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June 11, 2021

Joshua Tree National Park 74485 National Park Drive Twentynine Palms, CA

## RE: American Mountain Guides Association Comments on Joshua Tree National Park Climbing Management Plan

Dear Park Planners,

The American Mountain Guides Association respectfully submits these comments regarding the Joshua Tree National Park (JOTR) climbing management plan process.

The American Mountain Guides Association 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 AMGA holds a <u>General Agreement</u> with the National Park Service to "support the conservation, stewardship and protection of national parks, and encourage recreational use of the parks that are consistent with those practices." Moreover, AMGA has a long history of providing professional guide training courses for active and aspiring rock climbing guides in Joshua Tree National Park.

## **Commercial Recreation Benefits**

Commercial recreation opportunities such as guided rock climbing provide substantial benefits for national parks, the public, and local communities. In an increasingly urban society, guides connect people to the outdoors and foster an appreciation for national parks. They provide valuable interpretation of natural and cultural resources, they promote an ethic of conservation and stewardship, and they help to foster the next generation of national park advocates. Guides also support local communities by contributing to the vibrant and growing outdoor recreation economy. To ensure guiding services in the park continue to provide these benefits, we offer the following comments on the JOTR Climbing Management Plan.

## **Guided Rock Climbing in Joshua Tree National Park**

While the topic questions for this initiative on the <u>PEPC website</u> do not address issues related to commercial use authorizations and guided rock climbing in park, the JOTR newsletter regarding this planning initiative states that an objective of this plan is to "clarify roles and expectations of professional guides and special use permit holders, including a necessity for their operation in wilderness." The AMGA looks forward to working with the park to help clarify the roles and expectations of climbing guides in JOTR both in and outside of designated wilderness.

The newsletter also states, "[t]he park is not considering limiting the number of people allowed to engage in rock-based recreation." We are pleased to see this direction as the number of visitors who choose to experience rock climbing in Joshua Tree with a guide represent a small fraction of overall visitor use and we believe limiting their opportunities would have little effect on the overall management goals of the park. Furthermore, guided groups are led by professionals who are trained in "Leave No Trace" and they provide interpretation of park resources for visitors. These attributes of guides promote responsible use and contribute to good stewardship of Joshua Tree National Park for all visitors. For these reasons, we strongly support the direction in the newsletter to allow continued rock-based recreation at current levels. We also look forward to working with JOTR to find ways the guided climbing community can support the stated management objectives related to fixed anchors, access trails, and protecting cultural resources.

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The AMGA greatly values our relationship with the National Park Service and we appreciate the opportunity to serve the public in JOTR. We share our perspective to promote open dialogue with NPS and work collaboratively toward policies that will support continued access for the public who chooses to climb with a guide in Joshua Tree National Park. Please let us know if you have questions.

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Sincerely,

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Matt Wade Deputy Director American Mountain Guides Association