SIERRA CLUB WILDERNESS ADVISORY
WORKBOOK

FOR USE IN DEVELOPING AND IMPLEMENTING WILDERNESS CAMPAIGNS
AND SUBSEQUENT STEWARDSHIP OF WILDERNESS
Sierra Club Wilderness Advisory

Approved by the Conservation Governance Committee on June 26, 2008.
Updated May of 2015.

This advisory is appended to the Sierra Club’s Wilderness Management Policy, at http://www.sierraclub.org/policy/wilderness-management/wilderness-management

Thank you to the members of the Wildlands and Wilderness Team and its many friends and advisors for making this effort happen.

Want to join the Wildlands and Wilderness Team online or search for more information? Go to our Grassroots Network page at: https://content.sierraclub.org/grassrootsnetwork/teams/wildlands-and-wilderness-team

Updates on Wilderness and places we are working to protect are frequently posted to our Facebook page. Like us at: https://www.facebook.com/sierraclubwildlandsandwildernessteam
The purpose of this advisory is to increase the effectiveness of grassroots campaigns to designate and permanently protect wilderness. This document will help you prepare and implement your campaign.

Your Chapter is the local authority on the campaign to protect the special place(s) in your local area as part of the national wilderness preservation system. Achieving passage by the U.S. Congress requires a larger constituency, greater resources, and a wider range of viewpoints and authorities to consider. We are One Club. Accordingly there is help you can get and there are policies and entities which you need to consult. Policies are mandatory. Sierra Club support of national legislation must have the approval of the Vice President of Conservation and the National Program Director. Typically, they will seek guidance from the Our Wild America Campaign, related Grassroots Network Teams and Staff. This advisory will help you to navigate those waters.

Wilderness system is defined by statute, in the Wilderness Act of 1964 (Public Law 88-577). You should review the complete definition in Appendix I to this advisory. This law contains certain exceptions to its general rule. You may face pressure to expand the exceptions. As you begin your campaign, it is wise to assess where this might occur in your local situation and make plans on how to deal with these pressures, thus protecting the Wilderness Act along with the land. Look for opportunities to reinforce it, avoid actions that weaken it.

The objective of any Wilderness Campaign is to maximize the extent of the area to be protected while recognizing that the final product will be a product of the political process. Since politics is a complex activity involving give and take, it is important to recognize that exceptions to the Wilderness Act may be proposed and must be recognized as such by advocates. Such Wilderness Act exceptions are clearly a
concern and all considerations surrounding a final package must be kept in balance and viewed in context.

Wilderness designation is a highly political process where local interests require national support to become a reality. The complexities of the situation on the ground and the politics involved will necessitate compromises of some nature in order to arrive at a satisfactory protection package. Assess the likely compromises you may have to make at the front end of the campaign and do not be seduced into compromising too early – in general, once you compromise you cannot go back. Keep in mind that it is our job to ask for what we want and it is our Congressional champions’ job to obtain it, so be very careful about any compromises your group enters into. Departures from the options and approaches outlined in this advisory should be well thought out and the reasoning written down, and be prepared to defend them.

Develop and document a campaign plan that includes the following:

(1) Thoroughly documenting and mapping the land, resources and values to be protected, current management direction, existing impacts, impacts of designation (or the lack there of), and non-federal land ownerships;

(2) Prepare a proposal map and briefing book that collects the information noted above

(3) Prepare an outreach plan that defines campaign outreach goals: allies, other friends, Congressional champions, local elected officials, faith community, hunter angler, etc

(4) Consult the appropriate Sierra Club conservation committees and staff, because they can advise you and help you;

(5) Building a coalition of organizations, constituent allies and non-traditional allies who conduct a coordinated campaign in support of the wilderness proposal;

(6) Conducting a public education campaign that will cultivate a knowledgeable and supportive majority among the general public which supports the broad goals of the citizens’ proposal; and

(7) Engaging Congressional representatives to craft legislation embodying the citizens’ proposal which follows “best practices” (see Appendix V for an example of a “clean” bill) in legislative language so the law will effectively support the public’s efforts to protect the wild character of the land in question.

What action steps does your campaign need to take to achieve these 7 steps?
WILDERNESS, GLOBAL WARMING, AND FOSSIL FUELS

Wilderness has an essential part to play in the effort to protect our planet from global warming resulting from the excessive use of fossil fuels.

Wilderness designation assures the ability of healthy habitat to absorb excess amounts of carbon in the atmosphere. As the planet suffers the inevitable consequences of the excessive use of fossil fuels, plant and animal life will be forced to migrate in order to survive. The chances for successful migration will be greatly improved by the protection of large core areas of healthy habitat linked together by connecting migration routes. Wilderness designation is one of the premier ways to protect those core areas. The excessive use of fossil fuels has all too often been characterized by the abuse or destruction of natural areas in order to extract those fuels for use. The need to protect land and wildlife from these practices has motivated many wilderness campaigns. Wilderness designation protects the land from destructive mining practices and is an effective means of preventing the release of carbon into the atmosphere. The more wildernesses we have, the healthier the planet will be.

It may help your campaign to include global warming in its case statement. What will you say?
STEPS FOR A SUCCESSFUL WILDERNESS CAMPAIGN

(1) INVENTORY POTENTIAL WILDERNESS AREAS

Your proposal’s boundaries must be defined and mapped. If your proposal is to succeed, the land’s appropriateness for wilderness designation must be thoroughly documented so that it will withstand challenge and include all worthy areas. Your inventory should demonstrate how special the place is you are trying to protect. As part of the inventory you should identify issues that are likely to develop as a result of the designation. Wilderness campaigns are driven by issues and our success as advocates may be determined by how we anticipate and respond to those issues. To the greatest extent possible the land should be walked, ground-truthed, and documented via notes, photographs, and GPS coordinates. Include the invisibles such as underground pipelines (see Resources in Appendix VII).

Though Congress itself is the ultimate arbitrator, the Wilderness Act suggests that land meet certain criteria for designation. Ask yourself these questions. Is your special place primarily impacted by forces of nature rather than humans? Does it provide outstanding opportunities for solitude and unconfined recreation? Is it of sufficient size to make practicable its preservation and use in an unimpaired condition? Does it contain features of ecological, geological, scientific, educational, scenic, or historical value? (NOTE: Use this definition as a starting point to define the extent of a Wilderness proposal that may include environmental disturbance and damage either currently or in the past. The Agencies will use these descriptions as absolute criteria in order to exclude areas from their recommendations for Wilderness.)

Document the location and frequency of Wilderness attributes. Assess any ongoing uses that might not conform to the terms of the Wilderness Act. These uses typically include, mechanized or motorized forms of entry, or use of the land for commercial purposes. Certain uses that do not conform with the Wilderness Act, and any facilities associated with them, may be allowed to continue at the same level after your proposal becomes law if you are unsuccessful in getting them removed or reduced. It is helpful to have documentation of non-conforming uses at that moment in time so that incremental increases can be avoided later if they cannot be eliminated first.

A briefing book or justification document
should be assembled that addresses a number of issues and elements that you will need to understand for both the development of your proposal and the public portion of your campaign:

- **LIVESTOCK GRAZING CONSIDERATIONS.** Livestock grazing is generally the most widespread of uses that may be allowed to continue after designation and therefore a high priority should be given to understanding the trends of usage and the current level of permitted activity so that the cap allowed under the Wilderness Act will become a reality. Opportunities for an overall reduction of grazing and/or for eliminating it in portions of the proposed wilderness area should be identified and pursued. It will be essential to develop an understanding of the current levels of grazing use within the proposal area in terms of animal unit months (AUMs) allotted (active and suspended), number of active grazing permits, number of animals grazing, season of grazing use, any motorized use that takes place in support of grazing, etc. Review grazing permits and watch for special conditions and restrictions. In addition, define the grazing trends on Federal lands over time (is grazing increasing or decreasing), etc. Understand the total amount grazing activity that takes place on all lands in the region near your proposal. Consult the Grazing Policy and grazing experts.

An issue? ☐ Yes ☐ No  What needs to be done?

- **ISSUES THAT MAY ARISE FROM WILDERNESS DESIGNATION.** Examples include what the agencies may call non-conforming uses, as noted below; access to public lands when roads are closed and obliterated; potential water developments such as low head hydro; acquisition of non-Federal lands (state and private inholdings); timber cutting levels; economic impacts to local communities; etc.

An issue? ☐ Yes ☐ No  What needs to be done?
• **NON-FEDERAL LANDS.** Only Federal lands can be designated as Wilderness. Any non-Federal lands within your proposal must be identified. A mechanism for acquisition (purchase, exchange or donation) should be developed early in the campaign. These ownerships could include patented mineral claims, industrial forest owners, ranches, local irrigation districts, etc. Consider the implications of each acquisition mechanism on the ultimate land ownership patterns.

An issue? ☐ Yes ☐ No  What needs to be done?

---

• **CURRENT LAND MANAGEMENT ALLOCATIONS AND WILDERNESS STUDY AREAS.** Know the current management direction for your proposal with particular emphasis on Wilderness Study Areas (WSA). You should strive to propose all of the WSA for Wilderness if possible. Even the agency’s failure to manage the area compatibly for Wilderness, should not preclude it’s consideration for designation. Know the legislative or administrative source of all designations. For example, Congress enacted specific WSA language for certain National Forest units in Montana.

An issue? ☐ Yes ☐ No  What needs to be done?

---

• **ECONOMIC IMPACTS OF THE PROPOSAL.** Before the campaign goes public, an assessment of the proposal’s impact on the local economy should be prepared if significant levels of economic activity may be affected either positively or negatively.

An issue? ☐ Yes ☐ No  What needs to be done?
• **Current levels and types of recreation are also important to consider.** Document the negative impact of motorized recreation, and determine where motorized use occurs within the proposal area and the adjacent region. Off-road vehicle use, and its patterns of growth, is a primary threat to the health of the land. Motorized recreational interests will be one of your most difficult opponents. Mechanical and motorized access related to non-recreational uses (such as off-road vehicle use for commercial livestock management) should also be carefully documented so that your proposal can avoid their inclusion within designated wilderness. Consult the Off-Road Vehicle Policy.

An issue? □ Yes  □ No  What needs to be done?

---

• **Mining.** Mining is not allowed in Wilderness. If mining or prospecting has occurred within the proposal area, document the locations and damage (including the potential for Superfund sites along with clean-up considerations). Determine if any future mining or prospecting is under consideration within your proposal.

An issue? □ Yes  □ No  What needs to be done?

---

• **Forest considerations.** If forested landscapes where management activity has occurred will be part of your proposal (prior cutting does not eliminate eligibility), document stand age, cutting locations, and access methods (i.e. roads). Timber cutting is prohibited in Wilderness (see Sections 4(b), 4(c)). If forested landscapes are included in the proposal, advocates for protection should understand the effect on Agency cutting plans when designation occurs. Understand cutting trends as defined in agency plans and actual cutting levels (volume of logs).
• **WATER CONCERNS.** Water resources and statutes relating to reserved water rights should also be thoroughly researched and inventoried. Consult Federal Energy Regulatory Commission (FERC) database to understand the potential for hydro development. Understand the viability of each water development proposal.

**An issue? ☐ Yes ☐ No**  
**What needs to be done?**

*• ROAD ISSUES. If roads and/or vehicle routes are within the proposal area, they should be inventoried to ensure that their purpose and status is fully understood (i.e. open, closed, decommissioned, four-wheel drive only, passenger car, etc.).* Any road closures will raise access questions. Inventory the entire road system associated with your proposal, as well as adjacent Federal and non-Federal roads, so that closure mileage driven by the proposal can be placed into context against the total road net used by the public.

**An issue? ☐ Yes ☐ No**  
**What needs to be done?**

*• EXTRACTION THREATS MAY LOOM. When you document the current condition of the proposal, pay attention to any planned or potential extraction threats.*
• **VEGETATIVE HEALTH.** Determine the health and populations of native plants and wildlife (flora and fauna) in the area. Wilderness designation may be an effective means for protecting habitat for threatened or endangered species, so you should determine if any species listed under the Endangered Species Act are present. The existence of such species on the land in question may be a powerful argument for your proposal.

• **MILITARY USE.** Potential conflicts with military use should be evaluated and considered in an initial inventory. Engaging local military authorities with an eye towards negotiating an agreement should be considered.

These factors may influence your strategy. You may need to consider whether there are actions you can take in the interim that will reduce rapidly advancing damage. It might also affect the compromises you would be willing to consider in order to obtain designation sooner than might otherwise be the case. These can be tough, sometimes controversial, calls. Be sure you are making well informed decisions based on solid documentation.

**How will the above factors influence your strategy?** Reread the inventory considerations above, paying particular attention to the ones that are an issue for the wilderness proposal you are working. List below some additional factors or things you might consider changing in your strategy.
A major purpose of an inventory is to assist in preparing proposal maps and briefing books. Boundaries are best located on physical features or legal lines so that they include the ecological features and wilderness values for which you are seeking permanent protection. Roads are often among the most identifiable features and, where they cannot be closed, may provide a logical place for boundaries. Locate boundaries as close to roads as practicable. Previously disturbed land that can be expected to recover over time may enhance the integrity of the proposal. Such lands should be included inside the wilderness boundaries. Your final product should include photos (including aerials if available) and maps depicting the proposal, the resources to be protected, trails, roads, structures, and relevant issue descriptions, etc.

Conducting the inventory will also serve as an early means of expanding activist support for an eventual citizens’ proposal. An inventory necessitates cooperative work among organizations, the enlistment of volunteers, and the acquisition of financial and other resources – it is the point at which you will begin to build your coalition. The inventory will also provide “institutional memory” for your campaign – collecting, storing, and archiving the documentation on which your cause is based. The photos can be used to develop slide shows which are an excellent outreach tool.

Foreseeing the issues associated with your proposal is important not only to defend your proposal but also to support your champions (lead sponsors and other primary Congressional supporters). Be prepared for opposition from off-road vehicle (ORV) groups, cattlemen’s organizations, mountain bikers, the timber industry, developers, etc., depending on your local circumstances.

When other organizations are conducting an inventory in preparation for an eventual citizens’ proposal it is recommended that Sierra Club Chapters or Groups in the area participate prominently in the process, especially the mapping and documentation, so the Club’s interests will be reflected in the ultimate product.

(2) GET THE POWER OF “ONE SIERRA CLUB” BEHIND YOUR PROPOSAL

The historical and institutional experience of the Sierra Club with wilderness campaigns is an immense resource. You can begin to take advantage of this as soon as a decision is made to pursue a wilderness designation. The Sierra Club has substantial staff and volunteer resources that can be of benefit. You can start by identifying and contacting the Wildlands and Wilderness Grassroots Network Team and the Our Wild America Campaign as well as any other relevant Grassroots Network Team. Here you will find wilderness expertise and those with supplemental knowledge regarding issues important to your particular proposal. Local and national staff assigned to your area should be consulted as your efforts begin. Other Programs can provide advice for engaging non-traditional allies and coalition partners for your campaign. The Advancement staff may be able
to provide advice and support for fundraising efforts. The staff of the Lands Team in Washington D.C. will be essential to the ultimate passage of the legislation implementing your proposal. Avail yourself of these resources.

There are several Sierra Club policies with which any proposal must comply. Be certain to review them in the earliest stages of your campaign. The policies are:

<table>
<thead>
<tr>
<th>Policy</th>
<th>Applies to my campaign</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Forest Management in the United States</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Lands Forest Management</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ancient Forests</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Temperate Rainforests</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tropical Rainforests</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial Logging</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Off-Road Vehicles</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Energy Resources¹</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Federal Public Lands Grazing Policy</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Military Use of Civilian Airspace and Public Lands</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Land Exchanges</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wilderness Management</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fire Management on Public Lands</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Principles of Natural Quiet</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Temperate Rainforests</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>User Fees of Public Lands</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Winter Sports</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

All of these policies can be found at [http://sierraclub.org/policy](http://sierraclub.org/policy). Follow up on all policies marked yes above.

Experience has led to the establishment of several processes and policies intended to assure the best total organizational support for each individual campaign. The Planning Matrix contained in the Grassroots Training Manual mentioned below is the product of Club experience in effective campaign planning.

No federal wilderness legislation may be supported or opposed by any Sierra Club entity, including Chapters, until approved by the Vice President of Conservation and the National Program Director. This requirement is found in the Jurisdiction within Sierra Club section titled II. Positions and Discussion Documents, posted on Clubhouse at

¹ In the new 2006 Energy Resources Policy, see especially Section VI. “Consideration for Special Designations” and Section VII.6.B. “Resources Preferred by the Sierra Club” paragraphs three and four. These sections of the Energy Resources Policy discuss the impact of alternative energy developments on lands including those designated as or being considered for designation as wilderness. See also Forest Biomass. Energy campaigns as well as wilderness campaigns need to comply with these portions of the Energy Policy.
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.

An important role of national committees is to serve as advisors to groups, chapters and other Sierra Club entities throughout this process. *Consultation should take place before participation in the drafting of legislative language*. You must do this before agreeing to any specific terms in your legislative proposal. This requirement includes legislation related to land designations, authorization and appropriations. Start by identifying and contacting the national committee(s) with wilderness expertise and those with supplemental knowledge regarding issues important to your particular proposal. See the Process at: [https://content.sierraclub.org/grassrootsnetwork/documents/taking-federal-positions-wildlands-issues](https://content.sierraclub.org/grassrootsnetwork/documents/taking-federal-positions-wildlands-issues)

**What action steps need to be taken to gain Sierra Club approval for the wilderness legislation you are working on?**

---

**(3) FORM A COALITION**

Before an official citizens’ proposal is announced, it is wise to develop the broadest possible formal coalition of organizations who will support it. Achieving up-front unity among environmental organizations with an interest in the land will help avoid subsequent disagreements and divide-and-conquer strategies by the opposition. A coalition is vital to maximize the political and financial resources available for what is likely to be a lengthy campaign. It may be useful for the coalition to have an executive committee made up of representatives from the primary
participating organizations and empowered to make decisions. The Utah Wilderness Coalition Protocol is a good example for maintaining an effective working coalition over the long haul (see Appendix III). Your coalition should develop a written campaign plan. Develop both a solid proposal and well-thought-out campaign plan prior to public release of the proposal, in order to be best prepared for the opposition that occurs with any Wilderness campaign.

The coalition should strive to gain support from allied constituencies beyond the traditional environmental community. These might include the faith community, businesses, hunters and anglers, scientists and other academics, archeological societies, etc. Where possible it would be wise to gain endorsements from groups such as mountain bike associations, ranchers, units of local government, individual elected officials (such as county commissioners, state legislators, mayors, and city council members), Native American tribes, labor unions, religious leaders and organizations, and other non-traditional allies. These endorsements might eventually necessitate some bargaining that could affect the boundaries and legislative content of the final citizens’ proposal. The Club’s leadership may have useful information regarding potential allies among such constituent groups. Your coalition will have to analyze the costs and benefits of such agreements for the overall goal of wilderness protection.

Any Sierra Club entity proposing to formally affiliate with other groups (join or form a coalition) must apply for and receive national approval. Please see Appendix II for the details.

Attaining the widest and deepest possible support prior to the release of the citizens’ proposal will put you in the strongest possible political situation for ultimate victory.

(4) GENERATE POSITIVE PUBLIC OPINION

Public opinion is an essential element of any successful legislative campaign. Congress designates and agencies administer, but it is the quality and quantity of public support that motivates them to do their job well. Elected officials are extremely sensitive to public opinion on matters as visible as wilderness designation. It is advisable to conduct a public education campaign (including a media campaign) in order to attain and demonstrate the support of the majority of the general public.

What you say is important. The more you can ascribe local values to your threatened place, the stronger your local support will be. Likewise, when addressing a broader audience, the more you can ascribe national values, the stronger the support. Connect your proposal to children. Wilderness is a family value. You are protecting a national treasure for future generations. People support
wilderness because they value it, so speak in terms of values that the majority of people can identify with: legacy, heritage, stewardship, responsibility, “caring for God's Creation,” freedom, and fairness.

Who speaks is important as well. People don’t like conflict. Ask ranchers, hunters, church goers, and business owners to speak for your proposal. Make the broad range of support your proposal has gained visible to the general public. Creating events which garner extensive earned media coverage is important. Consider public hearings and reports from elements of your coalition or allies relating the proposal’s benefits to their area of interest. Door-to-door education in sympathetic communities is a good means of building support and expanding your volunteer base. Large public meetings, scientific polling, and formal endorsement from local governmental entities can demonstrate the extent of your support. Use public events (such as fairs and festivals) to reach out broadly to the public.

The quality of your coalition, allied community, and public education efforts will go a long way to determining how much of the wilderness land you will actually be able to get designated. It will also be vital to assuring the successful long-term implementation of your ultimate legislative victory.

*The Sierra Club Grassroots Training Manual* is especially useful in preparing this step of your campaign (see Chapter 6, “Crafting Your Campaign Communication”).

### (5) CULTIVATE YOUR CHAMPIONS

If your potential champion(s) already sympathizes with our positions, this process is likely to be happening throughout all the above steps. Even if our targets are not automatic supporters it is wise to develop a relationship with key staff members early on. Show them high-quality photographs. Take them out for field trips, tours, outings and other activities to educate them on the issues and begin to build their understanding of and support for wilderness. It is important to meet regularly with the Representative’s and Senator’s staff members to keep them informed of our progress and address their questions and concerns as the campaign proceeds. This is a relationship-building effort and involves a lot of time, care and commitment.

Most members of Congress require
excruciating attention to addressing potential conflicts and opposition before any bill is introduced. Your credibility with decision makers will be built upon the careful attention to detail with which you have prepared your proposal, coupled with your knowledge of the land as well as your understanding of the related issues. It is essential that we answer all their questions. Your honesty, thoroughness and credibility will go a long way toward garnering the respect and trust you will need from your Congressional supporters. Be very forthcoming about allies and opponents. Your credibility will increase not only your supporters’ enthusiasm but also the likelihood of achieving protection for what you seek. Sierra Club may be asked to consider compromises, such as where to shave acreage, how to address conflicts, etc. Your credibility is your most important asset. Provide accurate and timely information to Congressional staff. A top quality inventory (including maps and photos) will be invaluable at this stage.

In addition to regular communication, there are many things we can do to tighten relationships with champions or potential champions. A strong letter-writing, petition, postcard and/or email campaign is important to moving your targets forward. Also, unless there is a request not to, remember to database all contact information into Helen with your campaign as an Interest. That way, you will have a ready list of people to call on as your campaign moves forward.

“Power maps” are a great tool to define how to influence the member of Congress through his or her friends and other influential people. If appropriate, provide evidence that the proposal will enhance the local economy, jobs and income in the community. Positive support from local legislators (cities, counties, state) from across the state, but particularly those representing the local area, will be viewed by others as a strong indicator of public opinion and a motivator for your member of Congress. Mentioning wilderness in unexpected ways or places (say, at a Kiwanis breakfast she is attending) is a big boost. And don’t forget working on their re-election campaigns, which is something almost no other wilderness group except the Sierra Club can legally do.

If your Congressional representatives are unlikely to support your campaign you will need to devise a strategy to protect the land without their support. The quality of your early inventory, coalition, and public outreach efforts is essential. Dealing with the opposition is largely a matter of political power which in turn will depend on the strength of your coalition and alliances and the level of support you have attained among the general public. Your inventory will tell you whether the land
can afford to wait out the opposition and whether there are opportunities for an interim strategy built around agency management decisions and/or the judicial system. It is best to consider all of your alternatives before starting down the road of substantial changes to your proposal.

**LIST YOUR TARGETED CHAMPIONS**

_________________________________________________

_________________________________________________

_________________________________________________

_________________________________________________

_________________________________________________

_________________________________________________

_________________________________________________

_________________________________________________

Secured? □ Yes □ No

Secured? □ Yes □ No

Secured? □ Yes □ No

Secured? □ Yes □ No

Secured? □ Yes □ No

Secured? □ Yes □ No

Secured? □ Yes □ No


**LEGISLATIVE PROVISIONS**

Once your proposal is public you may face some tough choices when it comes to addressing the concerns of unexpected opposition. A well-crafted proposal taking into account both the ecological and political circumstances of your locale should help reduce these difficulties. The information below is intended to help you anticipate some of those circumstances.

In drafting legislation, avoid language that could lead to precedents that would weaken the Wilderness Act. What is good in one area may do harm in another. Begin with as “clean” a proposal as possible. An example of a “clean” bill is in Appendix V of this advisory. If you eventually feel it necessary to add other provisions because of specific local circumstances on the land or in the politics you should do your research and obtain approval from the appropriate Sierra Club entities before proceeding.

You can find all past wilderness laws and wilderness management policies for federal agencies at [www.Wilderness.net](http://www.Wilderness.net) which is a partnership project of the [Wilderness Institute](http://www.wilderness.org) at The University of Montana’s College of Forestry and Conservation, the [Arthur Carhart National Wilderness Training Center](http://www.carhartwildernesscenter.org), and the [Aldo Leopold Wilderness Research Institute](http://www.aldoleopold.org).

Before developing legislative language, consider contacting the Wildlands and Wilderness Team and other national team(s) with wilderness expertise as well as those with supplemental knowledge regarding issues important to your particular proposal. This will help you achieve the strongest possible bill, while complying with the One Club policy.

Aim high. Having created a strong and broad coalition of support you want your proposal to contain the best deal for the land. **You or your Congressional champion may have to negotiate later, so don’t give things away at the start.** Begin with the best – because once a bill is written it is very hard to improve. Achieving “clean” legislative language requires up-front organizing. **To get the best possible language in your law, organize before the language is written.** Your proposal should reflect the strength and vision of your coalition.
The following advice on specific legislative issues is subject to the above caveats:

ADVISORY BOARDS

Advisory boards complicate land management and are unlikely to promote wilderness values. Don’t include them in your proposal. Such committees have tended to advocate increased logging of federal forests and they shift power to localities where the Club has few members. Permanent committees often burn out volunteers leaving paid industry staff to attain their goals.

Recent laws have incorporated Advisory Boards as a means of gaining support from potential opponents. Several negative lessons can be learned from these experiences. First, if the bill sponsors insist on including an Advisory Board, the statutory language should be crystal clear that the Advisory Board is just that – advisory. Any such entity should not preclude use of the National Environmental Policy Act or the Administrative Procedures Act. Second, seek at least a 50 – 50 split in membership between wilderness and non-wilderness users. Since wilderness is about land protection, that fact should be reflected in the composition of the advisory panel. Third, include a sunset provision where the Advisory Board would automatically expire unless reapproved by Congress.

What are you doing about advisory councils?

__________________________________________________________

__________________________________________________________

__________________________________________________________

ALTERNATIVE DESIGNATIONS

Alternative designations (such as Backcountry Area, Scenic Area, National Recreation Area, etc.) complicate land management and are less likely to promote wilderness values. Don’t include them in your proposal for those lands that are best protected as Wilderness -- the Wilderness Act provides the strongest protection for such land. You may want to consider such a designation if a use that does not conform to the Wilderness Act appears politically unavoidable.
BOUNDARY ISSUES

Draw boundaries that protect all of the critical features of the area. Your unit boundaries should generally conform to natural boundaries in the landscape such as watersheds but follow geographic features and legal lines that can be identified on the ground. Include the broadest spectrum of the ecological communities in the area. Sometimes there are benefits to aligning with a political boundary. Inside the proposed boundary, rarely used roads and off-road vehicle routes will be closed. Where pre-existing uses or inholdings are involved, access may not be denied. Allowed access should be limited to non-motorized means if possible. If this is not possible, the access will be legally limited to parties such as land managers or the local rancher under specified circumstances. Provisions for purchasing or exchanging inholdings or sunsetting pre-existing use privileges will serve to increase the land’s wilderness character. Boundaries should facilitate management of the area as wilderness. The larger the contiguous core, the greater the integrity of the proposal. Your campaign plan should assume inholdings will be acquired after designation.

In general, the proposal should consist of units 5,000 acres or greater, subject to exceptions in the Wilderness Act of 1964 or the Eastern Wilderness Act (smaller units are allowable east of the...
Mississippi). A proposal that is contiguous with an existing conservation unit (National Park or Wilderness Area) may be smaller than 5,000 acres.

Cherry stemming is the practice of using existing roads or trails already open to motorized or mechanized use (such as mountain bikes) as non-wilderness corridors (or “cherry-stems”) into the surrounding wilderness. In the case of regularly used or open roads and trails it may be unavoidable, because motorized and mechanized transport is illegal in wilderness and eliminating such use may be politically difficult. In such instances the non-Wilderness corridor should be as narrow as possible so as to preclude the possibility of commercial developments within the cherry stem. Where there are rarely used roads and trails it is advisable to have them closed via wilderness designation. Such closures may need to be negotiated with non-wilderness user groups or elected officials in order to attain overall wilderness goals.

What boundary issues are present?

FIRE, INSECTS, DISEASES, INVASIVES, AND WILDLIFE HABITAT MANAGEMENT

Fire, insects, disease, invasives and wildlife habitat management affecting the wilderness quality of the area will be retained in federal hands (be careful of state and local entities seeking to claim control – states retain authority for fish and wildlife management). Your proposal should remain silent on management techniques (silence in effect defers to the Wilderness Act). Fires will be managed primarily by the forces of nature, with minimal exceptions in the Wilderness Act such as fire threats to human safety. Any management activities will be conducted in accordance with the minimum tool standard as defined by regulations under the Wilderness Act.

What are you doing about invasives and habitat management issues?

FOREST WILDERNESS

Sierra Club has a policy, determined by vote of the members, to end commercial logging on federal lands. Wilderness designation for forested lands will eliminate the potential for commercial logging on the land proposed as wilderness. Do not accept legislative language regarding areas not
included in the wilderness designation that could facilitate increased logging in those areas. Activists should strive for proposals and resulting legislation which attain a net overall decrease in commercial logging activity.

National Forest regulations contain a number of provisions that protect roadless areas. Wilderness activists should be careful to assure that a wilderness designation does not result in a weakening of overall protection for larger forested roadless areas via release language or other legislative provisions. If the entire area deemed eligible for wilderness designation is not included in the legislation, activists should be careful to ensure that the option of attaining wilderness designation remains open to future campaigns.

While advocacy for site-specific protective designations of federal forests is often driven by a chapter or group, these bills have national impact and may set precedents. The overall strategy is to prevent a downward spiral of compromises where the prior compromise becomes the starting point of negotiations for the next land protection bill.

Use the principles of conservation biology when seeking wilderness designations. These principles are: protect the best remaining habitat, remove the stressors of that habitat, and restore damaged habitat. Here are three desirable outcomes to advocate for:

a. **Protect the Best**: The best remaining wild forests are permanently protected on a scale that allows natural disturbance (wind, fire, disease, and insects) to maintain biodiversity. Included are rare forest types, old-growth, riparian forests, large un-fragmented blocks of naturally regenerated forest, and the full range of natural landscape scale ecological types in the protected area.

b. **Remove the Stressors**: Commercial logging and associated road-building cease or are eliminated.

c. **Restore the Rest**: Forests damaged by human activity are restored as natural ecosystems.

Desirable wilderness bills are “clean,” meaning they do not contain “quid pro quos” such as legislatively mandated increased logging outside the protected wilderness areas, and other anti-conservation measures. Typical undesirable forest specific “quid pro quos” are outlined in the “provisions to avoid” section of this advisory. Specific desirable outcomes:

1. **Protect Forests Threatened with Logging** (lands that contribute to the cut volume are known as the timber base): In general, viable Wilderness proposals will be constrained in extent by unroaded landscapes. Include as much natural or restorable forest as possible in protected areas. Start big and inclusive. Boundaries should be drawn using landscape ecosystem concepts to include, for example, biologically rich lower altitude or riparian forests and not just include high altitude “rocks and ice”. Even small remnants of natural forests are worth preserving, especially in the eastern and southern regions where they are so rare.
2. **Include Roadless Areas:** It is very desirable to include the 2001 Roadless Conservation Rule forest areas in bills for designations offering even more protection. Where practicable, include all roadless lands, whether inventoried by the Agency or not.

Below is guidance on specific forest trade-offs you may be asked to make in stakeholder groups or in negotiations with Congressional or agency staff or allies:

- **Ecological Harm:** Avoid increasing logging, or specifying (i.e. guaranteeing) the volume of logging, or changing forest structure, patch size or vegetative composition away from natural patterns in forests outside the proposed wilderness boundary. Sierra Club opposes commercial logging of federal land. Be aware that a shift of logging from the protected area to federal forests in the vicinity may be facilitated by legislative language, research projects, stewardship plans or logging subsidies.

2. **Federal Forest Biofuels:** The Club’s Energy Policy (2006) specifically states that use of federal forest biomass for energy is opposed by the Club. Legislation you advocate should not require, subsidize or facilitate wood removals for forest biofuels on federal lands. Forest biomass removal on other ownerships may be supported only under narrow conditions—see the energy policy.

3. **Roadless Areas:** Oppose logging, oil and gas leasing and road building in the 2001 Roadless Area Conservation Rule inventoried areas and in other federal wild forests that the Club advocates being added to the roadless inventory.

4. **In-holding Trades:** It is acceptable to advocate trading federal lands for private or non-federal in-holdings in accordance with the Club’s land exchange policy unless it creates a net increase in logging or fragments roadless area forests outside the wilderness boundary.

5. **Exceptions to Forest Protection Laws and Regulations:** Exemptions from forest protection laws, Forest Plan Standards and Guidelines, rules or agency policies for federal forests outside the proposed wilderness or other protective classification must be avoided. This includes a legislative determination (sufficiency language) that a federal action, forest plan or logging or roadbuilding project complies with NEPA or other environmental laws without the otherwise required agency study or public involvement. Respect full rights for public involvement in forest decisions. Do not support limits on administrative or court appeal rights on logging or roadbuilding outside the proposed wilderness.
6. **Transfers of Forest Management Authority to State or Local Governments or Private Timber Companies:** Delegation of management authority of National Forests must be opposed. Delegation would set a terrible precedent for all federal forests. Federal protections, while not strong enough, are still much stronger than most other jurisdictions.

In general, when working with federal wilderness legislation, consider contacting the Our Wild America Campaign or relevant Grassroots Network teams with advanced wilderness knowledge, roadless area expertise, and/or supplemental knowledge regarding issues important to your particular proposal.

**What forest issues are you dealing with?**

________________________________________________________________________________________

________________________________________________________________________________________

________________________________________________________________________________________

**LAND EXCHANGES**

See suggestions for non-federal lands inventory on page 3 and note the optional mechanisms for land acquisition. For legislated acquisitions, take care to safeguard judicial review, appropriate appraisals, and public disclosure and participation.

**What are you doing about land exchanges?**

________________________________________________________________________________________

________________________________________________________________________________________

________________________________________________________________________________________

**LAND SALES AND DEVELOPMENT ADD-ONS**

The success of the wilderness movement in combination with the countervailing pressures created by urban sprawl has given rise to a number of public lands bills which override established law and combine wilderness designations with public land sales and leases designed to accommodate development and water use plans.

Your proposal should not include any provisions for sale of public lands. Should such a sale become part of a wilderness bill, any provisions for land sales should comply with applicable law (including
NEPA, FLPMA and FLTFA) and meet the same standards as those outlined for land exchanges in the Sierra Club’s land exchange policy.

What are you doing about land sales or development issues?

OFF-ROAD VEHICLES

Do not support legislation that allows motorized vehicles inside wilderness, and avoid any provisions that legislate specific ORV routes outside wilderness or otherwise facilitate ORV use as a quid pro quo. Contact national committee(s) with ORV expertise and those with supplemental knowledge regarding this set of issues.

What are you doing about off-road vehicles?

RELEASE LANGUAGE

Release language may be used in wilderness bills to address areas with interim protection that are NOT designated as wilderness, but are released for other purposes. Your proposal should be silent on release language. This will allow the undesignated lands to be considered for designation at a later date. If the give and take of the campaign should require the inclusion of any release language it should be soft release (short term; limited) so that the general legal provisions allowing for consideration of future designation are retained. Oppose so-called hard release which prevents the area from being considered for wilderness again in the future.

What are you doing with release language, if any?
WATER RIGHTS

The specifics of this section await review of a Board appointed Task Force and final decision. In the meantime, good general advice is to strive to retain the maximum amount of federal waters rights possible. Water rights issues vary considerably from state-to-state so you may want to consult with local and national Sierra Club staff and the Wildlands and Wilderness Team.

What are you doing about water rights?

CONCLUSION

Be polite. Be patiently persistent. Be determined.

Don’t give up, and don’t give in. The Wilderness Act took many years to pass, as did most individual wilderness bills which came afterward. Wait for the best time to get the best protection for the land, and keep the door open for future wilderness advocates to come back for more. However, recognize that in waiting, time may not be your side if non-conforming uses are expanding.

John Muir fought for years to bring protection to the Yosemite Valley, and it took another century for the Sierra Club and others to incrementally bring protection to most of the rest of the Sierra Nevada, Muir’s Range of Light, and that struggle continues today. Use time to build support and be ready for the right time to act. Your legacy is not only the land you eventually save, but also the enhancement of the opportunity for others to do the same after you.
APPENDIX I – WILDERNESS DEFINITION IN THE WILDERNESS ACT

The Wilderness Act defines wilderness as, “A wilderness, in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.”

APPENDIX II - AFFILIATIONS

An affiliation is a formal association between a Sierra Club group, chapter, or regional conservation committee, or the national Sierra Club, and another organization or a coalition. Affiliations should be carefully considered, because inappropriate connections with organizations could lead to lawsuits or to a threat to the tax-exempt status of the Sierra Club.

Affiliations are for loose-knit working relationships between organizations with a common purpose. More complicated affiliations involving hired staff and assets will be handled on a case-by-case basis, and may require review by legal staff.

Any chapter or group, or the national Sierra Club, may affiliate with another organization provided that the criteria listed below are met. The other organization or coalition must operate completely within the territory of the chapter or group requesting affiliation. For chapter applications, the chapter's executive committee must approve in writing. For group applications, both the group and the chapter executive committees must approve in writing. If the other organization operates in two or more chapters other than California or Nevada, it becomes a national affiliation and should be referred directly to the Campaign and Programs Co-Leads. In California or Nevada, affiliations involving more than one chapter should be referred to the California Nevada RCC.

All Club entities desiring affiliation with other organizations must receive national approval. A completed Application for Affiliation must be submitted and approved by the Campaign and Programs Co-Leads. A copy of this form is in Clubhouse at http://clubhouse.sierraclub.org/administration/policies/activism/affiliation-request.aspx.
APPENDIX III – EXAMPLE OF A COALITION PROTOCOL
(From Utah Wilderness Coalition)

All Coalition partners agree to jointly make collective decisions regarding the scope, nature, and message relating to our wilderness proposal and campaign.

This means that when new issues arise concerning our wilderness proposal or campaign, the coalition will endeavor to vet these new issues within the Coalition, preferably at regular Coalition meetings or, at a minimum, through a joint call with the coalition executive committee members before a conservation partner communicates with an elected official, the media, or an agency decision maker. New issues are those caused by a change in policy or tactics or an issue that is not covered by past policies. The presumption is that we will be able to make our decisions collectively. When we can’t come to an agreement on a common approach, we agree to respectfully disagree and discuss how we will handle this disagreement publicly.

Further, we agree as Coalition partners to stick to our strategy and message when communicating with the media, elected officials, and funders.

We will not denigrate the roles and/or positions of our partner organizations outside the coalition.

If a partner has criticism of another partner’s work on an issue in which we commonly work, then the criticizing partner agrees to talk to the person at the source of the perceived problem before talking to others.

We agree to share any information on our common issues equally with our coalition partners.

In communication to our membership, the media, or funders we give fair credit to our partner’s work.

We plan our work on our common issues together. This includes fundraising.

APPENDIX IV – WILDERNESS LANGUAGE
By way of introduction, research shows that despite the best intentions of the law the National Wilderness Preservation System is degrading. One of the main reasons is the preponderance of special provisions or non-conforming uses being included in Wilderness bills. This is something the Sierra Club’s Wildlands Wilderness Team has recognized and been concerned with for some time. These provisions not only allow activities within Wilderness that are inappropriate and degrade individual areas, but more importantly the cumulative impact of these provisions threatens to diminish the core values that distinguish Wilderness from other public lands.

• This brief report provides examples of problematic legislative language, why it is a problem, and alternative language--the Wilderness Act--to avoid problematic language. Those who don’t know exactly what the Act says may find this useful. On the back of this report are examples.
When talking with members of Congress, it is helpful to suggest that wilderness legislation avoid non-conforming uses. Suggest that Congress keep proposals for designating new Wildernesses clean. This is done by keeping wilderness bills brief and free of special management language, even if the intent of the language is simply to reiterate the provisions of the Wilderness Act. Some in Congress may be tempted to rephrase the provisions of the Wilderness Act. Saying the “same thing” in different words inevitably leads to different interpretations of what was intended by the new law.

It may be possible to suggest that Congress place the non-conforming uses outside of the wilderness boundary. It could also be suggested to members of Congress that alternative designations, as suggested in the revised advisory, be used in instances where special provisions that compromise the ability of the agency (or agencies) to administer the area as Wilderness can’t be avoided. (NOTE: Potential wilderness has been designated in several bills. Once the nonconforming use is removed, the area becomes Wilderness) [Legislative language authorizing the Secretary to reclassify “potential wilderness” should clearly articulate that ONLY when the nonconforming use is eliminated can “potential wilderness” be designated Wilderness. There is the real threat that the nonconforming use will be allowed to continue at the discretion of a careless or malevolent bureaucrat].

Examples
Special language allowing motorized and/or mechanized access for fish and wildlife management provides an example of how a narrow exception in one bill evolves into highly destructive exceptions in future bills.

The Wilderness Act notes:
Nothing in this chapter shall be construed as affecting the jurisdiction or responsibilities of the several States with respect to wildlife and fish in the national forests.

Problematic Language:
Subject to paragraph (x), the Secretary may authorize structures and facilities, including existing structures and facilities, for wildlife water development projects, including guzzlers, in the wilderness areas designated by subsection (xy) if— (A) the structures and facilities will, as determined by the Secretary, enhance wilderness values by promoting healthy, viable, and more naturally distributed wildlife populations; and (B) the visual impacts of the structures and facilities on the wilderness areas can reasonably be minimized.

Consistent with section 4(d)(1) of the Wilderness Act (16 U.S.C. 1133(d)(1)) and in accordance with appropriate policies, such as those established in Appendix B of House Report 101–405, the State may use aircraft (including helicopters) in the wilderness areas designated by this subtitle to survey, capture, transplant, monitor, and provide water for wildlife populations, including bighorn sheep, and feral stock, feral horses, and feral burros.
Some bills have used the actual wording of the Wilderness Act noted above, which does not mention motorized equipment, rather than the problematic language that has appeared in various bills. Suggesting this be done could prevent problematic language from being inserted.

While there is broad discretion in the control of fires, some language would give agencies the ability to cut fire lines and thin in Wilderness before fires are even started (pre-suppression).

The Wilderness Act notes: In addition, such measures may be taken as may be necessary in the control of fire, insects, and diseases, subject to such conditions as the Secretary deems desirable.

Problematic Language:
PREVENTION OF WILDFIRES. The designation of wilderness under this section shall not be construed to interfere with the authority of the Secretary of Agriculture to authorize mechanical thinning of trees or underbrush to prevent or control the spread of wildfires, or conditions creating the risk of wildfire that threaten areas outside the boundary of the wilderness, or the use of mechanized equipment for wildfire pre-suppression and suppression.

APPENDIX V – EXAMPLE OF A “CLEAN” BILL (e.g., Scapegoat Wilderness)

Public Law 92-395

AN ACT

To designate the Scapegoat Wilderness, Helena, Lolo, and Lewis and Clark National Forests, in the State of Montana.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled. That, the area known as the Lincoln Back Country as generally depicted on a map entitled “Proposed Scapegoat Wilderness”, dated May 19, 1972, which is on file and available for public inspection in the Office of the Chief, Forest Service, United States Department of Agriculture, is hereby designated as the Scapegoat Wilderness within and as part of the Helena, Lolo, and Lewis and Clark National Forests, comprising an area of approximately 240,000 acres.

SEC. 2. As soon as practicable after this Act takes effect, the Secretary of Agriculture shall file a map and a legal description of the Scapegoat Wilderness with the Interior and Insular Affairs Committee of the United States Senate and House of Representatives, and such description shall have the same force and effect as if included in this Act: Provided, however, That correction of clerical and typographical errors in such legal description and map may be made.

SEC. 3. The Scapegoat Wilderness shall be administered by the Secretary of Agriculture in accordance with the provisions of the Wilderness Act governing areas designated by that Act as
wilderness areas, except that any reference in such provisions to the effective date of the Wilderness Act shall be deemed to be a reference to the effective date of this Act.

Approved August 20, 1972

**APPENDIX VI – EXAMPLE OF A WILDERNESS INVENTORY**

*(From Utah Wilderness Coalition’s ten steps to preparing an inventory)*

*(These are headings only – to obtain full text, contact the Wildlands Committee)*

1. Engage conservation partners early.
2. Identify those lands requiring field checking.
3. Identify conflicts, the invisible issues [including water rights].
4. Organize field checking packets and recruit field checkers.
5. Assign field checking, conduct, and coordinate field checking.
6. Review returned field work.
7. Technical team meetings.
8. Coalition partners resolve remaining tough calls.
10. Implement the inventory.

**APPENDIX VII – RESOURCES**

*The Sierra Club Grassroots Training Manual* is an excellent resource to assist in preparing a wilderness campaign. It’s available at [http://clubhouse.sierraclub.org/leaders/training/training_manual/index.htm](http://clubhouse.sierraclub.org/leaders/training/training_manual/index.htm)

This Advisory will help you adapt its guidance specifically to a wilderness campaign.

*Thank you to all who contributed photography for this effort.*

Cover Photo © by Brian Pasko and used with permission
Photo page 5 © by the Allegheny Defense Project and used with permission
Photo page 6 courtesy of Mike Painter
Photo page 7 courtesy of Jill Workman
Photo page 9 courtesy of Clayton Daughenbaugh
Photo page 10 © by the Allegheny Defense Project and used with permission
Photo page 12 courtesy of Jill Workman
Photo page 14 courtesy of Karl Forsgaard
Photo page 15 courtesy of the Sierra Club
Photos page 16 courtesy of Jill Workman
Photo page 17 courtesy of Clayton Daughenbaugh
Photo page 20 courtesy of Bill Hart
Photo page 23 © by the Allegheny Defense Project and used with permission