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October 14, 2019

Jim Lebel
Commercial Services Team Lead
Denali National Park and Preserve
PO Box 9
Denali Park, AK 99755-0009

RE: Guide Experience Requirements on Denali

Dear Mr. Lebel,

The American Mountain Guides Association and the undersigned mountaineering concession contract holders respectfully submit this letter regarding the guide experience requirements described in section 4(D)(1)(b-c) of the Denali National Park and Preserve Mountaineering Concession Contract (the Contract).

The American Mountain Guides Association (AMGA) is a 501(c)(3) educational non-profit organization that provides training and certification for climbing instructors, mountain guides, and ski guides throughout the United States. Founded in 1979, the AMGA has trained over 13,000 climbing and skiing guides who provide outdoor experiences for the general public that emphasize safety, stewardship, and education. As the American representative to the International Federation of Mountain Guide Associations (IFMGA), the AMGA institutes international standards for the mountain guiding profession in the United States and serves as an educational body for land management agencies, guide services, outdoor clubs, and others wishing to establish internationally-recognized standards for guided climbing and skiing activities.

The mountaineering concession contract holders included herein are authorized to provide mountaineering guide services in Denali National Park and Preserve (DENA). Collectively, we estimate our operations train, supervise, and employ many of the guides in the American mountain guiding industry. We are also the primary providers of guide training and supervision that is specific to the unique climbing conditions at DENA.

It is our goal to support the purposes for which DENA was established and actively partner with the National Park Service to ensure reasonable access exists for the public to experience mountain climbing and mountaineering, as stated in Section 202(3)(a) of ANILCA:

The park additions and preserve shall be managed for the following purposes, among others: To protect and interpret the entire mountain massif, and additional scenic mountain peaks and formations; and to protect habitat for populations of fish and wildlife including, but not limited to, brown/grizzly bears, moose, caribou, Dall sheep, wolves, swans and other waterfowl; and to

provide continued opportunities, including reasonable access, for mountain climbing, mountaineering and other wilderness recreational activities.¹

To this end, we wish to express our concerns with the new guide experience requirements for mountaineering concession contract holders in DENA and offer a solution that will benefit the public and support the purposes of Denali National Park and Preserve.

Historical Mountain Guiding Traditions

Guided mountaineering has a long and colorful tradition in DENA. For nearly 60 years, guided parties have been climbing peaks and routes throughout the park. This has included ascents of popular routes on Denali like the West Buttress as well as more remote, less frequented routes such as the Muldrow Glacier, the Northwest Buttress, the Cassin Ridge, and routes on a multitude of other peaks in the Park. Additionally, guided parties have established numerous first ascents across the Alaska Range. Guides and their clients established first ascents on peaks such as Mount Johnson, Mount Wake, Mount Grosvenor, and Mount Frances from the ground up and in fine style.

Throughout this long history, it has been commonplace for guides to guide ascents of routes that they have not previously climbed. This tradition is exemplified by the first ascents mentioned above but it is also reflected in the history of guiding on the West Buttress, the West Rib, and other routes. On numerous occasions prior to the 2019 season, our companies have staffed Denali expeditions with guides who may not have climbed a route previously. We have had great success with this approach by basing our staffing decisions on numerous factors that characterize a guide's ability to provide a safe and successful experience for the public. This may include, but is not limited to, a guide's previous experience on Denali and elsewhere, formal guide training, demonstration of judgment, track record of safety, and personal characteristics. Taking all of these considerations into account has enabled us to most effectively staff our trips and ensure the public will receive the highest quality service.

While we acknowledge previous experience on the route to be guided is advantageous, in our experience it is not a predictor of future success nor is it a necessary prerequisite for staffing decisions. Changing conditions can quickly alter the character of route, making a previous ascent a poor substitute for true qualification. Additionally, clients' abilities and goals necessitate dynamic decision making from a guide that goes far beyond a previous ascent of a route. Under such circumstances, we have found it is most important for a guide to be well rounded, trained to an industry standard, and experienced in a variety of conditions.

We believe our history of safety and quality service speaks for itself in demonstrating this point. Prior to the 2019 guide experience requirements, our companies have maintained an exceptional track record of safety and positive public rapport in DENA. We have routinely received high marks for being safety oriented, courteous, and stewards of the park.

¹ PUBLIC LAW 96-487—Section 202(3)(a).

Concerns with the Guide Experience Requirements

The guide experience requirements put forth in the current Contract are as follows:

D) Field Operations and Safety

(1) Staffing.

- a. Each group will have a Lead Guide who will oversee the climb from ranger station check-in to check-out.*
- b. Lead Guides must have previously climbed the entirety of the route.*
- c. Guides can lead only sections of the route that they have previously climbed. The Lead Guide must lead on those sections of the route that the Guide has not previously climbed.*

We understand the desire to take all available precautions when engaging in activities that have inherent risks, such as mountaineering. We also understand the desire to ensure guides are suitably skilled and experienced for the challenges they will face when guiding clients in DENA. However, we believe our longstanding historical hiring practices have met the needs of the public and NPS, and the new, additional guide experience requirements have only resulted in unintended negative consequences.

For example, during the 2019 season, there were cases in which our companies were asked to guide an objective that was well within our professional capability but which we were unable to accommodate because the guide had not climbed the route. The South District Ranger has been understanding and has allowed for some exceptions to be made to the requirement. However, the exemption process was cumbersome, troublesome for us to explain to the public, and difficult for the public to understand. We also question whether or not DENA should be involved in assessing a guide's qualification to guide a particular route. Does DENA really want to be responsible for reviewing resumes and determining whether or not a guide is qualified for a particular objective? The new requirements and the process for seeking exemption have also caused our entire staffing process to become significantly more complicated, time-consuming, and costly.

We foresee these challenges getting worse in the future if the new guide experience requirements remain in place. Most notably, the availability of guided climbs of seldom-done routes will substantially decrease, limiting options for the public. At the same time, density will increase on already busy routes such as the West Buttress and West Rib. These would be poor outcomes for guided climbing in DENA.

It has been suggested that guides can obtain the requisite experience to lead less frequented routes by taking personal trips to them in advance of guiding a route. For a professional guide, working a season as short as the DENA climbing season, it is not feasible to take up to a month off from work to do a personal climb. Furthermore, if a concessioner were to organize a climb for staff on Denali, it would cut into the very limited number of permits afforded by the concession contract.

Request to Reinstate Guide Experience Requirement from Previous Contract

Our companies have a long history of acceptable performance as contract holders in DENA. The systems we have employed prior to the implementation of the guide experience requirements have been demonstrated to be efficacious and we have seen no evidence to suggest the new requirements are necessary. Moreover, the new requirements have been onerous to implement, they have prevented the public from accessing DENA with a guide, and, over time, they will have negative effects on the patterns of use in DENA. Based on these concerns, we respectfully request the new guide experience requirements be removed from the Contract and be replaced with a guide experience requirement similar to that used in the previous contract. We recommend language such as:

On every Denali expedition, the Concessioner will have at least one guide that has guided on Denali previously.

A guide experience requirement such as this will avoid the unintended consequences described throughout this letter while still ensuring a reasonable experience requirement exists for every guided expedition on Denali.

Conclusion

We greatly value our relationship with the National Park Service and we appreciate the opportunity to serve the public in DENA. We share our perspective on the new guide experience requirements to promote open dialogue with NPS and work collaboratively toward policies that will support reasonable access for mountaineering in Denali National Park and Preserve. Please let us know if there is an opportunity to discuss this matter further.

Sincerely,

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American Mountain Guides Association

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Alpine Ascents International

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IMG Denali

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