

Advocating for BLM Landscapes

The Bureau of Land Management has many tools at its disposal to protect wilderness, wildlife, cultural, recreation, and other values on public lands. The most important time for the public to advocate for special management of these values is in the land use planning process, which is when the BLM makes long-term management decisions for lands and resources. Submitting proposals and building a coalition of support early in the process is key for effective advocacy.

Protecting Wilderness-quality Lands

➤ Lands with Wilderness Characteristics

Lands with wilderness characteristics (LWC) are one of the resources of the public lands that must be inventoried and considered under the Federal Land Policy and Management Act (FLPMA).¹ BLM Manuals 6310 and 6320 set out the BLM's approach to identifying and protecting wilderness characteristics on the public lands. This guidance recognizes that wilderness is a resource that is part of BLM's multiple use mission, requires the BLM to keep a current inventory of wilderness characteristics, and directs the agency to consider protection of these values in land use planning decisions.

[Manual 6310](#) sets out the process and factors for evaluating lands to determine if they have wilderness characteristics. The BLM is required to update its LWC inventory when undertaking a land use planning process; when BLM has new information about wilderness resources, including information provided by the public; and when analyzing a project that may impact wilderness characteristics. [Manual 6320](#) provides specific guidance on how the BLM will consider lands with wilderness characteristics in the land use planning process, including managing LWC to protect wilderness characteristics.

It's never too early to submit wilderness inventory information to the BLM. Providing citizen inventories in advance of a planning or NEPA process can be the best way to ensure the field staff have time to review and respond to this information before making decisions that can impact wilderness-quality lands.

➤ Wilderness Study Areas

Wilderness Study Areas (WSAs) are the BLM's most durable and important administrative designation to maintain wilderness character on certain high value public lands. In the land use planning process, the BLM can designate new WSAs under FLPMA section 202.

[Information Bulletin 2025-008](#) directs the BLM to consider management of lands that the

¹ 43 U.S.C. § 1711(a); see also *Ore. Natural Desert Ass'n v. BLM*, 625 F.3d 1092, 1122 (9th Cir. 2008).

agency has identified as having wilderness characteristics as WSAs when preparing land use plan revisions or amendments among the alternatives for managing lands with wilderness characteristics. The BLM recently designated new WSAs in the 2024 [Colorado River Valley Resource Management Plan](#) Record of Decision, the 2025 [Lakeview Resource Management Plan](#) Record of Decision, and the 2024 [Northwest California Integrated Resources Management Plan](#) (NCIP) Record of Decision.

Conserving and Restoring Wildlife Habitat

FLPMA includes a congressional declaration of policy that “the public lands be managed in a manner that will ...provide food and habitat for fish and wildlife...”² In furtherance of this requirement, BLM [Manual 6500](#) directs the BLM to “manage habitat with emphasis on ecosystems to ensure self-sustaining populations and a natural abundance and diversity of wildlife, fish, and plant resources on the public lands” and to “ensure full consideration of the wildlife, fish, and special status species in land use plans and other BLM activities.” [BLM Manual 6840](#) contains further guidance specific to the proactive conservation and recovery of special status species.

The following specific tools can be used in land use planning to conserve wildlife habitat. Proposing ACECs can also be an important tool for conserving wildlife habitat, as discussed in the final section of this document.

➤ Habitat Connectivity

[Instruction Memorandum 2023-005, Change 1](#), sets forth the BLM’s overarching policy intent to ensure habitat connectivity, permeability and resilience is restored, maintained, improved, and/or conserved on public lands. The IM amends BLM Manual 6500 to add a policy requirement that the BLM will “manage existing fish and wildlife habitat with the goal of maintaining, improving, and/or conserving habitat connectivity and restoring degraded fish and wildlife habitat to provide for increased habitat connectivity.”

The IM directs the BLM to identify areas of habitat connectivity on BLM-managed lands, consistent with the agency’s resource inventory obligations under FLPMA, and analyze and address areas of habitat connectivity in land use plans. BLM may apply administrative designations to conserve habitat connectivity, such as a Backcountry Conservation Areas or Areas of Critical Environmental Concern, or identify other types of management allocations or prescriptions to support habitat connectivity.

² 43 U.S.C. § 1701(a)(8).

➤ Backcountry Conservation Areas

Backcountry Conservation Areas (BCAs) are an administrative tool intended to preserve generally intact, undeveloped public lands that contain priority habitats for recreationally-important fish and wildlife species. The BLM can designate BCAs in land use plans to conserve and restore large areas of important habitats and movement corridors and to provide for high-quality wildlife-dependent recreation in those areas.

Under current policy guidance, the BLM designates BCAs as a type of Recreation Management Area. [BLM Manual 8320](#) directs that BCAs can be designated where “existing or proposed opportunities for wildlife-dependent recreation are recognized for their unique value, importance, and/or distinctiveness; and are commensurately managed to protect and enhance fish and/or wildlife habitat.” BLM has recently designated BCAs in the [Four Rivers Resource Management Plan](#) (Idaho), [North Dakota Resource Management Plan](#), and [Eastern Colorado Resource Management Plan](#).

➤ Important Bird Areas

Important Bird Areas (IBAs) are areas identified and protected to maintain naturally occurring bird populations across the ranges of the species by protecting habitats and the ecosystems in which they occur. The IBA Program is a global initiative of BirdLife International, with Audubon being the BirdLife partner-designate for the United States. [Audubon has identified 2,758 IBAs](#) covering 417 million acres of public and private lands in the U.S. IBAs on BLM-managed lands can be proposed for protective management in the land use planning process, including nominating them as a type of ACEC. For example, the [Gunnison Gorge NCA Resource Management Plan](#) designated the Gunnison Sage-Grouse ACEC/IBA for the purpose of protecting the Gunnison sage-grouse and its habitat.

➤ Intact Landscapes

The Public Lands Rule formalized a tool for the BLM to identify and manage unfragmented wildlife habitat and movement corridors through the concept of intact landscapes. The rule recognized and clarified that landscape intactness is part of the resource inventory that should be maintained and considered in accordance with FLPMA, because intact landscapes play a central role in maintaining ecosystem resilience and healthy public lands. To ensure the BLM assesses and appropriately manages unfragmented areas of public lands for the benefit of wildlife and other resource values identified in FLPMA, the Public Lands Rule directs the BLM to maintain an inventory of landscape intactness as a resource value, identify intact landscapes in land use plans, and manage certain

landscapes to protect their intactness. The rule established that habitat connectivity and migration corridor data would inform identification and management of intact landscapes.

While the Public Lands Rule may not be implemented in the current administration, intact landscapes are an ecologically based concept that can and should inform the BLM's management of public lands to conserve important wildlife habitat and connectivity areas. Identifying unfragmented landscapes and managing certain lands to maintain intactness will help the BLM meet its obligations under FLPMA.

Advocating for Outdoor Recreation Opportunities

➤ Recreation Management Areas

FLPMA requires the BLM to manage the public lands in a manner that provides for outdoor recreation.³ The BLM implements this requirement in the land use planning process by designating Recreation Management Areas (RMAs), which are units of BLM-managed land where certain types of recreation are “recognized as a primary resource management consideration and specific management is required to protect the recreation opportunities.”⁴ Once viewed as areas that were designated for intensive use or heavily motorized recreation, RMAs have evolved to encompass a diversity of experiences including non-motorized, backcountry opportunities and can be a tool to facilitate conservation as well as recreation on our public lands.

In accordance with BLM's [Manual 8320](#) on Planning for Recreation and Visitor Services, RMAs can be designated as Special Recreation Management Areas (SRMAs), Extensive Recreation Management Areas (ERMAs), or Backcountry Conservation Areas (BCAs, as described above). Land use plans must establish objectives, management actions and allowable uses for each RMA. This tailored management setting allows for RMAs to address a variety of values for recreation activities, including designating RMAs to protect and enhance primarily non-motorized, backcountry recreation activities.

Proposing Areas of Critical Environmental Concern

FLPMA requires the BLM to “give priority to the designation and protection of areas of critical environmental concern” when developing and revising land use plans.⁵ ACECs are areas of BLM-administered lands where special management attention is needed to protect and prevent irreparable damage to important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes; or to protect life and

³ 43 U.S.C. § 1701(a)(8).

⁴ BLM Manual 8320.06(C)(3).

⁵ 43 U.S.C. § 1712(c).

provide safety from natural hazards. The public can nominate lands for ACEC designation in the land use planning process, which requires documenting the relevant and important values of the area and the need for special management attention.

BLM often designates ACECs to protect wildlife habitat, including specifically special status species habitat, cultural resources, and rare and unique values such as geologic features. The BLM can also designate Research Natural Areas (RNAs) as a type of ACEC for public lands having natural characteristics that are unusual or that are of scientific or other special interest.⁶

While the Public Lands Rule codified guidance for ACEC designation and management into BLM's regulations, the BLM is required by FLPMA to prioritize ACECs regardless of the status of the rule. BLM Manual 1613 provides guidance for evaluating and designating ACECs. [Instruction Memorandum 2023-013](#) also provides interim updates to the policy. It's important to submit ACEC nominations early in the land use planning process, and meeting with field office resource specialists to discuss ACEC nominations is recommended as they will be developing internal ACEC nominations during the land use planning process as well. In addition, ACEC nominations can be submitted outside of a planning process (for instance if an RMP is out of date and the BLM is not revising the RMP any time soon). The BLM can evaluate whether the resources in the nominated area meet the relevance and importance criteria, and need special management criteria, and if those criteria are met, then the BLM should put temporary protective management in place.

⁶ 43 CFR 8223. The Public Lands Rule specifically established regulations governing the designation of ACEC RNAs; however, the BLM previously designated ACEC RNAs under the authorities of FLPMA and the RNA regulations (43 CFR 8223) and can continue to do so regardless of the status of the Public Lands Rule.