Process and Authority for Taking Federal Positions
Associated with Our Wild America (Wild) Campaign Issues
Process Developed by the Grassroots Network / Our Wild America Consolidation
Task Force pursuant to Sierra Club Board resolution

Executive Summary of the Process

Wild Senior Director and Volunteer Co-Leads or their designees will:
- Monitor the Wild Campaign e-mail account for requests for action
- Assign an urgency level to each Wild Campaign-related federal decision request.

The Lands Team Director then operates the process that ultimately defines a recommendation to the Vice President of Conservation and National Program Director (or designee). The major steps are:
- Identify appropriate entities that are directly involved with the decision
- Assemble an information package about the recommendation to be reached
- Coordinate with the identified entities, encourage them to recommend a position
- Work to reach a consensus position
- If no entity consensus is reached, pass the incomplete recommendation to Wild Senior Director and Volunteer Co-Leads.
- When a consensus is not reached, Wild Senior Director and Volunteer Co-Leads develop the recommendation

The Vice President of Conservation and National Program Director (or designee) make the decision based upon the package of information from Wild.

Lands Team Director informs the Sierra Club entities and individuals of the decision.

Detailed Federal Decision Making Process

Current Sierra Club policy “Jurisdiction within the Sierra Club” addresses which Club entities have authority regarding the taking of positions on legislation, regulations, and other matters. The policy states: Positions on national legislation may be taken only by the Vice President of Conservation and the National Program Director. Either may delegate decision making to another person or entity. This same decision making pair also has authority to take positions on federal regulations, administrative actions (designations, Executive Orders, miscellaneous Washington Office direction to agencies, or Presidential proclamations and the like), and other matters of national significance.

The scope of this process definition is intended to apply to issues associated with the Club’s Wild Campaigns that deal with land, water, and wildlife work. If a Wild issue covered by this process overlaps with non-Wild Campaigns, such as Beyond Coal or Beyond Oil, then the Wild Senior Director will initiate coordination to reach a Club-wide recommendation per this process. This process is intended to apply to ‘new decisions or bills’ and not be applied retroactively to past decisions. This process will not apply
to bills that are reintroduced from previous Congressional sessions and are considered to be ‘the same’ or ‘substantially the same’ as the original bill where a decision was taken.

Because the current policy does not describe the specific process leading up to taking a Club position, this memo is intended to clarify and structure the process for making recommendations to the Vice President of Conservation and the National Program Director. When a chapter, group, Wild entity and/or Grassroots Network entity desires the Sierra Club to take a formal position on any federal matter related to land, water or wildlife protection the following process is to be utilized.

A. When dealing with decisions that are complex and/or require significant coordination and strategic assessment prior to reaching a decision, the following steps are to be followed:

   NOTE: Often determining what position the Sierra Club will take on a federal action requires significant study and coordination. While this work may result in a recommendation of either opposition or support, that outcome may not be apparent at the beginning of a process. Sometimes arriving at a position of support takes more effort than arriving at a position of opposition.

   EXAMPLES: Proposed actions that would require study could be legislation that would create exceptions to, exemptions from, or claims to make clarifications of existing statutes or “Organic Acts.” Other proposed federal actions could trigger reviews of Sierra Club policy conformance such as the Land Exchange policy. Other actions that involve multiple management designations and/or alter agency jurisdictions might need further study.

   1) The requesting entity must send a request for action, 4-6 calendar weeks prior to when a final decision is needed, to wild.position.request@sierraclub.org. The request must:

   2) Include relevant legislative or regulatory language, any useful reference material explaining the issue and any relevant Sierra Club policies.

   3) Identify the primary contact person from the entity making the request.

   4) Describe the desired outcome of the Club action.

   5) Include a list of all those who the requesting entity has coordinated with, both externally and internally.

   6) Clearly state the deadline for when a decision is needed.

B. When dealing with decisions that can be made 'by inspection' because our position is obvious, the following steps are to be followed:

   NOTE: Often federal decisions are potentially so bad that only a limited review will determine that we will be in opposition. In those cases it is important that we limit the effort, but document our position. If a decision appears favorable, it is important to ensure that sufficient coordination take place.

   EXAMPLE: HR 3188 (2014), the Yosemite Rim Fire Emergency Salvage Act.
1) Send a request for action, at least **1-2 calendar weeks** prior to when a final decision is needed, to wild.position.request@sierraclub.org

2) Attach any relevant information to the request.

3) Identify the primary contact person, with contact information, from the entity making the request.

4) Describe the desired outcome of the Club action.

5) List who the requesting entity has coordinated with prior to making the request.

C. When dealing with decisions that are required almost immediately, the following steps are to be followed:

Call or email the Lands Team Director for the Wild Campaign, at athan.manuel@sierraclub.org or 202-716-0006 and explain the issue, what needs to be done and when a decision is needed. The Lands Team Director, or his designee will set up a phone call with the involved entities within one day of receiving the request.

D. Multiple Wild entities develop a recommendation.

Typically multiple entities will be involved in reaching a recommendation when developing a position on federal matters. In order to ensure that recommendations are submitted to the Vice President of Conservation and the National Program Director in a coordinated and timely fashion, the following coordination and development process will be used:

The Lands Team Director will:

1. **Define** the entities **directly** associated with the decision including chapters, Wild entities, and Grassroots Network Teams as appropriate.

2. **Assemble** the requested materials as defined in Paragraphs A or B or C and distribute the materials to the entities defined in item 1 above. Utilize any assistance needed to complete this task.

3. **Distribute** supporting materials to each of the involved entities.

4. **Coordinate** the recommendation of a position from each entity.

5. **Strive** for a consensus position. When all entities are in agreement, develop the recommendation package and transmit to the Vice President of Conservation and the National Program Director (or their designees) for approval. The Wild Senior Director and Volunteer Co-Leads will also be addressed (cc'ed) on this communication. The recommendation will include the (a) recommendation; (b) rationale for the recommendation; (c) the positions and rationale for each involved entity; (d) any supporting materials deemed to be helpful.
6. The intent of this process is to achieve consensus. If all entities are not in agreement, coordinate discussions to achieve consensus. When consensus is reached, Lands Team Director will develop the recommendation package (per item #5 above) and transmit to addresses noted above in step 5.

7. If consensus cannot be reached, the Lands Team Director will refer the matter to the Wild Senior Director and Volunteer Co-Leads for a final recommendation. The Wild Senior Director and Volunteer Co-Leads will then develop a recommended position based upon the information available. The Lands Team Director will then transmit the Wild co-lead recommendation to the Vice President of Conservation and the National Program Director, including the notation that the involved entities were unable to reach consensus. In this circumstance (where consensus cannot be reached) the Lands Team Director will immediately inform those entities previously involved with the decision that the Wild Senior Director and the Volunteer Co-Leads together will be developing the recommendation. This recommendation package will include the (a) recommendation; (b) rationale for the recommendation; (c) the positions and rationale for each involved entity; (d) any supporting materials deemed to be helpful.

The role of entities with a stake in the decision:

1. Develop a written recommendation for the decision with supporting rationale as requested.

2. Transmit the above position and supporting materials to the Lands Team Director.

3. If negotiations are necessary to achieve consensus, support this coordination process.

Role of the Wild Senior Director and Volunteer Co-Leads:

1. Assign a level of urgency to the development of a recommended position per Paragraphs A, or B, or C above.

2. Develop a recommendation when the Lands Team and involved entities cannot reach consensus.

3. Ensure the integrity of the decision making process.

E. Coordination of Final Decision

Lands Team Director will distribute the decision of the Vice President of Conservation and the National Program Director to the directly involved entities as well as other entities that need to know. Utilize distribution lists to ensure that decisions are widely available to activists.

The wild.position.request@sierraclub.org email box will be regularly monitored by the Wild Senior Director or his designee, who will assign requests to the appropriate staff and volunteers for action (similar to the process described in the multiple entity involvement section). This group will then do appropriate research into existing Sierra Club policy, and consult with relevant Grassroots Network Teams, Wild Delivery Teams and involved chapter leaders as well as other internal and external key
stakeholders. If non-Wild campaigns are involved with the decision, the Wild Senior Director will coordinate as necessary. Afterwards, they will send their recommendation to the Vice President of Conservation and the National Program Director as well as the requesting entity. The Vice President of Conservation and the National Program Director will then respond with their decision back to the requesting entity, copying relevant staff and volunteers and other interested parties.

In cases where positions are needed related to regional, state and/or local matters, existing Sierra Club Jurisdiction Policy states:

“Chapters, groups, and other entities may develop positions in furtherance of Board-adopted policy on matters falling exclusively within their geographic boundaries or charge.”

This includes decisions on management activities and plans covering federal lands that are consistent with Sierra Club policy and does not involve federal legislation. Chapters should consult with neighboring chapters on management issues that cross chapter boundaries. If they can not agree on a common position, the position determination will be the responsibility of the Wild campaign.

Chapters are encouraged to draw on the expertise of the Grassroots Network teams and Wild Delivery Teams on management or federal issues. Other entities may suggest positions to chapters with jurisdiction on local matters, but they are not required to adopt a suggested position. The Wild Campaign reserves the right, with appropriate coordination, to take over position determination on any issue judged to be of national significance.

Such regional, state and local position taking are expected to be communicated to the appropriate Wild delivery team co-leads and relevant Grassroots Network leaders. Web links will be provided that identify each Wild initiative delivery team’s co-leads and relevant Grassroots Network leaders.

Once the Sierra Club takes a formal public position on federal legislation (or other vehicles as appropriate) and a bill is introduced in Congress, a group of staff and volunteers should be assembled that are familiar with the legislation and related issues in order to follow the bill’s progress. The size of this group should be kept small but at least include a Wild lobbyist and the requesting entity. Should the features of the legislation change in an unfavorable manner, this group must determine if the original Club position should be altered. If it is necessary to alter the Club’s position, then this group must so inform the original distribution that developed the initial position.