

## **American Mountain Guides Association**

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March 2, 2017

Joshua Tree National Park  
Attn. David Smith, Superintendent  
74485 National Park Dr.  
Twentynine Palms, CA 92277

Dear Superintendent Smith,

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 27 member-countries and is the international governing body responsible for guiding standards.

We are writing regarding the recently revised standards for rock climbing Commercial Use Authorizations (CUAs) in Joshua Tree National Park. The AMGA would like to clarify our role in the development of these CUA standards and our position on the standards. The AMGA did not seek to alter the existing CUA standards. We did provide assistance to Li Li McGarrity on the JOTR staff after she approached the AMGA regarding standards for guides who train and certify other climbing guides.

Ms. McGarrity reported to the AMGA that her questions around professional standards for climbing guides and instructors arose when she was reviewing the files of guides working for the Professional Climbing Guides Institute (PCGI). Her concern was that the guides in question had provided PCGI certification to each other without review by any third party. Ms. McGarrity had questions regarding the qualifications of individuals training and certifying other climbing guides and instructors in JOTR. It was at this point that Ms. McGarrity contacted the AMGA with her question.

The opinion expressed by the AMGA is that individuals training and certifying other guides should be held to a higher, objective standard that has been established by a third-party peer review. The AMGA went through this process in the 1990's in order to be accepted into the International Federation of Mountain Guide Associations (IFMGA) and again in 2008 in order to have our single pitch and climbing wall instructor programs endorsed by the International Climbing and Mountaineering Federation (UIAA).

The information AMGA offered to Ms. McGarrity was not provided with the intent to question the operations of any other training and certifying body. Our intent was to provide JOTR with information on the third-party standards on which the AMGA has based the qualifications of individuals training and certifying climbing guides.

AMGA has invested significantly in developing training that meets or exceeds international climbing guiding and instruction standards. It required 18 years for the AMGA to achieve recognition from the IFMGA. Our organization learned a tremendous amount from this process, achieving UIAA endorsement for our climbing instructor programs, and from our international colleagues with whom we meet at least twice annually. We firmly believe that these international standards for our certified instructors and guides result in better visitor experiences and improved safety.

While we believe strongly in our internationally reviewed training standards, at the same time we are not encouraging JOTR to exclude other guides, instructors, or certifying bodies. We do, however, support JOTR in retaining the “or equivalent” expectation as written into the current CUA standard. This reasonable requirement means organizations providing certification and instruction to climbing instructors or guides must demonstrate that the training and certification they provide meets broadly recognized quality standards.

To reiterate, it is neither the place nor the intent of the AMGA to undermine guides or climbing instructors permitted to operate in JOTR. We were asked to comment on a specific area of concern around certifying organizations and we shared information on the standards under which AMGA operates. We appreciated the opportunity to work with JOTR and are available as a resource should other questions arise regarding public safety, guide education, and protecting natural resources. Feel free to contact us with any additional questions that you may have.

Sincerely,

A handwritten signature in black ink that reads "Alex" followed by a stylized, cursive surname.

Alex Kosseff  
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