

AMERICAN MOUNTAIN GUIDES ASSOCIATION

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March 21st, 2016

Planning Team
Black Canyon of the Gunnison NP/Curecanti NRA
102 Elk Creek
Gunnison, CO 81230

E-mail: cure_info@nps.gov

RE: AMGA Comments for Black Canyon of the Gunnison National Park Wilderness and Backcountry Management Plan Preliminary Alternatives

Dear Wilderness Planning Team:

The American Mountain Guides Association (AMGA) would like to thank you for the opportunity to provide public comments on the Black Canyon of the Gunnison National Park/Curecanti NRA (BLCA/CURE) Wilderness and Backcountry Management Plan (WMP, or the Plan). We are excited to be a partner and resource in the planning process, and look forward to supporting both the mountain guiding profession and Black Canyon National Park. The AMGA believes strongly in the value of Wilderness— an enduring resource that has shaped both the ethic and history of American mountain guiding.

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 that is our nation's sole representative to the twenty-five member-countries International Federation of Mountain Guides Associations (IFMGA), the international governing body responsible for guiding standards around the world.

Since its genesis in 1979, the AMGA has grown to represent over 3,000 members that are represented in 49 states and 13 countries, over 30 Accredited Guide Services and educational institutions, and 60 Corporate Partners. Each year the training provided by the AMGA reaches over 700,000 people through direct contact between certified guides, climbing instructors, accredited programs, and their clients.

The AMGA provides education, training and certification in the disciplines of alpine climbing, rock climbing, and ski mountaineering. It also raises the standards of guide services and climbing schools with regard to safety, Leave No Trace practices, client care, education, and wilderness stewardship. The AMGA adheres to the strictest of standards that are rigidly enforced to ensure our certified guides, climbing instructors, and accredited programs are the nation's preeminent experts on climbing and ski mountaineering best practices.

The AMGA has been a Commercial Use Authorization (CUA) holder at BLCA since 2006, and occasionally uses the incredible wilderness climbing terrain of the Inner Canyon for our Rock Guide advanced training and assessments.

Comments

The AMGA is excited to support the Park's Preferred Alternative, and we welcome the recognition of the role that professionally trained commercial climbing guides play in supporting the Park and the wilderness resource itself. This is a welcome change from the unjustified moratorium on guiding proposed by the 2011 Plan alternatives, and we thank Park staff for their deliberation and consideration of the comments provided during that period.

We strongly support the stated goals of the Plan, and believe that adaptive management strategies best serve the public and the resource. "Enhancing public understanding of the relevance of Wilderness and backcountry values and opportunities...." – this is what guides do, and in this we see commercial service providers as being an extension of the Park, educating the public and providing mentorship to visitors on these topics. These range from CUA holders such as the AMGA itself, who occasionally uses the unique terrain of the Inner Canyon for assessments for professionally trained Rock Guides, to more traditional guide services introducing their experienced guests to the "rugged, vertical landscapes offering unparalleled opportunities for self-reliance and challenge." With that phrase, we could not agree more. Everyone that climbs in the Black Canyon, be they non-guided or guided, experiences opportunities for self-reliance and challenge. The wilderness does not differentiate and guided use is public use.

As guides and educators, we strongly support continued efforts towards public education and interpretation, and are happy to partner with park staff to develop educational points that could serve the guided public in a meaningful way.

We support the adoption of the BLCA Interim Climbing Management Plan as part of the Plan. Climbing management in the Park has been a model for managing wilderness climbing resources, and we are happy to see it formally recognized. The Black Canyon is a true bastion of traditional adventure climbing in a wilderness setting, and the climbing ethic reflects that. We greatly appreciate the Park's acknowledgement of the role that *de minimus* fixed anchors (that require rock alteration) play in traditional climbing, and the reasonable policies managing them. However, the Preferred Alternative states that it will adopt the ICMP "with modifications", but does not state what modifications. We believe the current policies outlined in the Interim Plan are reasonable and prudent, and would like to see the modifications continue with the spirit of the current policies, particularly with regards to fixed anchors (that require rock alteration). In addition, we believe that strong consideration be given to programmatic authorization for placing fixed anchors (that require rock alteration), both to preserve the opportunity for unconfined recreation, as well as not create an additional administrative burden for park staff.

The AMGA supports the proposed policies for CURE, specifically the EPMP Zone and Blue Mesa Backcountry Zone, and believe that integrating those areas into the climbing management plan will

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benefit both climbers and the resource. In addition, we appreciate the acknowledgement that consideration would be given to new commercial service providers that meet the Necessary and Appropriate criteria.

One point that is not clear in the Alternative is with regards to the Subzone boundaries is where the proposed boundary between Primitive and Pristine lies in relation to the Painted Wall. The provided map is lacking in detail as to that point. As most of the established climbing routes lie upstream of the Painted Wall, it makes sense that boundary would lie downstream, but additional clarification should be provided. In addition, the alternative refers to “indicators, measures, and standards” for “visitor experience and resource conditions”, but does not provide any further explanation. Presumably, these would be developed further during the planning process. However, if they are currently available, we ask that they be made public to assist in more informed commenting.

The Preferred Alternative calls for thoughtful marking of the Wilderness boundary at common access points, something the AMGA firmly supports. We believe the acknowledgement of a change in land designation is an excellent interpretive opportunity for all visitors, and provides a specific teachable moment for guides and their guests. Depending on the extent of this project, the AMGA would be happy to provide volunteers to assist park staff in the placement of boundary markers.

Beyond the comments here, the AMGA supports the comments dated March 21st, 2016 submitted jointly by the Access Fund and the Gunnison Valley Climbers. In particular, the Access Fund and Gunnison Valley Climbers’ comments provide detailed references with regard to NPS units that have established effective management approaches with regard to fixed anchors.

Conclusion

The AMGA thanks Black Canyon staff for the opportunity to provide comments on these proposed alternatives. We look forward to serving as a resource to the park during the planning process and in years to come. Please do not hesitate to contact us with any further questions.

Sincerely,



Alex Kosseff
Executive Director

cc: Erik Murdock, Access Fund
Maria Millard, American Alpine Club
Peter Horgan, Gunnison Valley Climbers

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