October 3, 2025

To: Blue Mountains Forest Plan Revision Team
c/o Forest Supervisors for the Malheur, Umatilla, and Wallowa-Whitman National Forests

Malheur NF	Umatilla NF	Wallowa-Whitman NF
Forest Supervisor	Forest Supervisor	Forest Supervisor
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Subject: TRCP comments on the Blue Mountains National Forests Preliminary Need to Change and Preliminary Draft Proposed Plan

Dear Supervisors Watrud, McKinney, and Niesen,

The Theodore Roosevelt Conservation Partnership (TRCP) is a hunting and fishing conservation organization working to guarantee all Americans quality places to hunt and fish. We work with 64 formal partners and represent over 145,000 individual members nationally, including more than 4,200 throughout Oregon. The conservation of fish and wildlife habitat and public access for outdoor recreation on our public lands are of great interest to us and our members. We appreciate the opportunity to comment on the Blue Mountains Forest Plan revision.

We are pleased that the 1990 Blue Mountain's National Forest land-use plans are being updated to address modern challenges and update management for multiple uses, including recreation and hunting access and the conservation of wildlife habitat. New information and best available science on wildlife migrations, elk habitat, and cold-water fisheries have been published since the existing plans were developed. We request that the agency incorporate this science in the forthcoming EIS and include forest plan components that will conserve and enhance these habitats for decades to come. As stated in the Preliminary Need to Change, the 1990 plans did not consider the influence of disturbance regimes and ecological stressors such as drought, insect and disease, wildland fire, and invasive species and there is a need to incorporate management strategies that will promote landscape and habitat conditions that are resilient to future ecological stressors.

The TRCP has been engaged in the Blue Mountains plan revision since the last planning effort, which culminated in a near-final plan in 2019. That plan recognized elk security as a central management need, guided by the best available science from the Forest Service's Starkey Experimental Forest and ODFW biologists, and included standards and guidelines to conserve and manage habitat accordingly.

The TRCP appreciates the opportunity to comment on the Forest Service's stated purpose and need for this revision, which is to address the Preliminary Need to Change, reflect changed social, economic, and

ecological conditions since the 1990 plans, and incorporate best available scientific information under the 2012 Planning Rule. Our comments on the Preliminary Need to Change and Preliminary Draft Proposed Land Management Plan are primarily focused on the importance of the final plan including plan components that provide security for elk, manage for big game migration and connectivity, and support robust hunting and fishing opportunities.

Elk Security and Habitat

The TRCP recommends that the draft EIS analyze the best available science on elk security and include plan components to meet this need. Notably, the final Desired Condition Statement on Access developed by the Blue Mountains Intergovernmental Council (BIC) in January 2022 acknowledged that roads and trails can have a negative impact on elk distribution and use across the forest if not managed carefully.

> *"Forest road and trail system use, density and habitat conditions may have some negative effects on wildlife in general and specifically on elk distribution. Access and habitat considerations require analysis of both site-specific and landscape level needs and issues."*

The BIC final Desired Conditions on Access also included a statement supporting the need for a forest plan that carefully manages and maintains elk habitat, roads, and trails in a manner that provides for elk security and a broad distribution of elk use based on seasonal habitat needs.

> *"Elk Security: Forest habitats, trails, and road systems are managed and maintained in a manner that supports and enables broad distribution of elk populations based on their seasonal habitat needs. The desired condition is that habitat is managed to provide a balance of adequate nutritional resources, cover, and human disturbance regimes that encourage elk to remain on public lands. Collaboration and coordination occur that benefits these desired future conditions by addressing the many other factors such as predation, hunting, and private land practices that also effect elk distribution while providing year-round recreational and cultural opportunities and limiting agricultural damage on private lands."*

Importantly, the Preliminary Draft Proposed Plan does not carry forward the science-based provisions from the near finalized 2019 plans nor does this preliminary draft incorporate desired conditions or other important plan components for elk security, enhanced forage resources by completing active management projects, or other seasonal habitat needs. The BIC and many other stakeholders, including the TRCP, recognized the value of elk habitat on this forest, therefore, we recommend the draft plans incorporate specific standards, guidelines, and desired conditions to maintain and enhance one of the largest elk herds in the country.

Finally, while route designations will be addressed in future travel management planning, these Final Plans should still establish enforceable standards for wildlife habitat outcomes consistent with direction provided in the 2012 Planning Rule.

Socioeconomic Value of Hunting and Fishing

Hunting and fishing are central to the culture, economy, and identity of the Blue Mountains region. The Blue Mountain Forest Plan Assessment Report notes that hunting is the most popular recreational

activity on these forests, yet the Preliminary Draft Proposed Plan gives little recognition to its economic, cultural, and social importance.

We recommend the Final Plans explicitly recognize hunting and fishing as major economic drivers and cultural values in the section on Social and Economic Sustainability, Chapter 2 given the role hunting and fishing plays in sustaining rural communities and Tribal traditions. By more fully reflecting the socioeconomic value of hunting and fishing, the plan will align with the values of neighboring communities who depend on and invest in the health of these forests, in part, because of the economic benefits they generate.

Manage for Big Game Migration and Connectivity

The 2012 Forest Planning Rule directs the agency to maintain ecological integrity, connectivity, and viable populations of wildlife, and to consider the cultural, recreational, and economic importance of species used by the public. GPS collar data from more than 1,000 mule deer and elk demonstrate that the Blue Mountains' national forests provide critical summer ranges and migration corridors, with some herds traveling more than 60 miles between seasonal habitats. Because migration routes rarely change, the Forest Service should use this data to guide active management and habitat restoration projects, address barriers such as roads and fences, and ensure wildlife can build the fat reserves needed for winter survival and reproduction.

To meet these requirements, we recommend that the Final Plans establish Wildlife Habitat Management Areas based on GPS data to conserve high-priority corridors and winter ranges. These areas should be developed in close collaboration with Tribes, state and federal agencies, and local governments to ensure alignment with the best available science. The plans should also prioritize land acquisitions and active management projects that improve habitat connectivity, enhance forage quality, and restore summer and winter range conditions. Finally, TRCP urges the adoption of route density standards in key habitat areas, modeled after successful examples in other national forests, to maintain habitat function while allowing for sustainable recreation.

By grounding forest plan components in migration science and coordinating with partners, the Forest Service can conserve the Blue Mountains' world-class wildlife habitats while sustaining local communities, recreation, and cultural traditions.

In addition to these priorities, please accept the below detailed technical comments and recommendations.

Manage for elk habitat and elk security at the plan level

Across the Blue Mountains, forage improvements and active management projects are most effective for keeping elk on public lands when there is sufficient refuge from frequent human disturbance. Open road densities have been shown to impact nutritional resources on elk summer range and elk also select areas away from motorized routes. Poor security can lead to a decrease in hunter opportunity and the inability of wildlife managers to meet sex and age structure objectives in elk herds. Based on known observed displacement distances for elk from motorized and non- motorized routes from Starkey, security patches should be greater than 1,000 meters from the nearest motorized route and greater

than 660 meters from the nearest non-motorized route (excluding administrative access only routes). While cover (tree, shrubs, topography) is still an important habitat consideration for elk, best available science indicates the proximity of open motor vehicle routes (Rowland et al. 2004[1]) and the quality, quantity, and availability of forage are key determinates of habitat suitability (Cook et al. 1998[2])

Current 1990 forest plans also have standards requiring the use of the Elk Habitat Effectiveness Index (HEI) (Thomas et al. 1988[3]). The HEI index and other elk standards emphasizing dense tree cover are considered outdated science. Desired elk habitat conditions in current forest plans were not well expressed in relation to the landscape's ecological potential, and the difficulty of meeting the standards for elk has resulted in multiple plan amendments.

Two complementary syntheses from the Starkey team are instructive for plan-level standards:

- Science Update 13 (PNW Research Station): this document summarizes elk responses to roads, trails, and human use, finding that avoidance increases with use and that managing motorized access is a primary tool available to land managers.
- Rowland et al. 2004 reviews road effects on elk across the Pacific Northwest and concludes that reducing open-road density and creating roadless or effectively closed areas improves elk security and habitat effectiveness.

These findings align with the long-standing Hillis et al. 1991 study[4] which is often cited in USFS planning documents to define effective security by ensuring that blocks of hiding cover and forage are available in patches of adequate size, at adequate distances from open motorized routes, during the seasons when disturbance would otherwise push elk away.

We recommend the Final Plans include a simple, measurable forest-wide standard for elk security that any project can implement and the public can understand. Recommended language for a specific standard and objective is included below.

<u>Proposed forest-wide standard (elk security):</u>

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[1] Rowland, M.M., Wisdom, M.J., Johnson, B.K., Penninger, M.A., 2004. Effects of roads on elk: implications for management in forested ecosystems. Trans. N. Amer. Wildl. Nat. Res. Conf. 69, 491–508.

[2] John G. Cook, Bruce K. Johnson, Rachel C. Cook, Robert A. Riggs, Tim DelCurto, Larry D. Bryant, and Larry L. Irwin, *Effects of Summer-Autumn Nutrition and Parturition Date on Reproduction and Survival of Elk*, *Wildlife Monographs*, no. 141 (1998): 3–61.

[3] Thomas, J.W., Leckenby, D.A., Henjum, M., Pedersen, R.J., Bryant, L.D., 1988. Habitat effectiveness index for elk on Blue Mountain winter ranges. U.S. Forest Service Pacific Northwest Research Station Gen. Tech. Rep. PNW-GTR-218, Portland, OR, USA.

[4] Hillis, J., M. Thompson, J. Canfield, L. Lyon, C. Marcum, P. Dolan, and D. McCleerey. 1991. Defining elk security: the Hillis paradigm. Pages 38–43 in A. Christensen, L. Lyon, and T. Lonner, editors. Proceedings of a Symposium on Elk Vulnerability. Bozeman, Montana, USA

> Maintain or achieve at least 30 percent effective elk security within each HUC12 sub-watershed. Security is provided in contiguous patches of at least 250 acres located 0.5 mile or more from open public motorized routes, with seasonal application across known calving, summer, fall, and winter ranges. Where current conditions fall short, set interim objectives and timelines to reach the standard, prioritizing sub-watersheds with the lowest security.

This standard mirrors tested approaches in the Hillis framework and Starkey findings on route proximity, patch size, and seasonal vulnerability. It is also fully consistent with the 2012 Planning Rule, which requires plan components that maintain or restore ecological integrity and habitat for species used by the public for hunting, and directs consideration of connectivity and disturbance regimes.

The plan should add time-bound objectives that phase in security gains where they are most needed. For example:

- Within 7 years of plan approval, improve elk security to within the 30–100 percent desired range across at least 50 percent of priority sub-watersheds, then expand to additional sub-watersheds over time.
- Within 3 years of plan approval, complete a public-facing map of current elk-security patches and status by sub-watershed, updated biennially with monitoring results.

These are within the scope of the Preliminary Draft Proposed Plan's emphasis on desired conditions and starting-point objectives and the timing recommendations mirror those found in the 2019 plans revision language.

Ensure habitat gains are usable

Starkey and subsequent syntheses indicate that thinning, prescribed fire, and fuels work can increase nutritional carrying capacity, but elk will not utilize that improved habitat and forage to the maximum extent if security is lacking. Coupling careful management strategies for both access and habitat improvement projects during the design phase can ensure the best outcomes for elk use and distribution.

<u>Proposed forest-wide desired condition (forage-security linkage)</u>

> For projects that increase forage and improve habitat for elk or other big game, consider access measures that meet the elk-security standard in the affected sub-watersheds in the same decision window. Measures may include seasonal closures, route storage, and decommissioning of redundant routes.

<u>Proposed guideline (seasonal timing)</u>

> Avoid new disturbance in mapped calving areas during the peak period identified by state and tribal biologists; use time-limited area closures or route closures rather than dispersing pressure across a larger footprint.

This pairing ensures that habitat investments translate into elk distribution on public lands.

Add plan-level sideboards for motorized access where security is deficient

Scoping materials clarify that Travel Management Rule designations are not part of this plan revision; those will still be made under 36 CFR part 212. Even so, the forest plan can set wildlife sideboards that future travel decisions must satisfy. We recommend two clear elements:

1. No-net-increase in open-route density within priority elk ranges and mapped movement areas until the elk-security standard is achieved; any new public motorized access is conditioned on mitigation that achieves the standard first.
2. A forest-wide ceiling on area-weighted open-route density of 1.0 mile per square mile in priority elk ranges, unless the elk-security standard is already met and maintained.

The 2012 Rule requires standards and guidelines that maintain or restore ecological integrity and invites plan components for species used by the public for hunting. Subsequent Travel Management Rule designations must be consistent with the plan, are revisable with public involvement, and must be identified on a Motor Vehicle Use Map. The MAPLand Act and EXPLORE Act now require agencies to publish GIS-ready route status, seasonal dates, and allowed uses, which improves transparency and compliance for seasonal closures and route consolidation.

<u>Proposed forest-wide guideline (transparency and compliance)</u>

> Post seasonal closure dates and vehicle class allowances on the MVUM and in agency GIS data sets, consistent with MAPLand and EXPLORE Act §127, and coordinate with counties and ODFW on signage and outreach before the first affected season each year.

Manage ecological connectivity and big-game migration in line with agency policy

Preliminary analyses from more than 1,000 GPS-collared mule deer demonstrate the importance of the summer range that's provided by the Wallowa-Whitman, Umatilla, and Malheur national forests for big game herds. New migration corridors are still being discovered and researchers have observed some deer migrate as far as 60 miles from the Blue Mountains to the Malheur National Wildlife Refuge at the foot of Steens Mountain. Others move perhaps only a few miles. Because mule deer rarely alter their migration routes, the Forest Service should consider migration data in their planning processes. The information could be used to focus summer range restoration work to help wildlife build their fat reserves for winter survival and reproduction through thinning the canopy and restoring valuable shrubs on the forest floor. The location data from collaring mule deer and elk can also show land managers where deer and elk may get hung up on roads, highways, and fences, or where their historic paths intersect with potential development.

The 2012 National Forest Planning Rule allows the agency to look at the entire ecological and social sustainability of the forest. Instead of viewing forests as small pieces separate from one another, the rule encourages planners to look at how management of the forest can contribute to broader landscapes, including the role that a forest plays in providing important seasonal habitats and migration corridors for big game. The Oregon Department of Fish and Wildlife has prioritized collecting GPS information to learn where mule deer migrate - and more recently where elk move. The USFS should

take a holistic approach that incorporates migration corridors and key summer range data while incorporating input from local communities and tribes to support vibrant local economies along with robust wildlife populations. There are a number of specific elements of the Rule that directly support the inclusion of management direction for the conservation of migrating big game.

Specifically:

- The Rule sets expectations that new forest plan revisions will maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watershed within the plan area, including maintaining or restoring structure, function, composition, and connectivity *(§ 219.8).*
- The Rule requires taking into account how the plan area contributes to ecological conditions within the broader landscape (*§ 219.8(a)(ii)*), how conditions within the broader landscape may influence sustainability within the plan area (*§ 219.8(a)(iii)*), opportunities for landscape scale restoration (*§ 219.8(a)(vi)*), and opportunities to coordinate with neighboring landowners to link open spaces and consider joint management objectives (*§ 219.10(a)(4)).*
- The Rule requires that plans maintain the diversity of plant and animal communities and the persistence of native species in the plan area *(§ 219.9).* When the USFS cannot provide the conditions to maintain a viable population of a species of conservation concern within a plan area, the Rule requires contributing to maintaining the species within its range, in coordination with managers of other lands relevant to that population *(§ 219.9(b)(2))*.
- The Rule requires consideration of habitat conditions for species used by the public for hunting, fishing, trapping, gathering, observing, subsistence, and other activities *(§ 219.10(a)(5))*. The Rule directs the USFS to collaborate with federally recognized Tribes, Alaska Native Corporations, other federal agencies, and state and local governments when developing plan components to provide for habitat for species used and enjoyed by the public *(§ 219.10(a)(5))*.
- The 2012 Planning Rule emphasizes connectivity and disturbance processes. The Forest Service has issued additional direction to evaluate, maintain, and restore ecological connectivity and incorporate migration corridor considerations into planning. A straightforward way to implement this in the Blue Mountains is to adopt concise plan components that integrate with vegetation and access work.

Therefore, as the Blue Mountains National Forests work through the revision stages of the planning processes, we offer the following conservation recommendations for consideration and adoption:

- In addition to utilizing connectivity modeling and credible anecdotal information, TRCP requests that the Blue Mountains NF's utilizes empirical data from GPS collars, including high-priority migration routes and winter ranges, to establish Wildlife Habitat Management Areas, with associated plan components, to provide consistent management direction and conservation for these habitats across the planning area.
- Collaborate with other federal and state agencies, Tribes, and local governments when developing plan components for habitat used by big game species. The TRCP was encouraged to see the final assessment document for the Blue Mountains included a section on big game and habitat connectivity and we encourage the USFS to ensure close coordination with the Oregon

Department of Fish and Wildlife and other state/federal partners to utilize the recent data and to support conservation of these important migratory and seasonal habitats for big game and other wildlife.

- Prioritize strategic land acquisitions that connect and conserve seasonal habitats, reduce habitat fragmentation, and consolidate management, in conjunction with private, county, state, and Tribal land conservation efforts, to protect important winter ranges that are threatened by development.
- Prioritize vegetation treatments to improve forage quality and reduce conifer encroachment on open grassland meadows, brush fields, and winter ranges. In addition, the plan should specify that livestock grazing in known bighorn sheep ranges should be managed to prioritize maintenance of overwinter forage for bighorn sheep.
- Establish management areas for backcountry conservation to protect habitat security for big game in large blocks of summer range and transitional ranges and to provide for semi-primitive nonmotorized recreation, including hunting and fishing. Incompatible development activities should be restricted and active habitat restoration should be directed, both to restore wildlife habitat and ecosystem function and to facilitate resilience and adaptation in the face of drought and other stressors.
- With regard to route density standards, the Grand Mesa Uncompahgre and Gunnison National Forest final forest plan (2024) includes over 800,000 acres of "Wildlife Management Areas," for the purpose of improving wildlife habitat. Within these WMAs, the USFS established route density standards to maintain habitat function while allowing for sustainable recreation TRCP greatly appreciates and supports the route density approach in important habitat areas on national forest. TRCP encourages the creation of route density standards in the Blue Mountains NF plans for Backcountry Management Areas and Wildlife Habitat Management Areas (if WHMAs are adopted).

<u>Proposed desired condition (connectivity)</u>

Connectivity is present and functional within known big-game movement corridors and seasonal ranges. Security blocks are well distributed and connected at sub-watershed and landscape scales.

<u>Proposed objective (barriers and routes)</u>

Each decade, remove or mitigate at least 10 priority barriers to wildlife movement, and reduce open-route density to meet the elk-security standard in at least 50 percent of mapped movement corridors across each National Forest. Coordinate with the Blue Mountain Elk Initiative, Tribes, and state agencies on corridor maps and priorities.

<u>Proposed standard (corridor protection during project design)</u>

Do not authorize new public motorized or non-motorized routes inside mapped high-use movement corridors unless analysis shows the corridor function will be maintained and the affected sub-watershed will still meet the elk-security standard.

Aquatic resources: align plan direction with PACFISH/INFISH and current science on roads
Road systems influence hydrology, sediment delivery, and barrier effects. The plan should strengthen "how" work gets done near streams and wetlands, recognizing that route consolidation and seasonal closures can reduce chronic sediment and chemical exposure while preserving access quality. The PACFISH/INFISH framework remains the baseline for riparian management and can be reinforced in plan components that address chronic sources tied to roads and trails.

Relevant scientific evidence and partner findings underscore significant risks to aquatic ecosystems from road and stormwater impacts. Increased runoff and fine sediment reduce pool quality, bury spawning gravels, and impair both fish and macroinvertebrate communities. The way roads are sited and how they connect to stream networks play a critical role in determining these impacts.

In addition, recent research has identified 6PPD-quinone (a chemical derived from tire wear) as a major threat to salmonids. This compound, commonly present in roadway runoff, has been shown to cause acute mortality in juvenile and adult coho salmon and negatively affect other salmonid species. Limiting storm-event exposure, particularly in headwater networks that drain into salmon habitat, is therefore a prudent and necessary management approach.

<u>Proposed forest-wide guideline (hydrologic disconnection)</u>

> Where roads or trails occur in Riparian Management Areas, design and maintain features to disconnect road runoff from streams to the extent practicable; prioritize chronic problem segments for relocation, storage, or decommissioning. Track miles treated annually.

<u>Proposed standard (crossings and organism passage)</u>

> New, replacement, and reconstructed stream crossings on perennial streams, and on intermittent streams used by native fishes for spawning, will accommodate bankfull and flood flows and provide aquatic organism passage, unless doing so would measurably increase non-native encroachment into core native habitats.

<u>Proposed objective (net reduction of hydrologically connected road miles)</u>

> Over the first decade, reduce the length of hydrologically connected road segments in priority sub-watersheds by at least 10 percent, focusing on PACFISH/INFISH priority reaches and slope-unstable landforms.

This strengthens riparian outcomes while remaining consistent with leaving route-by-route decisions to later travel planning.

Monitoring, reporting, and adaptive management
We recommend a concise, public-facing monitoring suite that tracks the outcomes sportsmen and women care about and that the plan can influence.

Annual or biennial reporting

- Percent elk security by HUC12 sub-watershed, and the number and distribution of security patches ≥ 250 acres.
- Open-route miles and area-weighted open-route density by sub-watershed and by mapped movement corridor; closure effectiveness and compliance.
- Elk distribution during hunting seasons on public versus private lands, using ODFW and tribal collar data where available.
- Hydrologically connected road miles treated, stream crossing upgrades, and miles of streams restored.
- Publish these data layers with the MVUM and plan monitoring report, consistent with MAPLand and EXPLORE Act §127.
- Acreage of active management projects showing how many acres within those timber or restoration projects had co-benefits for aquatic or terrestrial species.

Adaptive triggers

If elk security declines below 30 percent in any sub-watershed for two consecutive years, defer new motorized route additions in that sub-watershed and prioritize mitigation to restore security before authorizing additional public motorized access.

This mirrors the practical monitoring and adaptive language we supported in GMUG National Forest Plan and gives managers and the public a clear yardstick.

Requested alternatives for analysis in the Draft EIS

The NOI invites additional alternatives and notes that a modified Preliminary Draft Proposed Plan may be considered. To ensure a robust NEPA record that addresses both habitat and access, we request:

- Alternative A-Security Floor: adopts the 30 percent elk-security standard with the 250-acre and 0.5-mile parameters and includes the no-net-increase sideboard in priority elk ranges until the standard is met.
- Alternative B-Corridor Emphasis: includes Alternative A elements and adds the connectivity desired condition and corridor standard above, with a decade target for barrier removals and route-density mitigation in mapped corridors.
- Alternative C-Adaptive Access: retains Alternative A but replaces the no-net-increase with a performance-based sideboard that allows limited new access if the sub-watershed still meets or exceeds the elk-security standard and monitoring confirms no decline for two reporting cycles.

These alternatives are consistent with the Preliminary Draft Proposed Plan's emphasis on desired conditions and starting-point plan components, and they remain fully compatible with the Travel Management Rule's separate designation process.

Implementation partnerships

The Blue Mountains Elk Initiative (BMEI) is a proven vehicle for funding and sequencing forage and security work, with a long track record of multi-party projects designed to keep elk on public lands and reduce private-land conflicts. We recommend the plan's "collaboration" section explicitly call out BMEI

for project development and monitoring, and commit to annual coordination with state agencies, Tribes, RMEF, OHA, and local governments on priorities.

Access, transparency, and public communication
Balanced access is central to TRCP's mission. The plan should affirm that high-quality public access will be maintained where it is not detrimental to wildlife, and that seasonal closures and route consolidation are practical tools to protect both hunting quality and herd performance. Posting accurate, GIS-ready status information and seasonal dates on the MVUM and in agency web maps is now required by MAPLand and EXPLORE Act; leveraging those tools will make seasonal elk-security measures more understandable and enforceable for the public.

This landscape supports one of the nation's most important Rocky Mountain elk populations and is central to Oregon's hunting culture and rural economies. The Preliminary Draft Proposed Plan provides a starting point. The additions above will make the plan both durable and implementable: an elk-security standard; a forage-security linkage; practical sideboards for motorized access where security is lacking; corridor-focused connectivity direction; and a concise monitoring suite built for transparency and adaptive management.

TRCP stands ready to assist with partner coordination, including BMEI and county briefings, and to help communicate how these plan components protect opportunity while maintaining high-quality access where wildlife can handle it. Thank you for your work on this important revision.

Respectfully,

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Attachments and references (selected):

Blue Mountains Preliminary Draft Proposed Land Management Plan (PDLMP), July 11, 2025 (direct PDF): https://www.fs.usda.gov/sites/nfs/files/r06/umatilla/publication/BMFPRComprehensivePPDFP_07112025.pdf

Blue Mountains Preliminary Need to Change (PNtC) (direct PDF): https://www.fs.usda.gov/media/248447

Notice of Intent (Aug. 5, 2025) – Purpose & Need, Proposed Action, Alternatives: https://www.govinfo.gov/content/pkg/FR-2025-08-05/pdf/2025-14846.pdf

2012 Planning Rule (Federal Register, 2012-7502): https://www.federalregister.gov/documents/2012/04/09/2012-7502/national-forest-system-land-management-planning

eCFR 36 CFR part 219 (Planning): https://www.ecfr.gov/current/title-36/chapter-II/part-219

Travel Management – 36 CFR 212.54 & 212.56: https://www.ecfr.gov/current/title-36/chapter-II/part-212/subpart-B/section-212.54 ; https://www.ecfr.gov/current/title-36/chapter-II/part-212/subpart-B/section-212.56

MAPLand Act (P.L. 117-114): https://www.congress.gov/117/plaws/publ114/PLAW-117publ114.pdf

EXPLORE Act §127 (16 U.S.C. 8425): https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title16-section8425&num=0&edition=prelim

PACFISH/INFISH overview: https://www.fs.usda.gov/r04/natural-resources/forest-management/pacfishinfish-overview

Starkey Science Update 13 (PNW Research Station): https://www.fs.usda.gov/pnw/pubs/science-update-13.pdf

Rowland et al. (2004): Effects of roads on elk (PNW): https://www.fs.usda.gov/pnw/pubs/journals/pnw_2004_rowland001.pdf