WILDERNESS GRAZING CHECKLIST

**PURPOSE:**

The purpose of this document is to provide wilderness managers and range specialists with a checklist of wilderness topics and issues that should be considered when revising Land Management Plans (LMPs), Allotment Management Plans (AMPs), and grazing permits. The checklist is divided into two parts:

Part A provides a list of topics and questions to consider when completing grazing permits.

Part B provides a list of topics and questions to consider in the AMP and associated NEPA documents to help ensure effective grazing management in wilderness and implementation of the LMP direction.

**DEFINITIONS:**

**Allotment:** A designated area of land available for livestock grazing.

**Allotment Management Plan (AMP):** AMPs contain the pertinent livestock management direction from the project-level NEPA-based decision related to a specific grazing allotment. AMPs also refine direction in the project-level NEPA-based decision deemed necessary by the authorized officer to implement that decision.  Management direction in the AMPs must be within the scope of the project-level NEPA decision. They are developed in consultation with the affected grazing permit holders.

**Commercial livestock grazing:** Grazing that occurs in wilderness under the auspices of an active grazing permit.

**Congressional Grazing Guidelines:** House Report 96-617, appended to the Colorado Wilderness Act of 1980 and incorporated by reference in the Arizona Wilderness Act of 1990. Among other things, the Congressional Grazing Guidelines provide that activities or facilities established prior to the date of an area's designation as wilderness should be allowed to remain in place and may be replaced when necessary for the permittee to properly administer the grazing program.

**Grazing Permit:** Any document authorizing livestock to use National Forest System or other lands under Forest Service control for the purpose of livestock production.

**Occasional Use of Motorized Equipment:** Motorized use for the maintenance of range improvements or other activities that may be authorized if the use meets all of the following criteria:

1. it occurred in the area prior to wilderness designation or was established by prior agreement;
2. practical alternatives are not available; and
3. such use would not have a significant adverse impact on the natural environment

**Range Improvement:** Any activity or program on or relating to rangelands which is designed to improve production of forage; change vegetative composition; control patterns of use; provide water; stabilize soil and water conditions; and provide habitat for livestock and wildlife. The term includes, but is not limited to, structures, treatment projects, and use of mechanical means to accomplish the desired results (43 U.S.C. 1902).

**Non-structural Improvements:** Practices and treatments undertaken to improve range not involving construction of improvements.

**Structural Improvements:** Construction or installations undertaken to improve the range, to facilitate management, or to control distribution and movement of livestock.

**ADDITIONAL AUTHORITIES:**

* Wilderness Act §4(d)(4) – Special Provision on Grazing
* 36 CFR 222 – Range Management
* 36 CFR 293.7 – Wilderness—Primitive Areas: Grazing of Livestock
* FSM 2323.2 – Wilderness Management: Management of Range

**PART A: GRAZING PERMITS[[1]](#footnote-1) IN WILDERNESS CHECKLIST**

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|  | **Review Questions** | **Check** |
| **Congressional Grazing Guidelines** | Has a copy of the Congressional Grazing Guidelines been incorporated into Part 3 of the Livestock Grazing Permit(s)? |  |
| **Motorized Equipment & Mechanical Transport** | Have motorized equipment[[2]](#footnote-2) uses existing in the area prior to its designation as wilderness or established by prior agreement been identified in the Livestock Grazing Permit(s)? |  |
| Are all occasional uses of motorized equipment expressly authorized in Part 3 of the Livestock Grazing Permit(s)? |  |
| Have the conditions associated with any authorized occasional use of motorized equipment been clearly articulated in Part 3 of the Livestock Grazing Permit (s) (e.g., the use of backhoes to maintain stock ponds, pickup trucks for major fence repairs, or specialized equipment to repair stock watering facilities)? |  |
| Is any authorized occasional use of motorized equipment based on a rule of practical necessity and reasonableness, developed in consultation with the permit holder(s) (i.e., practical alternatives do not exist; activities cannot be reasonably and practically accomplish on horseback or foot)? |  |
| Have the conditions associated with emergency use of motorized equipment, for purposes such as rescuing sick or injured animals, been clearly articulated in Part 3 of the Livestock Grazing Permit(s)? |  |
| **Structural Range Improvements** | Have structural range improvements existing in the area prior to its designation as wilderness been identified in the Livestock Grazing Permit(s)? |  |
| Do(es) the Livestock Grazing Permit(s) authorize maintenance of structural range improvements within the area? |  |
| Do(es) the Livestock Grazing Permit(s) authorize and specify that the replacement or reconstruction of deteriorated facilities or improvements utilize “natural materials” when their use would not impose unreasonable additional costs on the permit holder(s)? |  |
| Are criteria for determining “natural materials” identified in the Livestock Grazing Permit(s)? |  |
| Are criteria for determining “unreasonable additional costs” in consultation with the permit holder(s) identified in the Livestock Grazing Permit(s)? |  |
| Do(es) the Livestock Grazing Permit(s) authorize construction of new additional improvements or structures only when necessary to protect wilderness value (36 CFR 293.7)? |  |
| Do(es) the Livestock Grazing Permit(s) authorize removal of structural range improvements no longer necessary for resource protection?  |  |
| **Nonstructural Range Improvements** | Have non-structural range improvement practices used in the area prior to its designation as wilderness been identified in the Livestock Grazing Permit(s)? |  |
| Are all authorized non-structural range improvement practices identified in the Livestock Grazing Permit(s)? |  |
| Are all authorized non-structural range improvement practices (i.e. seeding, plant control, irrigation, fertilizing, prescribed fire) in the Livestock Grazing Permit(s) limited to where (FSM 2323.26(b)): 1. They were in use or agreed to prior to establishment of the wilderness; AND
2. Their continued use is necessary to maintain livestock grazing operations (FSM 2240)?
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| **Minimum Requirement Analysis** | Has a Minimum Requirements Analysis (MRA) been used to inform decisions regarding motorized use and range improvements, as appropriate? |  |
| **Wilderness Performance Measure Reporting**  | Have all grazing permits in the wilderness unit been reviewed? |  |
| Have wilderness-specific concerns, if any, been identified for each permit in the wilderness unit? |  |

**PART B: WILDERNESS AMP[[3]](#footnote-3) CHECKLIST[[4]](#footnote-4)**

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|  | **Review Questions** | **Check** |
| **AMP Review** **& Revision** | Has a wilderness staff point of contact been identified for development, review, and revision of the AMP? |  |
| Has a rangeland management staff point of contact been identified for development, review, and revision of wilderness management plans for areas that overlap livestock grazing allotments? |  |
| Does the AMP provide adequate information to: address multi-jurisdictional issues, identify coordination needs, and facilitate management to assure consistency? |  |
| Is the AMP reviewed and updated as necessary, in consultation with affected permit holders? |  |
| **Grazing** **& Wilderness Legislation/ Policy**  | Does the AMP specifically reference relevant provisions from enabling legislation, as well as agency policy direction for grazing in wilderness, including the Congressional Grazing Guidelines, 36 CFR 293.7, and FSM 2323.2? |  |
| **Grazing** **& Wilderness Management** | Does the AMP address specific wilderness resource concerns, such as: wilderness character, heritage, wildlife, fisheries, hydrology, soils, invasive species, TES, and unique features of the designated wilderness area? |  |
| Does the AMP address effects to wilderness character: natural quality, untrammeled quality, undeveloped quality, opportunities for solitude or primitive and unconfined recreation? |  |
| Does the AMP describe specific protection objectives for resources in wilderness? |  |
| **Terminology** | Has the criteria for determining what qualifies as “practical necessity,” “reasonableness,” “prior occurrence,” “prior agreement” and “unreasonable costs” been identified in the AMP, in consultation with the grazing permit holder(s)? |  |
| **Adjustments to Livestock Numbers** | Have adjustments in the numbers of livestock permitted to graze in wilderness been made in the AMP as a result of revisions to the normal grazing and land management planning and policy setting process, giving consideration to legal mandates, range condition, and the protection of the range resource from deterioration? |  |
| Has the rationale supporting any past or proposed changes in animal unit months (AUMs) from the level present at the time the area entered the wilderness system been disclosed in the AMP? |  |
| **Motorized Equipment & Mechanical Transport** | Have motorized equipment[[5]](#footnote-5) uses existing in the area prior to its designation as wilderness or established by prior agreement been identified in the AMP? |  |
| Has the occasional use of motorized equipment in the performance of maintenance or other required management actions been identified and authorized in the AMP, based on analysis of practical necessity, reasonableness, and that the use occurred prior to the area’s designation as wilderness or is established by prior agreement? |  |
| Is any authorized occasional use of motorized use in this AMP based on consideration and analysis of all practical alternatives, as well as a determination that such use would not have a significant adverse impact on the natural environment? |  |
| Does the AMP provide a process for determining need, reviewing, and approving requests to use motorized equipment, including differentiating between uses authorized prior to and after wilderness designation? |  |
| Does the AMP contain information on procedures for documenting and reporting authorizations (including for NRM-Wilderness Upward Reporting) to use motorized equipment in wilderness? |  |
| Does the AMP list the Regional Forester as responsible for approval of motorized equipment uses in designated wilderness (see FSM 2326.04(b)(4))?**Note:** Check local letters of delegation and FSM regional supplements for any allowable variations on delegated approval authority.  |  |
| Does the AMP identify a process and clearly articulate the conditions associated with authorizing the emergency use of motorized equipment, for purposes such as rescuing sick or injured animals? |  |
| **Structural Range Improvements** | Have structural range improvements existing in the area prior to its designation as wilderness been identified in the AMP? |  |
| Has the need for maintenance, reconstruction, replacement, construction or removal of structural range improvements within the area been identified in the AMP? |  |
| Does the AMP include a general review process and schedule for activities related to maintenance, reconstruction, replacement, construction and/or removal of range structural improvements within the area? |  |
| Did the NEPA analysis supporting the AMP include the following considerations regarding reconstruction or replacement of existing structural range improvements within the area:a) Examine whether the improvement is necessary for livestock grazing operations, resource protection, or protection of wilderness values, including the exploration of alternatives for meeting those needs?b) Consult with permit holder(s) to ensure that the design, location, and type of material needed is harmonized with natural features of the wilderness, and to determine reasonable costs for the permit holder(s) livestock grazing operation associated with the use of “natural materials”? c) Balance the particular wilderness values involved with the cost of material and labor? |  |
| Has the need for construction of new improvements for the purpose of resource protection and the more effective management of these resources, but not the increase of AUMs above the level present at the time of wilderness designation, been documented in the AMP? |  |
| **Nonstructural Range Improvements** | Have nonstructural range improvements and/or practices (i.e. seeding, plant control, irrigation, fertilizing, prescribed fire) existing in the area prior to its designation as wilderness been identified in the AMP? |  |
| Does the AMP address the need for maintenance of nonstructural range improvements and/or practices to maintain livestock grazing operations where they occurred before the designation of wilderness?  |  |
| Does the AMP include a general schedule for activities related to maintenance of nonstructural range improvements and/or practices within the area? |  |
| Is seeding only authorized for:1. Areas where human activities, including commercial livestock grazing, have caused the loss or threaten the existence of indigenous plant species;
2. Areas where human activities, including commercial livestock grazing, have denuded or caused loss of soil, providing that the actions or activities responsible for the deterioration no longer exist and that natural revegetation is insufficient or ineffective; OR
3. Maintenance of livestock grazing operations where seeding was practiced before the area was designated as wilderness?
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| Are only species that are indigenous or naturalized to the area used in seed mixtures? |  |
|  | Is plant control only authorized for:1. Indigenous plants when needed to maintain livestock grazing operations that were in effect before the area was designated as wilderness; OR
2. Noxious farm weeds by grubbing or with chemicals when they threaten lands outside wilderness or when they are spreading within the wilderness, provided that it is possible to effect control without causing serious adverse impacts on wilderness values?
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| Is fertilization (including liming) only authorized to aid revegetation of the areas that qualify for seeding or to maintain livestock grazing operations where practiced before the designation of wilderness? |  |
| Is irrigation water spreading only authorized to maintain livestock grazing operations and only where practice before the designation of wilderness? |  |
| Is ignited prescribed fire use only authorized where:1. It is necessary to maintain livestock grazing;
2. It was practiced before the designation of wilderness; AND
3. Lightning-caused prescribed fires does not meet the livestock management purpose (FSM 2324.2)?
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| **Minimum Requirement Analysis** | Has a Minimum Requirements Analysis (MRA) been used to inform decisions regarding motorized use and range improvements, as appropriate? |  |
| **Monitoring** | Has a monitoring plan been developed and implemented that addresses implementation, effectiveness, and other wilderness specific concerns associated with the AMP?  |  |
| **Spatial Information** | Do the AMP and/or associated NEPA documents include a spatial data and metadata record that can be referenced to help protect the wilderness and grazing resources? Such data may include:* Wilderness boundaries
* Grazing allotment boundaries
* Range improvements
* Trails, trailheads, associated recreation facilities, bridges, etc.
* Administrative sites and associated facilities
* Private inholdings
* Outfitter-Guide campsites
* Meadows
* Watershed information and stream conditions
* Dams and water diversions
* Management prescriptions
* Heritage sites and features
* Invasive species
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| **Wilderness Performance Measure Reporting** | Do all allotments in this wilderness have AMPs that incorporate appropriate items from this Wilderness Grazing Checklist? |  |
| Have individual allotments been assigned a priority for monitoring and management? |  |

1. Livestock Grazing Element, 2-Points: “The ‘Wilderness Grazing Checklist’ has been utilized to review all grazing permits in this wilderness, identify any wilderness-specific concerns and specify individual allotments of priority for monitoring and management.” [↑](#footnote-ref-1)
2. As used in this checklist, “motorized equipment” also includes “mechanical transport.” [↑](#footnote-ref-2)
3. The items in the AMP checklist could be addressed in an AMP or the appropriate NEPA document. [↑](#footnote-ref-3)
4. Livestock Grazing Element, 2-Point Checkbox: “All allotments in this wilderness have AMPs that incorporate the appropriate items from the “Wilderness Grazing Checklist.” [↑](#footnote-ref-4)
5. As used in this checklist, “motorized equipment” also includes “mechanical transport.” [↑](#footnote-ref-5)