrate adequate scheduled repairs are planned or performed. CLH has provided no evidence that it has completed scheduled repairs to the NPS. One scheduled repair that was not completed was resetting the mooring buoy and chains where the CLH tour boats are moored in Cleetwood Cove. CLH began using the moorings despite knowing they were faulty and in July it was reported that one of the new tour boats had floated from Cleetwood Cove to the Wizard Island area.

3. Maintenance	3.4	Unscheduled Repairs	No	<p>CLH did not repair the Lodge roof eaves, Rim café roof, siding on Annie Creek Restaurant, and the rear siding of the Rim Dorm until the end of the season despite the damage occurring and noted during spring snow removal operations. The Concessioner's inaction left government assets exposed to the elements, open to pests, and in a generally unsightly condition of disrepair throughout the operating season. The NPS continued to communicate the need to address these issues and prioritized NPS NEPA and NHPA compliance completion to assist the Concessioner in addressing these projects promptly. Despite the NPS expediting the compliance and approval process to allow CLH to have time to complete these projects before winter, timely action was not taken before snow moved in in late November (as is typical) delaying repairs to the Rim Cafe roof and potentially exposing the building to further damage and water intrusion from winter conditions.</p> <p>As noted in the RMP, the emergency lighting system at the Rim Cafe failed in May resulting in public safety concerns. From a facilities standpoint, the unscheduled repair necessary on the battery backup building lighting system was poorly handled. No CLH staff were familiar with the operation of the system, so they were contacting the wrong vendors to repair it. At one point when pressed by the NPS to repair the issue, the regional manager got involved and confused the lighting system with the fire alarm system and presented a project proposal to the NPS for a fire alarm replacement. This dragged on for weeks and the system was never repaired or replaced. Because the emergency lighting system was an older, they hired an electrician to bypass it and to date, have presented no proposal to the NPS to remedy the failure.</p>
	3.5*	Component Renewal/Replacement	No	The Concessioner started 2023 with Repair and Maintenance Reserve balance and continued to accumulate RMR throughout the year. Despite the availability of funds and clear need for maintenance projects, the Concessioner did not submit plans or project statements for RMR projects to the NPS in 2023. For example, the Mazama Cabin Roofs were scheduled for replacement per CLH's 2023 Concessioner Project Plan and Report (CPPR) but no project request was submitted to the NPS. The condition of the roofs has deteriorated to the point that they are now in a deferred maintenance category. Additionally, the Concessioner started a component renewal project for water meter replacement in 2023 without submitting plans for prior review or approval from the NPS. The main water meters are not under CLH assignment and should not have been replaced by CLH.
	3.6*	Deferred Maintenance	No	The Concessioner's maintenance plan and program does not demonstrate adequate curing of deferred maintenance. CLH did not submit to the NPS any reports documenting the completion of deferred maintenance projects. The NPS did not observe deferred maintenance that was cured and facility periodic evaluations reveal increasing amounts of deferred maintenance on buildings from repeat deficiencies (see example above of Mazama Cabin Roofs. The NPS has observed 9 of the 10 cabins are in a severely degraded condition as a result of excessive deferred maintenance. The Rim Dormitory also has many deferred maintenance items to be addressed). The Lodge Employee Dining Room floor replacement was scheduled for completion in 2023 (per the concessioner's CPPR) but no project request was submitted to the NPS.
4. Reporting	Accurate and complete reports were submitted on time, in the correct format:			
	4.1	Annual Concessioner Maintenance Report	No	CLH did not submit an Annual Concessioner Maintenance Report.
	4.2	Concessioner Project Plan and Report	Yes	CLH submitted a CPPR to the NPS for the 2023 season; however, no projects on the plan were completed except for a personal property purchase (new tour boat delivery).
	4.3	Fixture Replacement Report	N/A	NPS has not required this report as LSI has been waived in the contract.
	4.4	Component Renewal Report	N/A	No approved CRR work was completed for 2023
4.5	Personal Property Report	No	CLH did not submit a personal property report for 2023.	
5. Computerized Maintenance Systems (CMMS)	5.1	CMMS is maintained and current.	No	CLH has not fully implemented a CMMS for this contract (required per Exhibit H, Part A, Section 4)(3). CLH started working on implementing Facility Fit in 2021, however, no work orders, reports or substantial use of the system to track maintenance or projects occurred in 2023. There are insufficient records documenting maintenance activities over the course of the contract, so the CMMS will never be current until a comprehensive condition assessment is undertaken.
	5.2	All maintenance actions and associated expenditures requested by the Service were provided in the correct electronic format.	No	NPS has not received closeout documents for any projects, including the Crater Lake Lodge roof replacement project as required in Section 4(f) of Exhibit F: Concessioner Project Procedures.
6. Other Contract Requirements	6.1	Contract-specific facility maintenance requirements, not otherwise addressed in the AMP standards, are met.	No	Exhibit F, Section 4(a), requires the designation of a Project Supervisor who has full responsibility for assuring that all construction complies with approved project documents and specified code compliance. The Service will direct its communication concerning the nature and progress of day-to-day project activity to this person. CLH completed two contracted building repair projects in 2023 (Lodge Roof Eaves, Annie Creek siding) and contracted an environmental restoration firm to clean up a sanitary sewer overflow. CLH did not inform the NPS of any designated project supervisor for these contractors, or adequately oversee the contractors, which resulted in incomplete work products (in the case of the sewage clean-up) and contractors taking unapproved actions (the roofing contractor stored an articulating boom lift in a public parking lot without permission for an extended period. CLH staff did not even know it belonged to their contractor or was for their project). CLH also failed to properly supervise their snow removal contractor who subsequently damaged the exterior of several buildings with their snow removal equipment and created a safety hazard by parking equipment in an active road corridor without permission or warning devices. The facility damage caused by the snow removal contractor was not addressed in a timely manner. Lack of contractor oversight has been a consistent issue that was noted in last year's AOR. The contract requires that: "Facility specific winterization procedures must be incorporated into building operation and maintenance plans. All facility drawings and operation and maintenance manuals must be reviewed annually to ensure accuracy (e.g., location of water shut-offs on drawings, plumbing drain-down procedures, etc.)." To date, CLH has failed to develop documented winterization procedures.

\* indicates a Special Attention Item



**ADDITIONAL NOTES / COMMENTS**

Failures in the CLH asset management program have been a persistent issue and focus area for the NPS throughout the contract. In 2021, CLH began setting up a program called 'Facility Fit' to satisfy the CMMS requirement in the contract; however, the program has never been fully set up nor implemented by the CLH maintenance staff. The lack of maintenance work tracking has caused several layers of issues including inconsistent and incomplete documentation of regular maintenance activities, incomplete project tracking for recurring and preventative maintenance, a lack of institutional knowledge for new maintenance staff, and a constant requirement for NPS staff to retrain and update staff on CLH projects and maintenance responsibilities. As noted above, the poor recordkeeping by CLH maintenance staff will hamper the ability to implement a CMMS as years of data about maintenance activities and facility conditions have been lost.

While the NPS received a CPPR from CLH for 2023, none of the projects targeted for completion in 2023 were completed. The project statements that are submitted by CLH are consistently incomplete. Information gaps range from incomplete specifications on materials used, lack of 'before' images of the project area, missing maps or drawings of project locations, insufficient project cost estimates, and an overall lack of project detail. Though the NPS requests information about proposed projects early in the year, a significant number of project statements were not submitted by CLH until October/November of 2023, leaving little to no time for the NPS to process the projects through the required review procedures. Three emergency projects were approved by the NPS in October and November 2023; however, only two were completed (the Lodge roof eaves repair and Annie Creek siding), and one was not started in time before winter conditions moved into the region and the project sites were no longer accessible (Rim Café Roof). CLH has not submitted closeout documentation for any project throughout the term of the contract.

CLH has consistently failed to provide adequate oversight of their snow removal contractor leading to annual damage of park resources, including roof damage on the Annie Creek Restaurant and the Lodge roof (CLH's contractor broke structural knee braces supporting the roof) and siding damage on several buildings around the park (Annie Creek, Shed in the Mazama employee RV campground, Rim Café siding, Lodge siding). Periodic evaluations of the CLH-managed facilities reveal repeated deficiencies, poor facility condition, and a generally reactive and ineffective approach to facility maintenance which is inadequate to maintain good condition of facilities. Paint is needed on almost every main building under CLH land assignment, including the Lodge, Rim Café, Camper Store, Rim Dorm, and Annie Creek. Dormer shakes were replaced as part of the Lodge roof replacement project completed in 2022, yet they remain unpainted and stand out significantly from the adjacent brown shakes that were not replaced.

Significant and ongoing turnover in the maintenance manager and maintenance worker positions contributes significantly to CLH's ineffective asset management program. Insufficient institutional knowledge, incomplete planning for continuity of operations, and general skills and abilities of maintenance personnel underlie the programmatic issues described in this 10-AMP evaluation. For example, maintenance staff did not know how to turn off water after a CLH employee caused a plumbing failure in Crater Lake Lodge, which led to damage to assets that could have been prevented. Staff struggle to successfully perform spring opening activities, particularly snow removal. During seasonal closing, improper winterization has resulted in burst pipes and subsequent water leaks that damage facilities. CLH is required to document winterization procedures in the maintenance plan as part of the contract (Exhibit H, Part B, Section 1A)(2)(m)). To date, they have not done so, which has created issues in ensuring proper shutdown procedures are known and followed, and ultimately resulted in building damage from inadequate winterization. The establishment of a successful maintenance program has been prevented by a lack of maintenance records or staff knowledge concerning prior repair history, project prioritization, industry standards, NPS requirements, and approval procedures. This has placed an additional burden on the NPS staff to train CLH staff in areas that are Aramark's responsibility and to conduct extensive oversight due to numerous and serious failures. For example, the NPS has now instituted a practice of conducting pre-opening inspections for every facility before allowing them to open due to the failure of the concessioner to address significant numbers of health and safety code violations before buildings can be occupied.

**Table 4: Scoring**

Scoring				
Program Area	Score (%)	Program Area	Score (%)	
1. Annual Concessioner Maintenance Plan (ACMP)	66.7%	5. Computerized Maintenance Systems (CMMS)	0.0%	
2. Inspections	0.0%	6. Other Contract Requirements	0.0%	
3. Maintenance	0.0%			
4. Reporting	33.3%			
<b>Total - All Program Areas</b>				
# In Compliance (Yes)	# Deficient (No)	# Deficient (Special Attention Items)	# N/A	# Applicable Reqs.
3	15	4	2	18
<b>Asset Management Score</b>	<b>16.7</b>	Superior = 90 – 100 Satisfactory = 70 – 89 Marginal = 50 – 69 Unsatisfactory = <49		
<b>Adjusted Asset Management Score</b>	<b>16.7</b>			
<b>Rating</b>	<b>Unsatisfactory</b>			
<b>Notes:</b> - If 1-2 Special Attention Items are not in compliance, the Asset Management Score is adjusted to Marginal and capped at 69. - If 3+ Special Attention Items are not in compliance, the Asset Management Score is adjusted to Unsatisfactory and capped at 49.				

**United States Department of the Interior - National Park Service**  
**Annual Overall Rating Report**  
*Contract Information*

**Instructions:** Fill in the corresponding contract information.  
 Note: To use Spell Check, hold "Ctrl + Shift + S" on your keyboard.

Year of Operation: **2023**

<b>Park:</b>	<b>Crater Lake National Park</b>	<b>Contract Term Effective Dates:</b>	<b>11/1/2018 through 10/31/2030</b>
<b>Concessioner Name:</b>	<b>Crater Lake Hospitality, LLC</b>	<b>Concessioner Doing Business As:</b>	
<b>Contract Number:</b>	<b>CRLA004-18</b>		
<b>Evaluator Name:</b>	<b>(b) (6), (b) (6)</b>	<b>Date of Review:</b>	<b>1/24/2024</b>

Please indicate below whether the following criteria areas apply to the concessioner being evaluated:

Program Area	Applicability (Yes/No)	
Environmental	Yes	<i>Applicable to all 1998 Law Contracts</i>
Public Health	Yes	<i>Applicable to contracts with one or more of the following services: food &amp; beverage, swimming pools, and thermal baths</i>
Asset Management	Yes	<i>Applicable to all Category I and II Contracts</i>

**Service Types**

**Instructions:** Add an X next to all applicable service category provided under this Contract. Scroll over service category for a list of all sub-categories.

<b>Air</b>		<b>Lodging</b>	<b>X</b>
<b>Automobile Services</b>	<b>X</b>	<b>Other</b>	<b>X</b>
<b>Boats</b>		<b>Recreation</b>	<b>X</b>
<b>Food and Beverage (F&amp;B)</b>	<b>X</b>	<b>Retail</b>	<b>X</b>
<b>Horse &amp; Mule</b>		<b>Transportation</b>	
<b>Land</b>	<b>X</b>	<b>Water</b>	<b>X</b>