

OREGON OUTBACK DARK SKY NETWORK

“Collaborating to celebrate and protect the Outback’s pristine starry nights”



MEMORANDUM

PREPARED FOR: Ashley Wilson, IDA IDSP Program Manager

Outback IDSS Nomination Steering Committee

Other Outback IDSS Project Stakeholders

PREPARED BY: Dawn J. Nilson, IDSS Nomination Project Manager

DATE: November 18, 2021

SUBJECT: **Strategy to Nominate a Landscape-scale “Oregon Outback International Dark-Sky Sanctuary” within Lake, Harney, and Malheur Counties, Oregon**

INTRODUCTION AND NOMINATION PURPOSE

Newspaper and social media headlines directing people to “the top ten” places to see a stunning, star-filled dark sky are becoming more familiar, in large part to a program developed by the International Dark-Sky Association (IDA) known as the [International Dark Sky Places \(IDSP\) Program](#). Founded in 2001, the IDSP Program encourages communities, parks and protected areas around the world to preserve and protect dark sites through responsible lighting policies and public education. All the media attention has piqued interest in Oregon where park rangers, non-profits, local residents, destination management officials, and businesses have rightfully noted that we have night skies in Oregon that are much darker than some of those out-of-state places being granted the IDA distinction of an IDSP. This is especially true in Southeastern Oregon where more than two years ago a broad range of stakeholders formed the Oregon Outback Dark Sky Network (ODSN). On November 5, 2021, the ODSN submitted a pre-application to IDA to nominate “The Oregon Outback International Dark Sky Sanctuary” (IDSS). The purpose of this memorandum is to describe the project’s background and the strategy that the ODSN has pursued to ensure an efficient, streamlined IDA nomination in Southeastern Oregon that cultivates collaborative partnerships, promotes community-appropriate recreation opportunities, respects public and private lands, and leverages the opportunity to create the largest international dark sky place in the world. The primary objective behind the strategy is to yield a more beneficial and equitable nomination within the remote Oregon Outback.

The area of Southeastern Oregon, successfully promoted by Travel Southern Oregon, Eastern Oregon Visitors Association and local chambers of commerce as “Oregon’s Outback,” covers most of Harney and Lake Counties, and portions of Klamath and Malheur Counties. The area that the ODSN is focused on is the tri-county area of Lake, Harney, and Malheur Counties, as shown within the blue line on Figure 1. The Outback refers to the remote, sparsely populated, mostly high desert basin and range area of

Oregon. Neighboring (or “gateway”) communities of the proposed IDSS include the Burns Paiute Tribe of the Burns Paiute Indian Colony of Oregon, Fort McDermitt Paiute-Shoshone Tribes of the Fort McDermitt Indian Reservation, Christmas Valley, Lakeview, Paisley, Burns, Hines, Ontario, Vale, Harper, and Jordan Valley. Wholly or partially within the proposed sanctuary boundaries are the unincorporated towns of Silver Lake, Summer Lake, Plush, Adel, Valley Falls, Riley, Narrows, New Princeton, Princeton, Fields, Crane, and Juntura.

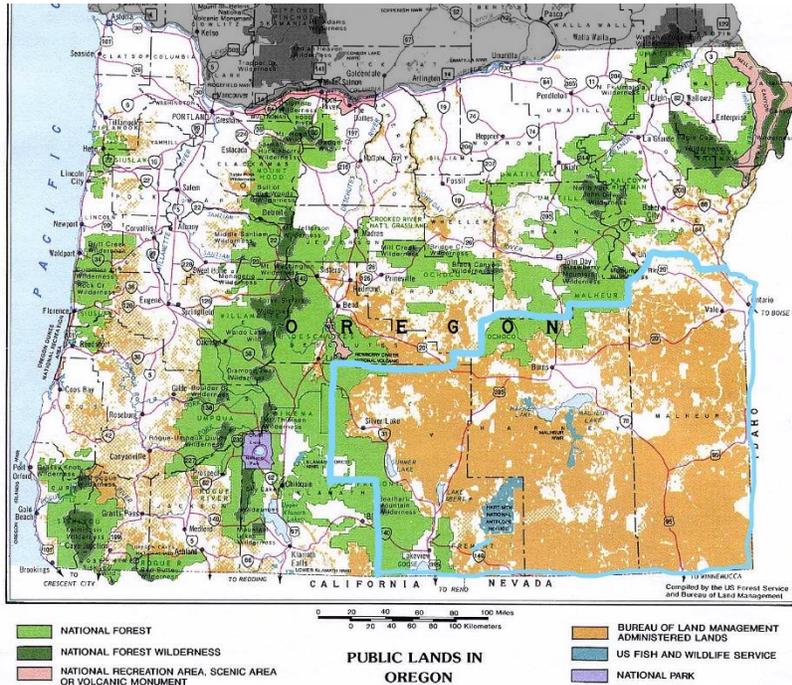


Figure 1. Lake, Harney and Malheur Counties, Oregon

an important migratory bird stop on the Pacific Flyway. The Outback hosts two U.S. Fish and Wildlife Service (USFWS) refuges, namely Hart Mountain National Antelope Refuge (NAR) in Lake County and the Malheur National Wildlife Refuge (NWR) in Harney County.

When you add world-class, high desert night skies to the special geological and biological features of the landscape, you have the recipe for a wonderful Oregon Outback International Dark Sky Sanctuary by day and by night. In the Outback one can see complex details of the Milky Way, a few star-making nebulae, and a galaxy 2.5 million light years away -- all readily visible to the naked eye.

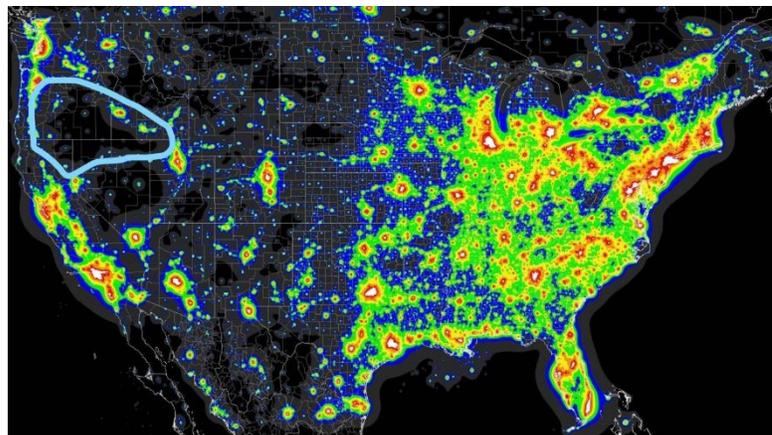


Figure 2. Artificial Night Sky Brightness of the United States. (Black areas are darkest).

By protecting the skies of the Outback, we sustain its legacy of stewardship of pristine starry nights that stretches from today’s ranching communities back to over 13,000 years with the first human residents.

Figures 2 and 3 show the level of night sky brightness in the United States and Oregon per the [New World Atlas of Artificial Sky Brightness](#). The Outback is within the largest, pristine dark sky zone in the continental United States (highlighted with a blue boundary marker). This pristine zone includes Southern and Central Oregon and extends into Idaho, Nevada, and California. This level of darkness corresponds to Bortle Class 1 skies -- the darkest of dark. (The Bortle Class scale ranges from 1 to 9 and measures sky quality relative to light pollution). Such exceptional skies are becoming rarer each year as light pollution increases throughout the world. A recent study estimates that light pollution has increased worldwide by at least 49% in the last 25 years (Miguel-Sanchez, et al, 2021). This only accounts for light visible via satellites. So, the true increase may be significantly higher – up to 270% globally, and even 400% in some regions.

Figure 2 illustrates how much of the United States east of the Mississippi is currently bathed in artificial light. According to the New World Atlas of Artificial Night Sky Brightness, 80% of Americans can’t see the Milky Way from their homes (Falchi, F. et al, 2016). (The atlas takes advantage of low-light imaging now available from the NOAA/NASA Suomi National Polar-orbiting Partnership satellite, and is calibrated by thousands of ground observations). Per the principal author of the atlas report, Fabio Falchi, a researcher at the Light Pollution Science and Technology Institute (ISTIL) in Thiene, Italy, *“We have lost the connection with our roots, of literature, of philosophy, of science, of religion—all are connected with the contemplation of the night sky. A new generation can no longer appreciate this beauty.”*

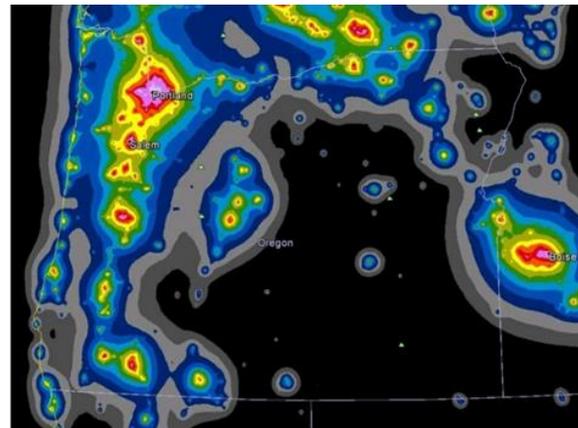


Figure 3. Artificial Night Sky Brightness of Oregon

In 2019 a wilderness study area (WSA) in northern Nevada near the Oregon border and within the same pristine dark sky zone was designated as the Massacre Rim International Dark Sky Sanctuary. A nomination of a much larger section of this zone in Oregon would afford added protection to this zone, or what could be called a “dark sky shed,” and create further awareness of light pollution throughout Oregon and the Pacific Northwest Region.

PROJECT HISTORY/BACKGROUND

In recognition of the Outback’s magnificent dark skies, various parties (e.g., Portland Audubon, Rose City Astronomers, Travel Southern Oregon, and independent public land advocates) began efforts towards nominating a dark sky place in various areas of the region as early as 2018. In September 2019 a memorandum (white paper) was written by Dawn J. Nilson, Dark Sky Preservation Director for Rose City

Astronomers, and the then Chair of IDA Oregon, to alternatively propose a collaborative effort to nominate a single-identity, region-wide, dark sky sanctuary on multiple public lands (with BLM and USFWS ownership) as a cohesive course of action to provide a streamlined, more beneficial dark sky nomination within the Oregon Outback. The strategic direction and concepts of such a nomination was discussed with IDA staff prior to and during the preparation of the white paper and drafts of the document were shared with IDA prior to its completion. Though such a sanctuary with multiple public land ownership had not been nominated for IDA consideration to date, IDA International Dark Sky Program staff of 2019 affirmed it to be an acceptable concept. IDA’s specific recommendation was to limit the number of separated units to three and to limit the space between them with the aim of creating a more contiguous sanctuary. ODSN was encouraged by IDA staff again in early 2021 to move forward with a sanctuary nomination.

In support of broad collaboration, in October 2019 several parties came together to form the Oregon Outback Dark Sky Network (ODSN). The ODSN was formed as a “*voluntary grass-roots initiative to build an alliance of communities, businesses, local governments, ranchers, state and federal agencies, tribes, and Oregon Outback night sky enthusiasts to support a set of shared principles resulting in mutual community benefits and the long-term conservation of our starry night heritage.*” Early ODSN partners included Travel Southern Oregon, the Lake County Chamber of Commerce, PLAYA at Summer Lake, Rose City Astronomers, IDA Oregon Chapter, the Lakeview Community Partnership, and a few independent dark sky advocates. The ODSN has focused its advocacy efforts in the very dark tri-county area of Lake, Harney, and Malheur Counties, as shown in Figure 4.

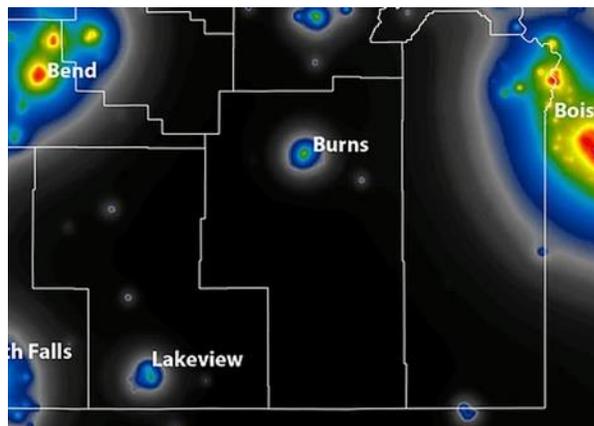


Figure 4. Artificial Night Sky Brightness of Lake, Harney, and Malheur Counties

The ODSN has held regularly scheduled call-in, then Zoom meetings since its formation. In March 2020 the ODSN held a stakeholder workshop in Lakeview, Oregon with the purpose of describing the nomination process, identifying possible IDSP boundaries, and teasing out stakeholder concerns, constraints, and opportunities relative to setting boundaries. Attendees included representatives from BLM, USFWS, and the U.S. Forest Service (USFS) – Fremont-Winema National Forest, Travel Southern Oregon, Rose City Astronomers, ranchers, local businesses, business organizations, and independent advocates from Lake County. Several attendees asked “why not nominate all of Lake County?” and that suggestion was explored.

It became clear at that March 2020 workshop that unlike the precedent set by the nearby Massacre Rim International Sanctuary and the Central Idaho International Dark Sky Reserve that nominated a BLM Wilderness Study Area and a USFS Wilderness Area (as the core of the reserve), respectively, federal land managers of the Outback did not want to focus attention on designated wilderness or prospective

wilderness given: 1) the community misunderstandings that might arise by focusing on those particular managed lands versus other public lands; 2) the concern that unsavvy visitors might create increased disturbances in those lands; and 3) the potential for more search and rescue operations from attracting night-time visitation. Several stakeholders stated their desire that a dark place boundary be designed in a way that provided economic opportunities to the communities without unwanted consequences. The ODSN has been moving forward in the nomination boundary-setting process by applying the recommendations provided by IDA staff and project stakeholders.

While continuing to grow the network and build support for a nomination project, at the start of 2021 the ODSN launched the Oregon Outback Sky Quality Monitoring Initiative (SQMI) to engage more of the general public through interactive outreach and to collect the necessary sky quality data for the IDA nomination. Travel Southern Oregon donated two Night Sky Adventure Kits for loan at the Lake County Library. This initiative caught on and Harney and Malheur County Libraries purchased kits for their libraries. These kits include a hand-held sky quality meter (SQM), planisphere, red flashlight, maps, and information on the Outback SQMI and the [Globe at Night](#) Program. As part of the initiative, Travel Southern Oregon and Rose City Astronomers donated three SQMs that collect data every 5 minutes in

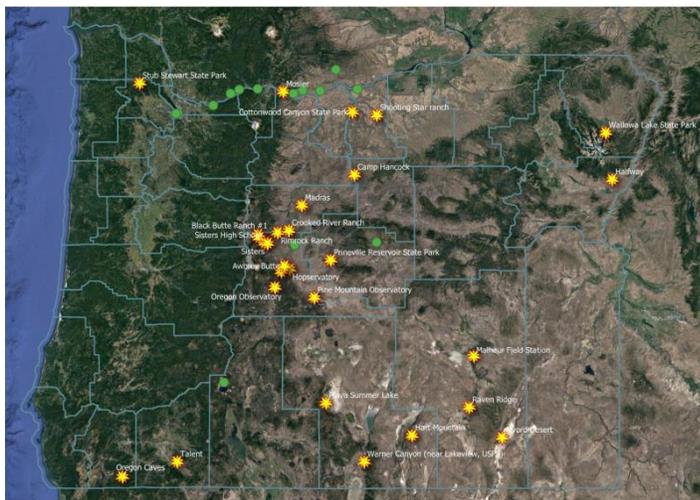


Figure 5. Oregon Skyglow Measurement Network. (Source: IDA Oregon, July 2021).

Lake County throughout each day. They are stationed at Hart Mountain NAR, Summit Prairie of the USFS, and PLAYA Summer Lake. Data from these three SQMs are now part of IDA Oregon’s statewide [Skyglow Measurement Network](#) (Figure 5) that also includes three mounted SQMs in Harney County. Friends of the Owyhee purchased a hand-held SQM to collect data in Malheur County, and they will soon be purchasing and installing an SQM in Malheur County close to the Boise skyglow area.

In addition to the outreach efforts through the SQMI, the ODSN has developed a Facebook page, organized local film screenings of *Saving the Dark*, and hosted stakeholder workshops. ODSN members and affiliates have also organized a few star parties over the last few years in Lake and Harney County at sites accessible from main roads (including downtown Lakeview), hosted a dark sky program at PLAYA Summer Lake, produce monthly stargazing webinars over Zoom, and are seeking grants for more dark sky programming.

With ODSN membership broadening in Harney and Malheur Counties and with more people supporting and participating in a dark sky place nomination in the Outback, the ODSN recently established an Outback IDSS Nomination Steering Committee comprised of committed, local stakeholders to guide the efforts necessary to prepare the nomination.

OVERALL STRATEGIC APPROACH

Instead of a piecemeal approach nominating International Dark Sky Places one by one within the Southern Oregon portion of the large, pristine, dark sky zone (Figure 3) and thus potentially instigating adverse, competing economic interests, exhausting limited human resources, and requiring unnecessary redundancy, the proposal is to nominate a single “identity based,” landscape-scale dark sky place – The Oregon Outback International Dark Sky Sanctuary – within Lake, Harney, and Malheur Counties. While almost all certified dark sky sanctuaries and parks include one landowner within one jurisdiction with readily defined boundaries and usually built-in interpretive programming, our strategy is to combine multiple public lands within three counties with multiple landowners and a few unincorporated towns into one, large, contiguous boundary. As one of the federal land managers said at a recent stakeholder workshop, *“A larger sanctuary makes sense because it disperses visitor population.”* Another stakeholder stated, *“There are more options of where people can safely go if two or more counties are involved.”* Another way to describe the preference for a large-scale sanctuary is *“Residents and visitors have more options of where to recreate and still be at the sanctuary.”*

There are no national parks within the tri-county area (and only one national park in the entire state) to nominate. If there were, this nomination would be much easier. Within the tri-county area the Oregon Parks and Recreation Department (OPRD) owns and manages a few remote sites, including one “natural area,” one “wayside,” one “scenic corridor,” two “recreation areas,” two “historic heritage sites,” and one “state park.” Except for Lake Owyhee State Park in Malheur County near Vale, Oregon (close to the skyglow created from the Boise, Idaho metro area), these sites are fairly small. A stand-alone dark sky place nomination at one of these OPRD sites would not exemplify the extent of dark skies in the Outback or bring much awareness to the dark sky movement. It would also not do much economically for the Outback. Therefore, the ODSN has strived to propose boundaries for a landscape-scale sanctuary that are similar to the boundaries of a national park.

By nominating a national park-like, landscape-scale boundary in the Outback, wild areas in the Outback (like BLM wilderness areas and wilderness study areas, USFWS refuges, and the Summer Lake Wildlife Area) would not bear the bulk of dark sky sanctuary visitors. Instead, like national parks, the bulk of visitors would be guided to places more on “the beaten path.” National parks encompass a large land area with a mix of sites that address the needs of a variety of outdoor recreationists – from novice to expert -- and a mix of land from wild to somewhat developed. The majority of land within a national park is akin to wilderness and thus it experiences few users. The minority of land of such parks is used

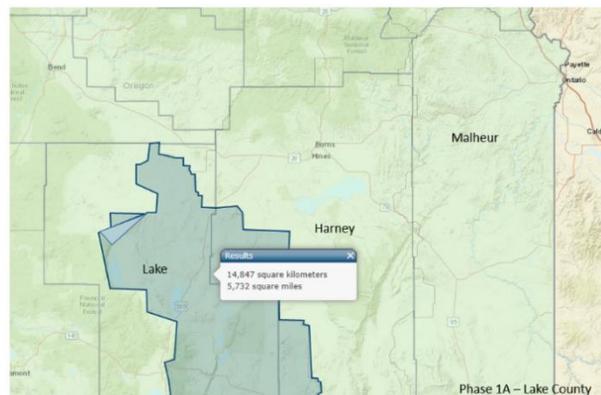


Figure 6. Phase 1A - Lake County with Harney County extensions. (Boundaries are not illustrated precisely and are for approximate size purposes only).

by the majority of visitors. Such parks strategically direct the average recreationist to sites with amenities such as parking, water, trail heads, paved roads, and readily accessible overnight accommodations. The wild areas of the park have either few trails and roads or no trails and roads. Areas with trails and unpaved roads are for the serious backpacker and ORV operator, respectively. The ODSN has crafted an Outback IDSS boundary with a similar strategy to a national park.

The nomination would most likely be in phases, with Phase 1A (at 3.67 million acres) including Lake County lands and lands within Harney County that are included in the BLM Lakeview District boundaries (Figure 6). This initial nomination is planned for late spring 2022. The reason for the phasing is to give other areas in the Outback more time to catch up with gathering additional community support and sky quality monitoring. Depending on a few circumstances yet to be resolved, it may be possible that the initial nomination will include the approximate area of Phase 1B (Figure 7) that includes more of Harney County. If Phase 1B is not realized this coming spring, an amendment for an expanded sanctuary would be expected relatively soon after and likely include what is described as Phase 2. Phase 2 (Figure 8) within Malheur County would also likely follow the Lake County nomination as a sanctuary extension amendment. A committed group of advocates in Malheur County has only recently become engaged with the nomination and a bit more work is needed before Phase 2 is ripe. This phased approach has been discussed with three IDA staff who have held the title of IDSP Program Manager. Advocates within all three counties are currently engaged with lighting inventories, sky quality monitoring, and public



Figure 7. Phase 1B - Lake and Harney Counties. (Boundaries are not illustrated precisely and are for approx. size purposes only).

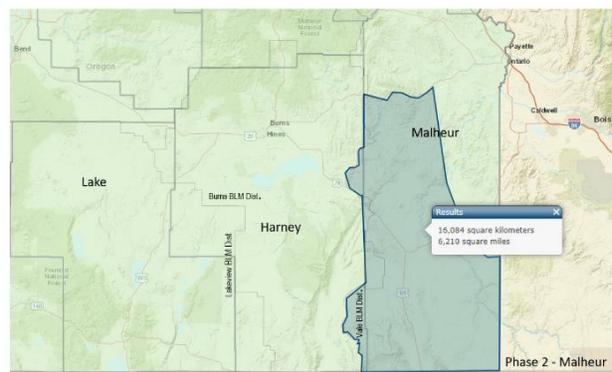


Figure 8. Phase 2 - Malheur County Extension. (Boundaries are not illustrated precisely and are for approx. size purposes only).

outreach. With the momentum that we've seen lately, it may be possible that the nomination includes all three counties and no amendment will be needed.

Figure 9 presents the approximate, ultimate boundary of the sanctuary, recently updated to include about 11 million acres. Figures 7 through 9 illustrate county and BLM District lines. From west

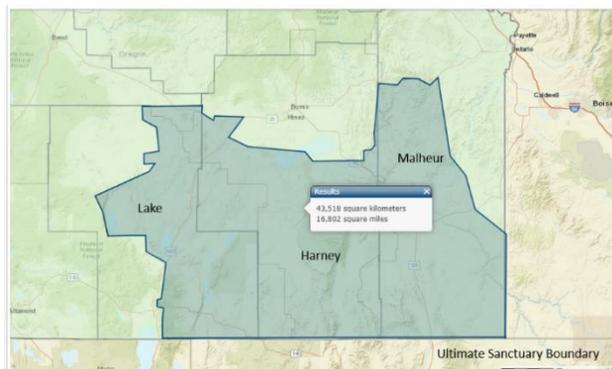


Figure 9. Ultimate Sanctuary Boundary

to east, BLM Districts include Lakeview, Burns, and Vale. Areas west of the western boundary and north of the northern boundary include the Fremont-Winema, Deschutes, and Malheur National Forests. A unit of the Fremont-Winema National Forest east of the City of Lakeview (the Warner Unit) is included in the proposed boundary.

ALTERNATIVES ANALYSIS/BOUNDARY GUIDELINES

Though we are proposing a sanctuary with an area multiple times greater than any other sanctuary nominated to date, a “sanctuary” in the Outback is being proposed instead of a “reserve.” Per the IDA, *“A sanctuary differs from a Dark Sky Park or Reserve in that it is typically situated in a very remote location with few (if any) nearby threats to the quality of its dark night skies and it does not otherwise meet the requirements for designation as a park or reserve. The typical geographic isolation of Dark Sky Sanctuaries significantly limits opportunities for public outreach, so a sanctuary designation is specifically designed to increase awareness of these fragile sites and promote their long-term conservation.”* This definition conforms to the Outback to a “T.” While there has been discussion among the ODSN and among IDA staff in the past of whether the Outback was more fitting of a reserve given its sheer size, it’s clear that a sanctuary is entirely befitting of the conditions and circumstances of the Outback and that a reserve is not an appropriate classification.

Reserves have dark “core” areas that are protected by a less dark buffer that includes nearby communities that threaten the quality of the core. Any selection of a core in the Outback would be arbitrary since the vast region is mostly Bortle 1 Class skies. Sanctuaries require a higher standard of darkness than reserves (i.e., 21.5 mag/arcsecond squared for sanctuaries vs. 21.2 for reserve cores). The level of natural darkness within most of the Outback is as pristine as possible at 21.99-22.00+ mag/arcsecond².

Alternative boundaries for the Outback IDSS were presented for consideration at three stakeholder focus group workshops on October 25 and 26, 2021. Focus

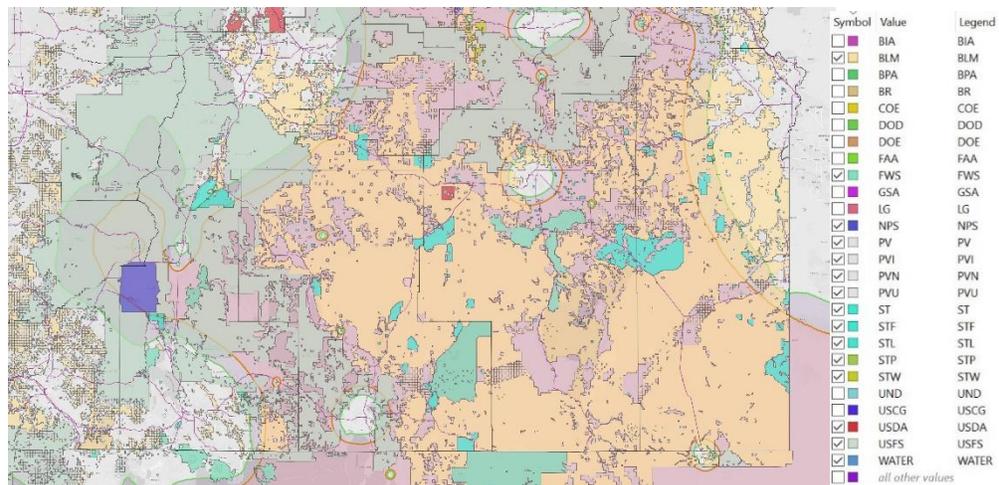


Figure 10. Land Ownership with the Outback

groups included landowners/land managers, government officials, and all other stakeholders. Stakeholders were shown a variety of mapping used to prepare the suite of alternatives (e.g., land ownership [Figure 10], VIIRS satellite night radiance [Figure 11], geographic, transportation, and political maps) so they could refer back to the maps for any suggested boundary revisions. Stakeholders were

asked to review each alternative through the lens of a SWOT analysis (i.e., Strengths, Weaknesses, Opportunities, and Threats). Alternatives boundaries ranged from each county having the most practical boundary for their county or all the counties working together to phase into one, large, contiguous

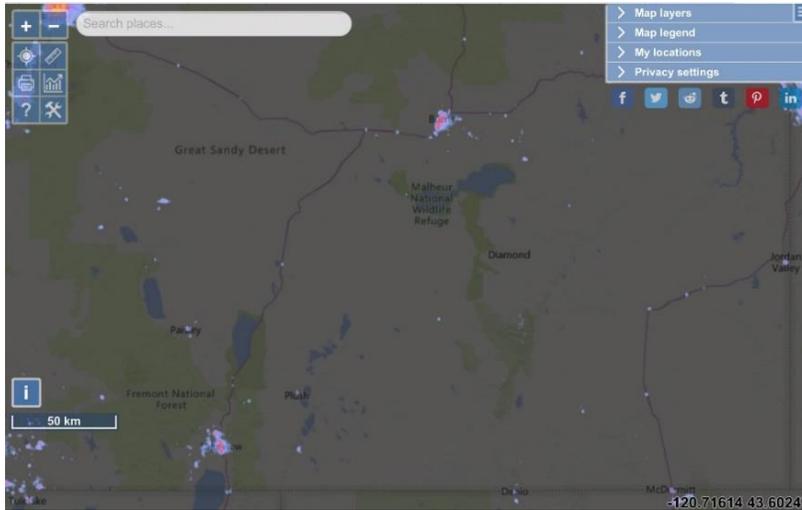


Figure 11. VIIRS Satellite Image Showing Night Radiance throughout the Outback

sanctuary. (When considering boundaries, “practical” refers to involving the least number of land owners and jurisdictions while attaining the largest sanctuary area possible).

All the stakeholders attending those meetings were in support of the collaborative, phased-approach and all were in general consensus with the guidelines for setting boundaries and the preliminary boundaries that were

shown in the maps (i.e., the “Orange Line” was preferred). Alternatives were named the Red Line, Red Line with Extensions, Purple Line, Purple Line with Extensions, Green Line, Sapphire Blue Line, and Orange Line, all based on the color of the boundary line presented in the maps. The alternatives and the results of the stakeholder workshops were presented to the Steering Committee on October 29, 2021. Committee members were also supportive of the collaborative, phased-approach, suggested boundary guidelines, and recommended boundaries shown. While some further boundary “tweaking” is ongoing, a Pre-application for Nomination was filed with the IDA on November 5, 2021 based on the clear consensus of the community.

The adopted boundary strategy includes the following guidelines:

- Focus on a “Basin and Range” site identity. (Fewer trees emphasize greater stargazing).
- Where possible, avoid areas with numerous private properties and/or large lot private inholdings within public lands.
- Focus on contiguous public lands.
- Include private lands only when they are “islands” within a sea of public lands or make practical sense when approximate to boundary roads.
- Focus on areas with Bortle 1 and 2 Class skies (i.e., pristine skies with SQM measurements of 21.89+ magnitude per arcsecond squared [mag/arcsecond²]). (Setting a more pristine threshold further creates a notable identity for the Outback).
- Include Bortle 3 and 4 skies (no brighter than 21.5) only if they are unincorporated towns or outdoor recreation facilities (e.g., ski resort) within the sea of public lands.
- Focus on areas where there are agreeable land managers/owners.

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- Create boundaries using known, recognizable, established boundary features, such as county lines, BLM district lines, mapped roads, national forest lines, and World Atlas of Sky Brightness blue zones.
 - Focus on areas where there are active and engaged dark sky advocates.

Though the area within the proposed sanctuary boundary is large and under the ownership and management of multiple parties, parties understand that a Lighting Management Plan (LMP) will need to be prepared jointly among them and that process is starting shortly. It's expected that the multiple parties would enter into a Memorandum of Understanding (MOU) to adopt the LMP. This large-scale sanctuary would also include a single outreach plan.

POTENTIAL BENEFITS FOR OUTBACK COMMUNITIES AND BEYOND

Economic Boost. The Oregon Coast provides an excellent example of how communities within a vast region went from spending resources focused at attracting tourists to their individual communities with little success to working together as a region to stimulate a thriving tourist industry for all communities. Travel Oregon, Travel Southern Oregon, and Eastern Oregon Visitors Association have the expertise and are supporting a similar venture in an Oregon Outback Dark Sky Sanctuary. Their marketing efforts are focused on community-appropriate, dark sky recreation.

Certification of a region-wide IDSS would further brand the "Oregon Outback" making it easier for tourism entities, the counties, tribes, and local communities to market eco- and astrotourism to the area, where desired. Dark sky place recognition affords the opportunity for communities near the sanctuary to identify themselves as "a gateway to the Oregon Outback Dark Sky Sanctuary" or "home to world-class dark skies." As a city official said in one of the stakeholder workshops, *"Bigger is better to bring attention to gateway communities. More towns share in the benefit."*

Based on economic analyses conducted in the Colorado Plateau where the highest concentration of dark sky places exists, tourist revenue in the Outback would be expected to increase up to three-fold via promotion of an additional natural feature to the Outback's existing cadre of promoted natural features. An awareness of dark skies entices people to stay the night, and once they do, they usually spend three times as much in the local area. An IDA certification could extend the tourist season, increase activity at local lodging operations, provide new or improved opportunities for local tour outfitters and operators, and increase business at restaurants, outdoor supply and grocery stores.

Increase Dark Sky Awareness. An enormous, certified dark sky place in the Pacific Northwest would bring warranted attention to the issue of light pollution across the entire region, thereby instigating large, light-polluting cities to adopt better outdoor lighting policies. After all, it's the light pollution from these larger cities that is now brimming over into rural communities.

While businesses and local residents of the gateway cities would not be required to conform to the Lighting Management Plan for the sanctuary, it's likely that the proximity of the sanctuary would inspire

them to be more dark sky friendly, just as towns near astronomical observatories have been inspired to be voluntarily dark sky friendly. Outreach across the entire Outback, at a time when many people and towns are starting to replace older lighting for new, energy-efficient lighting, would help local residents make dark sky friendly lighting choices and preserve pristine skies.

With time, gateway communities like Paisley, with only about 25 street lights, may choose to nominate their community as an International Dark Sky Community. With dark sky certification there are usually more grant opportunities for lighting retrofits. Additionally, with a large dark sky place, there is a greater possibility of local communities allying with electric companies to help owners make better lighting decisions when retrofits are due.

Preserve Cultural Heritage. The night sky is woven into the fabric of every culture across the globe. This is particularly true for the indigenous people of the Americas where the sky is as much a part of their heritage as is the land. Archaeological studies within the area indicate that people may have inhabited the Outback at least 13,000 years. For generations upon generations the Native Americans in the region (i.e., bands of the Northern Paiute and Shoshone) have interwoven their lives with sky lore. Stories of [how Na-gah became the North Star](#) and how other mountain sheep became the Big Dipper and Little Dipper are popular among the Paiute. The Shoshone tell of how the grey grizzly Wakinu created "[The White Trail in the Sky](#)." In the Outback's more recent ranching history, folks have told "cowboy stories" by the fire under a starry sky. A dark sky sanctuary within an area with a rich, dark sky legacy will help to preserve these traditions for future generations.

CONCLUSION

A landscape-level International Dark Sky Sanctuary nomination in the Oregon Outback would benefit the region environmentally, recreationally, economically, and culturally. Given its vast size it would generate dark sky awareness throughout the Pacific Northwest Region and perhaps beyond. The ultimate sanctuary scenario of a large portion of land within three counties would be triple the size of the current largest International Dark Sky Place in the world, Death Valley National Park. Even if the nomination were to stop at Phase 1A, it would still be the largest IDSP world-wide and would be more than three times larger than the current largest IDSS. This affords an exciting opportunity among Southeastern Oregon community members, business leaders, and statewide dark sky advocates.

As there are numerous components required for an IDA nomination application, a phased approach that provides for broadened partnerships and community support at the grass-roots level is a practical means to achieve the greater vision – and most importantly – to sustain it. This memorandum was prepared to describe the nomination strategy, to invite feedback, and to further cultivate partnerships to actualize an IDSS in one of the most pristine and deserving places in the United States.

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