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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

WESTERN WATERSHEDS PROJECT,
CENTER FOR BIOLOGICAL DIVERSITY,
FRIENDS OF THE CLEARWATER,
WILDEARTH GUARDIANS, and
PREDATOR DEFENSE,

Plaintiffs,

v.

TODD GRIMM, Idaho Director,
Wildlife Services, and USDA WILDLIFE
SERVICES,

Defendants.

No. 1:16-cv-218-EJL-CWD

DECLARATION OF BRETT
HAVERSTICK

I, Brett Haverstick, declare:

1. My name is Brett Haverstick. I reside in Moscow, Idaho. I have lived there since 2007. I am personally aware of the matters set forth below, and if called as a witness I would and could truthfully testify thereto.

Background and Interest in Wolves

2. In 2009, I completed a Master's degree in Natural Resources from the University of Idaho.

3. I currently serve as Education & Outreach Director for Friends of the Clearwater (FOC), a non-profit organization based in north-central Idaho. I have served in this position since 2010. I am a member of FOC. I am also a member of Wild Earth Guardians, Center for Biological Diversity, Predator Defense and Western Watersheds Project.

4. As staff for FOC, I participate in the public involvement decision-making process for public lands in the Clearwater Basin. Based on my academic background and professional experience, I have gained an understanding of biology, ecology, conservation biology and public lands policy in this context.

5. In addition to my professional interests in public lands policy, backpacking, hiking, snowshoeing and camping on wild public lands are strong passions of mine. I enjoy recreating in all seasons.

6. I enjoy photographing wild areas and native fish, wildlife, bird and plant species. The gray wolf is my favorite native species to Idaho. Gray wolves symbolize wildness, beauty, sacrifice and loyalty. While I have never photographed a gray wolf in the wild, simply knowing they exist on the landscape is very satisfying.

7. Observing native wildlife in their natural element is spiritually uplifting. Over the years, I have observed elk, moose, deer, bighorn sheep, black bears, coyotes, bobcats, numerous bird species, countless insects, butterflies, reptiles, amphibians, and rodents. I have yet to observe a cougar, wolverine, grizzly bear, gray wolf, Canada lynx, pine marten or fisher in the wild, but I very much want to.

8. I also enjoy tracking animals and looking for their presence, such as tracks and scat. I have no professional training in tracking, but have grown familiar in identifying gray wolf tracks, as well as the scat of gray wolves, thanks to individuals that I work and camp recreate with. Gray wolf tracks are fairly large when compared to that of a coyote or dog. The size of gray wolf scat, and the amount of fur and bone fragments it contains, differentiates it from that of a coyote. Over the past decade, I have observed a decline in wolf scat in places like the N. Fork Clearwater drainage, the Selway-Bitterroot Wilderness and roadless wildlands in the Lochsa River corridor adjacent to the wilderness boundary.

9. Observing or looking for wildlife is a big reason why I spent time on public lands.

10. I have a particular interest in wolves. I greatly appreciate their social complexities and family structure. Over the years I have read many books and scientific literature about the species. *The Wolf: The Ecology and Behavior of an Endangered Species* by L. David Mech is an excellent book. The loyalty of the pack or family is not much different than that of the human species, and perhaps, even stronger.

11. I believe the gray wolf epitomizes the spirit and character of wildness. Thinking that wolves may be on the landscape has the unique ability to heighten an individual's senses, expand one's imagination and enhance the overall experience of a person in the backcountry. The scientific literature is clear that wolves also enhance ecosystem function. As a keystone

species, wolves positively affect many other animal and plant species. I believe it is critical that we allow wolves to fulfill their role on the landscape, particularly in places like the Clearwater Basin in north-central Idaho and other public wildlands in central Idaho.

Specific experiences in the Lolo Zone

12. The public lands immediately to the north and south of the Lochsa River, which Idaho Department and Fish and Game refers to as the “Lolo Zone,” is a place I visit frequently. I have been regularly visiting these National Forests for over a decade. I try to backpack 200-miles on the National Forests in the Clearwater Basin every year, with most trips taking place in summer and overlapping with spring and fall. I have backpacked extensively in the Mallard Larkins, Weitas Creek, Kelly Creek and Pot Mountain areas of the N. Fork Clearwater drainage. I have hiked hundreds of miles in the Selway-Bitterroot Wilderness, and frequent the wild lands in the Lochsa River corridor. Most, if not all, of these places lie within the “Lolo Zone,” along with the adjacent Selway Zone.

13. I intend to continue visiting these National Forests with the same frequency into the future, for as long as I am able. For example, this spring, I have a backpacking trip planned into the White Sand Creek, which is a main tributary of the Lochsa River. I have a second trip planned for this summer into the Selway-Bitterroot Wilderness via the Lochsa River corridor. I am also planning a summer trip into the Pot Mountain area of the N. Fork Clearwater.

14. I visit these National Forests in part due to their proximity with my home, but also because of the sheer wildness of the area. These places offer excellent solitude and physical challenge, along with abundant habitat for fish and wildlife. Much of the “Lolo Zone” is roadless, public wildlands that offers excellent habitat for large carnivores like gray wolves.

Many people believe that gray wolves were present in the N. Fork Clearwater prior to reintroduction efforts in Idaho by the federal government in the mid 1990's.

15. On my trips here, I always look for wildlife activity. Unfortunately, I have not seen a wolf on any trips to this area. However, I have seen wolf sign (scat) many times. I am able to differentiate wolf scat from coyote scat due to wolf scat's overall size, including the strong presence of bone fragments.

16. Observing wolf scat is gratifying because it indicates the presence of wolves. The landscape feels much more alive with the presence of species like gray wolves. While I hope to observe a wolf in these wild lands one day soon, I am satisfied in simply knowing that they are part of landscape. The presence of wolves on the landscape makes an individual feels part of a larger whole.

17. I can recall several trips where I observed wolf scat in the Lolo Zone. I have observed wolf scat over the past decade in the Kelly Creek and Weitas Creek drainage, as well as throughout Mallard-Larkins and Pot Mountain. On many trips over the years I have observed wolf scat along the Selway River and throughout the Selway-Bitterroot Wilderness. All of my observations have occurred on hiking trails or areas adjacent to trails.

Wildlife Services Wolf Gunning

18. I am painfully aware that several times over the past six years, Wildlife Services has conducted aerial wolf gunning operations in the Lolo Zone. I believe the total number of wolves that these operations have killed is 103.

19. Every time I learn that Wildlife Services has gunned down gray wolves once again in the Clearwater's Lolo Zone, I feel anxiety, a sense of loss and become extremely upset.

The aerial gunning of wolves in the Lolo Zone causes me harm and I know I am not the only one that feels that way.

20. I am deeply saddened at the suffering and harm that such gunning likely caused to the wolves. It's been reported by various professionals and members of the conservation community that gunning from a helicopter does not always result in a clean, quick kill, and that animals are often injured and must linger in pain before succumbing to their injuries.

21. There is a tangible loss to the landscape and ecosystem from Wildlife Services' wolf-killing. I sense a personal loss when wolf populations are artificially suppressed through these gunning operations. When I visit these areas following the gunning operations, I feel the loss of wolves. I have noticed a decline in my observations of wolf sign since these operations began. In 2006, I took my first trips into the area. Over the past ten years, I have observed a decline in wolf scat abundance. During the past two years, I have seen fewer wolf scat on or along trails than any years previously. I attribute this to recent aerial gunning operations combined with state-sanctioned wolf hunting and trapping season.

22. It also disturbs me that Wildlife Services has never really considered or disclosed to the public the environmental effects of its wolf suppression operations either on the presence and behavior of wolf populations in the Lolo and Selway Zones, the health and sustainability of Idaho's wolf population, or on wolf recovery area in the Northern Rockies. This is especially troubling to me because I know that the secure habitat in the Northern Rockies was expected to serve as a core area supporting wolf recovery and dispersal. It is also troubling to me because I believe Wildlife Services' operations are intended to reduce—and have reduced—wolf presence in the Lolo Zone and adjacent Selway Zone. This in turn reduces the likelihood that I will observe a wolf in the wild, since much of my personal recreation occurs in these areas,

impoverishing my experiences there. If Wildlife Services had independently analyzed and disclosed these environmental effects, in a scientifically rigorous analysis, Wildlife Services would have received even more outcry from the public and may have selected a different alternative, such as one that did not expand its actions to also killing wolves to “protect” elk.

23. Of course, the Wildlife Services gunning occurs in addition to the extensive wolf hunting by private hunters in the Lolo and Selway Zones. As much as ninety-nine percent of wolf deaths in Idaho are human-caused. For example, I am aware that hunters and trappers killed 256 wolves in Idaho in 2015 and an additional 256 wolves in 2014. On top of these deaths, in 2015, Wildlife Services or private livestock producers claimed the lives of an additional 54 wolves to “protect” livestock. In 2014 “livestock protection” caused deaths of 42 wolves. It troubles me that the 2011 Wildlife Services EA made no effort to anticipate the cumulative effects its actions could have when combined with extensive recreational wolf hunting and trapping, particularly on the Lolo Zone, where there is an 10 month wolf hunting and trapping season with no bag limits. I do not understand how any analysis that is in place today could omit such a significant factor affecting both the Lolo and Selway Zone wolves. If Wildlife Services had taken a hard look at the likely outcomes of its actions beforehand, maybe it wouldn’t have killed so many wolves in the Lolo Zone, and I would still be able to see and hear wolves in these wild places where I recreate.

24. The supposed justification to bolster elk populations is neither sensible nor accurate. As Friends of the Clearwater pointed out in our comments on the draft wolf EA, and peer reviewers highlighted in their review of IDFG’s original proposal to kill wolves in the Lolo Zone, IDFG’s elk population objectives are inflated. A wealth of information shows that elk decline in the Lolo Zone commenced before wolves were reintroduced or recovered and is

related to habitat condition. Burned areas that elk used for habitat have re-forested over time. Forest succession is the greatest reason for elk population decline in the Lolo Zone. Fire suppression and lack of stand-replacing fires over the last century has resulted in less open space and forage for elk and ungulates. The Idaho Department Fish & Game has acknowledged this in the past. While predation is a factor in elk population fluctuation, habitat loss is the greatest factor in the Lolo Zone. Wildlife Services cannot reasonably assert that its wolf-killing will help IDFG achieve its elk population objectives without considering any of these other elements.

25. I am also aware that under IDFG's new predation management plans, Wildlife Services may conduct similar wolf population suppression elsewhere in the state at IDFG's request, including in the Middle Fork Zone, which encompasses portions of the Frank Church - River of No Return Wilderness, and the Sawtooth Zone, which encompasses portions of the Sawtooth Wilderness and the Sawtooth National Recreation area. These areas comprise vast swaths of the central Idaho wolf recovery zone deemed essential to wolf recovery and persistence, but Wildlife Services can, under its current EA, target wolves there without any analysis of the effects its actions will have on local wolf populations' presence and behavior, the health and sustainability of Idaho's wolf population, or wolf recovery. Nor has Wildlife Services ever analyzed in detail how operations it could conduct in these areas, combined with extensive wolf hunting and trapping authorized by IDFG, could impact the resident wolf populations where its activities might occur.

26. As an active citizen and employee of FOC who closely follows management of the Nez Perce-Clearwater National Forests, I feel disempowered by the utter lack of public input sought or even notice given before conducting such wildlife killing on public lands. And FOC is disempowered from advocating for wolves on behalf of our members.

27. The stale 2011 EA does not serve this purpose. It provided no details on what type of wolf killing actions would occur in Clearwater Country, the Lolo Zone and/or the Selway Zone, or how many would be killed. It did not even consider the cumulative impacts of private hunting and trapping. Thus it provides no assistance in understanding Wildlife Services' current wolf killing activities in these areas.

28. An updated, thorough, public analysis is particularly important considering the State of Idaho sets its elk objectives and writes its elk management plans and predation management plans with little to no public input. That makes it even more important for the partner federal agency, Wildlife Services, to conduct its own independent, science-based public environmental analysis of its wolf killing actions pursuant to NEPA.

29. Instead, FOC, myself, and the public always find out about Wildlife Services gunning operations in the Lolo Zone after the fact. I heard for the first time through our counsel in this lawsuit that Wildlife Services has killed wolves to protect wild ungulates in the Panhandle Zone. If Wildlife Services kills wolves for livestock "protection" in Clearwater country, FOC never finds out beforehand either.

30. There is a contrast between these feelings relating to Wildlife Services' aerial gunning operations and my enjoyment of areas where wolves are not persecuted by Wildlife Services, or are persecuted far less, such as in the Frank Church-River of No Return Wilderness (FCRNR) just to the south. While unfortunately, wolves there have been occasionally persecuted by IDFG, they are not subject to the extensive gunning operations that Lolo Zone wolves have been subjected to. I know that wolves in the FCRNR are likely more abundant and less fearful, increasing the chances that I will be able to see and howl with these elusive predators. I fear that under Wildlife Services' 2011 EA, Wildlife Services could also kill wolves in the FCRNR

Wilderness and other wild places throughout the state without any further analysis or public notice. In fact, IDFG's new predation management plans for the Middle Fork, Sawtooth, and Panhandle Zones, which contemplate aggressive wolf reductions where elk are not meeting IDFG's objectives, suggest that such operations are likely.

31. I regularly recreate in the FCRNR. For example, I took a six-day snowshoeing trip last winter, in, January 2016, from the top of the Salmon River breaks to the Salmon River, itself.

32. While I didn't see any wolves, I did come across multiple wolf tracks, including those observed in the photo below. I was able to identify the tracks as wolves due to their size (approximately 4 inches wide by 5 inches long). I took this picture on my January 2016 trip, and it truly and accurately depicts what I observed on that trip.



33. Seeing these tracks was exhilarating and uplifting. It made me feel like the area was truly wild. It offered me hope that wild gray wolves can still persist on Idaho's public lands.

Injury from Wildlife Services

34. As described above, Wildlife Services' wolf killing program in Idaho significantly harms my interests in hearing, observing, protecting and recovering wolves in Idaho. It also harms my interests in experiencing an ecosystem restored to ecological integrity by reintroduction of apex predators, from the degraded state it was in due to the government-sponsored eradication of wolves from most of Idaho. Wildlife Services' continued implementation of its wolf-killing program will continue to harm my interests, particularly if its current activities continue to expand, as seems likely.

35. It this Court were to prevent Wildlife Services from conducting further lethal wolf control in Idaho until it completed an accurate analysis of its effects, that would help redress the injuries I described above. A new EIS that accurately assessed all the factors affecting wolves today (such as the long hunting and trapping season); sought up-to-date public input on Wildlife Services wolf management in Idaho; and provided notice to the public about Wildlife Services' wolf-related activities in Idaho, the Lolo Zone, and in other elk management units throughout the state would also lessen my injuries as described above. For example, it would allow FOC be able to represent our members on wolf management in the Lolo Zone and the rest of central Idaho by participating meaningfully in Wildlife Services' wolf killing decisions through the NEPA process.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of February, 2017, at Moscow, Idaho.

A handwritten signature in black ink, appearing to read "Brett Haverstick", written on a light-colored, slightly textured background.

Brett Haverstick