

**Climbing in Color**  
climbingincolor.org  
[hello@climbingincolor.org](mailto:hello@climbingincolor.org)  
PO Box 41117  
Tucson, AZ 85717



January 29, 2024

The Honorable Thomas J. Vilsack  
U.S. Department of Agriculture Secretary  
1400 Independence Ave., S.W.  
Washington, DC 20250

The Honorable Randy Moore  
U.S. Forest Service Chief  
1400 Independence Ave., S.W.  
Washington, DC 20250

Re: FSM 2355 Climbing Opportunities #ORMS-352

Dear Secretary Vilsack and Chief Moore:

Climbing in Color (CIC) is a 501(c)(3) nonprofit rock climbing group based in Tucson, Arizona. The state of Arizona occupies the land of 22 sovereign nations whose ancestors have lived on this land for time immemorial. Tucson is home to the O’odham and the Yaqui.

CIC was founded in 2019, and its mission is to “elevate the voices of climbers of color and build a community of camaraderie and support.” With the help of our wonderful community, CIC hosts gym meetups, outdoor climbing events, and social gatherings. In addition, CIC subsidizes gym passes and provides scholarship opportunities for climbing classes and clinics to Black, Indigenous, and People of Color (BIPOC) climbers.

For many members of the BIPOC community, climbing provides an opportunity to connect to outdoor spaces in a way that is markedly different from any other recreational activity. It’s not just about the physical connection or exertion. Many of us find a spiritual connection, healing spaces, and inspiration when we climb in these spaces. At the same time, we find community.

Climbing in Turtle Island’s forests and parks is a great privilege. CIC recognizes there exists various classifications of federal land management systems on indigenous lands. Federal laws and regulations concerning outdoor climbing areas present complex, multi-layered issues not only because outdoor climbing spaces exist on stolen indigenous land, but also because they impact the BIPOC community’s access to these spaces.

Today, CIC writes regarding the USDA Forest Service’s proposed directive “FSM 2355 Climbing Opportunities #ORMS-352,” which would add a new section (2355 – Climbing Opportunities) to Forest Service Manual (FSM) 2300, Chapter 2350. This proposed directive would impact climbing areas in both designated wilderness areas and outside wilderness areas. Specifically, the directive classifies fixed anchors—the bolts, pitons, and slings that technical climbers have used to safely ascend and descend technical faces since well before Congress

**Climbing in Color**

climbingincolor.org

[hello@climbingincolor.org](mailto:hello@climbingincolor.org)

PO Box 41117

Tucson, AZ 85717

passed the Wilderness Act—as prohibited “installations” in Wilderness areas. If approved, the directive would apply to new and existing anchors.

CIC opposes the draft directive to the extent that the directive impacts existing fixed anchors that do not negatively impact indigenous lands. Fixed anchors are critical to safely climbing outdoors. On the other hand, CIC does not endorse unconditional use of fixed anchors, especially in designated Wilderness. A balance must be struck between the two. However, the proposed directive is difficult to understand as written and, given how many climbing areas exist across the United States, it is hard to grasp the real impact of the directive on all the diverse climbing areas. This being said, CIC strongly supports the Tribal Consultation process and hopes that as many indigenous voices are heard during this process. To the extent that indigenous voices seek to be heard and permit the USDA Forest Service to share, CIC hopes that USDA Forest Service will share those positions to better inform the public’s opinion on the proposed directive.

CIC strongly recommends that the USDA Forest Service significantly extend the public commenting period by at least 90 additional days. And, during this time, CIC requests that the USDA Forest Service presents to the public its proposed directive along with Q&A opportunities. In addition, CIC encourages climbers to provide their input specific to their climbing communities, especially BIPOC climbers.

Thank you for the opportunity to listen to our perspective.

Sincerely,

Climbing in Color