

AMERICAN MOUNTAIN GUIDES ASSOCIATION

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September 30, 2016

Wilderness Planning Staff
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

RE: AMGA Scoping Comments for Yosemite National Park Wilderness Stewardship Plan

To the Yosemite Wilderness Planning Staff:

The American Mountain Guides Association would like to thank you for the opportunity to provide public scoping comments on the Yosemite National Park Wilderness Stewardship Plan (“the Plan”). This letter expands upon AMGA’s comments submitted during the initial comment period in January. The January comments, which are attached, provide an overview of the AMGA and our overall position on guiding in Yosemite National Park’s Wilderness. This letter summarizes many of our fundamental positions and further explores our positions on: 1) the structure of possible Commercial Use Authorizations for climbing guiding, and 2) the mitigation of social impacts associated with both guided and non-guided climbing visitors.

About the AMGA

The American Mountain Guides Association (AMGA) is a national 501(c)(3) non-profit organization that has been supporting mountain professionals for over 30 years. The AMGA inspires an exceptional client experience by being the premier source for training, credentials, resource stewardship and services for professional mountain guides and climbing instructors in the United States. The AMGA is an educational institution, an accrediting body, and a standard setting organization. The AMGA is our nation’s sole representative to the International Federation of Mountain Guides Associations (IFMGA). The IFMGA is comprised of 25 member-countries and is the international governing body responsible for global guiding standards.

Rationale for Guiding in Wilderness

We support professionally trained commercial guiding services as a Necessary and Appropriate tool for the realization of public purposes of Wilderness, and believe that professional guides are assets to our public lands, providing interpretation, education, and conservation opportunities to their guests. Not only do we believe that mountain guiding does not detract from Wilderness character, we believe it enhances it through the educational opportunities we have with visitors in the mountains. AMGA firmly believes that climbing is not at capacity in Yosemite.

Beyond enhancing the visitor’s Wilderness experience, the AMGA believes there is strong demand for new options in climbing guiding that are not being met by the sole current guiding

concessionaire. Increased options for climbing guiding will permit a more diverse audience to enjoy Yosemite's world class climbing experiences. This includes many less experienced climbers and residents of urban areas, many of whom do not have the opportunity to develop the necessary skills to tackle Yosemite's challenging climbs independently. The limited guiding opportunities currently available in Yosemite narrow the scope of visitors who are able to engage in climbing, a defining activity in this Park.

Professional Mountain Guides are Stewards of the Resource

Trained and certified professional guides are stewards and benefit the Wilderness resource. Utilizing Leave No Trace principals and teaching them to their guests minimizes environmental impacts. Proper planning and climbing route selection is done to minimize social impacts on the self-guided public while providing valuable experiences and education for guided visitors. For example, if Route A is known to be busy with self-guided climbers during the weekend, a guide would steer his or her guests to Route B to distribute use into other areas and minimize potential conflicts with other visitors. Guides provide mentorship to their guests on Wilderness topics ranging from "why is there Wilderness?" to enabling legislation, to ways their guests can support the invaluable Wilderness resource. Lastly, guides and their guests can support park staff with conservation initiatives, such as trail work and cleanup days.

CUAs for Rock Climbing, Guide Education, and Alpine/Ski Guiding

AMGA believes a Commercial Use Authorization ("CUA") program is the best avenue for the park to pursue a sustainable increase in access for guided climbing. We believe that a program that permits access by exceptionally well qualified individual guides, regardless of their affiliation or non-affiliation with any guide service, will best serve the interests of visitors. These CUA's should be issued for a period of time adequate to make it economically feasible for guides and their clients to visit Yosemite. Such a time period would not be less than one-week in Yosemite Valley, with a longer time period being more economically feasible for visiting guides. The opportunity for a similar amount of CUA time in Tuolumne would make this program more economically viable for guides.

The application process for any CUA should be based on standard criteria including appropriate training and certification. AMGA believes that climbing in Yosemite both an exceptional climbing resource unmatched in the National Park system and technically demanding to guide well. Because of the unique nature of this climbing resource, we believe that AMGA Rock Guide Certification is the appropriate standard for qualifying guides. This is the only U.S. certification program that examines guides up to a 5.10+ A2 Grade V standard. This program also is the only American guide training program recognized by the International Federation of Mountain Guides Associations (IFMGA). IFMGA certified guides, having been trained and examined in rock, alpine, and ski guiding would also meet the standard advocated by the AMGA.

CUA's issued at least nine or twelve months in advance of any use would be ideal for guides and visitors, as would CUA's that were issued for multi-year periods. CUA dates with some flexibility or exchangeability with other guides are optimal. This is both for planning purposes and so that guides are not locked into dates that may affect risk to their clients. Specific narrow windows of guiding may encourage activities during sub-optimal times such as during periods of unstable weather.

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Flexibility in the CUA process will be valuable to both guides and visitors. One example would be allowing guides to make use of any available CUA capacity without imposing limits on the days utilized by individual guides. Under this approach a guide might be allocated a set period of time (a week, for example) under a CUA. This same guide would also be able to utilize additional CUA time that was not allocated during the initial CUA award process. Such a step could encourage guides and the visitors the work with to utilize the “surplus” capacity of the climbing resource during off-peak times.

Guide Education: The AMGA, in the interest of best preparing American guides to work in Yosemite and other rock climbing venues around the world, would greatly value access to Yosemite for our own guide education programs. This would enhance the AMGA’s training programs, primarily those at an advanced level that emphasize longer climbing routes. Similar to the other rock climbing use that AMGA is advocating for, the AMGA advanced courses are conducted at a low ratio (one instructor to two participants). Access to 500 or more annual user days in Yosemite National Park would have a tremendous value for the AMGA in furthering American guide education, though as little as 300 days would still be viable.

Alpine and Backcountry Ski Guiding: While the focus and priority of these comments is on rock climbing in Yosemite Valley and Tuolumne, there are also extensive alpine climbing and backcountry skiing (or ski mountaineering) resources in the Park. There is currently no guiding specifically authorized for these resources. There are visitors who are interested in accessing these resources with the assistance of a guide. The AMGA would encourage Yosemite to consider providing some limited CUA opportunities for alpine climbing and backcountry skiing activities in the Wilderness. Given the lower usage of these resources in comparison to frontcountry rock climbing, there are likely to be more limited social and environmental impacts associated with this guiding.

Social Impacts of Expanded Guiding

The AMGA is aware of the popularity of certain climbing routes in Yosemite National Park. We respectfully ask that the Park consider guides and the AMGA as potential partners in helping to manage this use. We believe that dialogue between guides and the Park can resolve any social impact issues and the AMGA is willing to provide resources to support this process.

Low ratio guiding (one guide with one or two clients) is the best way to encourage fluid movement of guided parties on busier routes. On routes where crowding is a concern, the AMGA would like to assist guides in establishing a system for scheduling access to specific routes. Such as scheduling system would ensure that use was spread appropriately around climbing resources.

If limits on guided access to specific climbing routes must be imposed to address social impacts, a blanket closure of routes should be avoided. While Yosemite holds a diversity of climbing resources, closure of certain routes would have a negative impact on visitors by severely limiting opportunities for beginner and intermediate level climbers.

We ask that, before any specific climbing resource is closed to guiding, other strategies are considered. These strategies might include seasonal or weekend versus weekday restrictions and could be workable solutions for the park, guides and the public.

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Conclusion

The AMGA would like to thank the staff of Yosemite National Park for your dedication to our public lands, and for conducting this inclusive planning process. We appreciate your consideration of these comments. It is the sincere wish of the AMGA to be considered a resource and supporter of Yosemite National Park. Please contact us if we can be of any assistance in the development of your draft Wilderness Stewardship Plan.

Sincerely,



Alex Kosseff
Executive Director



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