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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA

WILDEARTH GUARDIANS and
WESTERN WATERSHEDS
PROJECT,

Plaintiffs,

v.

U.S. FISH AND WILDLIFE
SERVICE,

Defendant.

Case No. 9:24-cv-00066-DLC-KLD

**SECOND DECLARATION OF
CHRISTOPHER J. KRUPP**

I, CHRISTOPHER J. KRUPP, declare as follows:

1. I am personally aware of the matters set forth below, and if called as a witness, I would and could truthfully testify thereto:

2. I am employed as the Public Lands Attorney at WildEarth Guardians.

3. Between 2021 and 2023, I engaged with the U.S. Fish and Wildlife Service (FWS) and Red Rock Lakes National Wildlife Refuge Manager Michael Bryant regarding concerns about the agency's grazing program at the Refuge. That engagement included a letter to the agency urging compliance with the National Wildlife Refuge System Improvement Act (Refuge Act) and National Environmental Policy Act (NEPA) prior to permitting cattle grazing on the Refuge in 2023. I also submitted the comment letter on behalf of WildEarth Guardians when FWS provided belated public process on a draft Compatibility Determination to support grazing under the 2023 permits.

4. In those comments, WildEarth Guardians raised with FWS the issue of its lack of staffing to monitor and adjust grazing as necessary to protect and preserve Refuge Wildlife habitat. *See* AR175–176. We pointed out that the Refuge's Comprehensive Conservation Plan had emphasized that “a minimum of one full-time seasonal biological technician” was needed to “greatly enhance the refuge's ability to assess the outcomes of grazing,” and expressed our understanding that the agency had not since employed such a technician and was

failing to meet the stipulations in its Plan due to lack of staffing. *Id.* The Refuge’s 2009 Plan had emphasized that its staff and funding levels at the time were already “inadequate,” and that was with “a full-time staff of five, including two managers, a biologist, an administrative assistant, and a maintenance worker.” *See* AR377.

5. FWS’s final 2023 Compatibility Determination did not identify the need for one full time permanent staff in the biological series to administer the grazing program; instead it said that “[t]he Refuge has three staffing positions that assist with grazing. In addition, seasonal hires have assisted with monitoring and conducted research related to grazing; the Refuge expects to continue this practice into the future.” *See* AR959.

6. However, recent public statements from leadership at FWS cast doubt on the Refuge’s assurance in 2023 that it would continue purportedly adequate staffing practices. That same doubt extends to FWS’s assurances about additional analytical processes and its monitoring and study of grazing on remand. This April, National Wildlife Refuge System Chief Cynthia Martinez told members of a call hosted by the National Wildlife Refuge Association that the agency’s “[c]apacity right now is at a tipping point that puts both the economic and the conservation vitality of the National Wildlife Refuge System at risk.” *See* Mike Koshmrl, *Report: Wildlife Refuge System ‘at risk’ with no units fully resourced amid DOGE uncertainty*, WyoFile (Apr. 18, 2025), <https://wyofile.com/report-wildlife-refuge->

[system-at-risk-with-no-units-fully-resourced-amid-doge-uncertainty/](#) (attached hereto as Exhibit 1). Martinez stated that a recent inventory of the refuge system concluded that not a single refuge was fully resourced with adequate funding and staff to “fully achieve administration, management and mission goals and objectives.” *Id.* “We acknowledge that we have no units or field stations that currently meet this standard,” Martinez said. *Id.*

7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 21st day of May, 2025



Christopher J. Krupp

Exhibit 1

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FEATURED TOP STORY

Report: Wildlife Refuge System 'at risk' with no units fully resourced amid DOGE uncertainty

Federal trove of wildlife habitat that includes seven Wyoming units is in shambles, the department's chief says.



by **Mike Koshmrl**
April 18, 2025



A herd of cow and calf elk scurry through the snow in May 2024 on the National Elk Refuge. (Mike Koshmrl/WyoFile)

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The nation's 573 national wildlife refuges are at risk and not a single refuge has the resources it requires, according to a recent U.S. Fish and Wildlife Service inventory.

Put together, the National Wildlife Refuge System encompasses 96 million acres, an area larger than Montana, and includes everything from the Arctic National Wildlife Refuge's 19 million acres in Alaska to the diminutive [Bamforth National Wildlife Refuge](#) — a springtime pitstop for migrating waterfowl — on Wyoming's Laramie Plains. Created [122 years ago under President Theodore Roosevelt](#), the system now lacks the workforce and other resources necessary to fulfill its mission — “to administer a national network of lands and waters for the conservation, management and, where appropriate, restoration of the fish, wildlife and plant resources and their habitats within the United States for the benefit of present and future generations of Americans” — National Wildlife Refuge System Chief Cynthia Martinez shared on Wednesday.

“Capacity right now is at a tipping point that puts both the economic and the conservation vitality of the National Wildlife Refuge System at risk,” Martinez told members of a call hosted by the National Wildlife Refuge Association.

The inventory, Martinez explained, sorted all 573 refuges into four categories. The first group of refuges was those that have “full required resources” — units that have adequate staff and funding to “fully achieve administration, management and mission goals and objectives” and provide public uses.

“We acknowledge that we have no units or field stations that currently meet this standard,” Martinez said.

Meanwhile, 57% of national refuges fall into the second category, defined as having “limited resources” and operating with “a portion of the required staff and funding.” These units can only “partially achieve goals,” she said.

“This is where we begin to see limited visitor center hours and stations heavily supported by volunteers,” Martinez said.

The third category of wildlife refuges are those with “insufficient resources.” Some 35% of the agency's properties fall in this camp, and they “lack sufficient staff and funding” needed to achieve their goals and receive “little or no maintenance or management.”



Cynthia Martinez, pictured, is the chief of the National Wildlife Refuge System. (USFWS)



Clouds threaten rain over Pathfinder Reservoir, July 2019. The surrounding land is managed by the U.S. Fish and Wildlife Service as a national wildlife refuge. (Dustin Bleizeffer/WyoFile)

A fourth and final category of refuges, 8% of all sites, are those agency leadership considers “shuttered.” The classification means that the federal properties lack “staff and funding necessary to achieve any goals,” Martinez said.

“Shutter doesn’t mean that the refuge isn’t still providing some level of habitat for species,” she said, “but it is just not receiving the staff or the funding that’s necessary to achieve [its] goals.”

Martinez’s hour-long briefing with advocates, former staff and “friends groups” that support the U.S. Fish and Wildlife Service was carefully apolitical. She never named President Donald Trump or Elon Musk, the billionaire leading the Department of Government Efficiency, which has been [gutting federal workforces](#) and exacerbating conditions for refuges and other federal lands in Wyoming and around the country.

“We’re still at the beginning of a new administration,” Martinez said. “We’re going to be getting more direction on our priorities of this administration as our new director is voted in.”



Brian Nesvik, retired Wyoming Game and Fish director, speaks at his final Game and Fish Commission meeting in Douglas in September 2024. (Mike Koshmrl/WyoFile)

The likely incoming director is Brian Nesvik, a former Wyoming Game and Fish Department director who’s cleared his [first two hurdles](#) in the U.S. Senate confirmation process.

“He has identified refuges as one of his top five priorities for the Fish and Wildlife Service,” Martinez said. “I’m expecting that we’ll see Brian sometime, hopefully in early, mid-May.”

If confirmed, Nesvik will be joined by Josh Coursey, a southwestern Wyoming big game hunting advocate who [just announced an appointment](#) to the Fish and Wildlife Service.

What about Wyoming's refuges?

Although Martinez outlined the status of the National Wildlife Refuge System's properties in broad strokes, the status of individual refuges remains undisclosed to the public. The list detailing which refuges fall into each category has not seen daylight, according to Desiree Sorenson-Groves, president of the National Wildlife Refuge Association.

"There is no way that's getting leaked out until I'm sure Brian [Nesvik] has a chance to get in and see it," she said.

WyoFile was unable to ascertain which categories Wyoming's seven federally managed refuges have been assigned to. Agency employees reported that they were unauthorized to talk with the media about the topic.

Wyoming's refuges include: the 1,166-non-contiguous-acre [Bamforth National Wildlife Refuge](#) on the Laramie Plains; the 1,968-acre [Cokeville Meadows National Wildlife Refuge](#) along the Bear River; the 1,928-acre [Hutton Lake National Wildlife Refuge](#) on the Laramie Plains; the 1,968-acre [Mortenson Lake National Wildlife Refuge](#) on the Laramie Plains; the 24,700-acre [National Elk Refuge](#) in Jackson Hole; the 16,807-acre [Pathfinder National Wildlife Refuge](#) surrounding the reservoir; and the 26,210-acre [Seedskadee National Wildlife Refuge](#) that winds along the Green River. (Refuges located on the Laramie Plains are included in the Service's [new Wyoming Toad Conservation Area](#) — a complex that provides habitat for the endangered amphibian.)



On June 18, 2024, the U.S. Fish and Wildlife Service gathered with partners and stakeholders to celebrate the establishment of the Wyoming Toad Conservation Area. (USFWS)

WyoFile was unable to file an interview request with the Fish and Wildlife Service's Mountain-Prairie Region, which includes Wyoming and seven other states. Its regional communications team has been eliminated and contact information has been [scrubbed from its website](#). Most if not all 12 members of the team accepted a recent buyout offer — the second round of the Deferred Resignation Program — in anticipation of an upcoming “reduction in force,” according to a federal employee familiar with the situation. WyoFile is granting the person anonymity for fear of retaliation.

Part of the reason the entire regional communications team took the buyout is because Interior Secretary Doug Burgum has signaled in [a secretarial order](#) that he's consolidating communications teams throughout his department and dedicated Fish and Wildlife Service teams will cease to exist.

Other programs within the agency are also being eliminated, according to the source. Earlier this week, members of Fish and Wildlife's "Science Applications" program showed up to work and were told to go home.

"They were told the program is being dissolved — I would guess it's because of the climate work — but they don't really tell us why," the source told WyoFile.

In the wake of the second round of buyouts, the Fish and Wildlife Service as a whole is "pretty gutted," according to the source.

"Moving ahead with even more cuts, I can't imagine," the employee said. "It's going to be incredibly difficult to function."



The U.S. Fish and Wildlife Service's Lander field office, pictured here in June 2024, is among the seven federal facilities in Wyoming being eliminated by the Elon-Musk-led Department of Government Efficiency. (Mike Koshmrl/WyoFile)

In Wyoming, cuts have affected many different Fish and Wildlife Service programs: There are [plans to close the agency's tribal office in Lander](#), a hollowing out of the staff of [the Saratoga National Fish Hatchery](#) and [blows to black-footed ferret recovery](#) programs. The lack of communications and publicly available information makes it difficult to know if any other programs have been impacted.

In shambles across the agency

During the National Wildlife Refuge Association call, one attendee asked Martinez about overall reductions in the workforce during the first three months of the Trump administration. Until the second round of buyouts are processed and contracts are signed, “we’re not going to know the true number,” she said.

But Sorenson-Groves, the association president, has come up with some ballpark numbers for the National Wildlife Refuge System portion of the agency. At the end of 2024, she said, there were roughly 2,350 employees. Although the system manages more acreage than the National Park Service, she pointed out, its workforce was only about a tenth of the size.



The Green River, a major tributary of the Colorado River, flows through Seedsdakee National Wildlife Refuge. (Katie Theule/USFWS Mountain-Prairie/FlickrCC)

The cuts, she said, are expected to reduce the workforce down to 1,800-1,900 by the end of May — when people who are taking early retirements will leave.

“The refuge system will have lost at least 20% of their staff, and it could be more,” Sorenson-Groves told WyoFile. “Other agencies, they’re dealing with that too — like the Forest Service or the BLM or the Park Service, but the refuge system was in a different place already.”

Wildlife refuges, she said, haven’t been prioritized by Congress or presidential administrations of either party for the last 15 years. During that period, the system lost 30% of its staff, while public visitation throughout the system climbed by 50%.

“People have found refuges and discovered them, which I think is wonderful, but they don’t have the capacity,” Sorenson-Groves said.

It’s not just the rank-and-file biologists and workers being hemorrhaged.

RELATED

Trump cuts may cost a trout-brooding, Wyoming toad-rearing federal hatchery its entire staff

Musk’s DOGE to eliminate Fish and Wildlife’s tribal Lander office, USGS’ Cheyenne water science station

A third of Fish and Wildlife’s regional directors have quit, according to the federal employee who WyoFile is granting anonymity. In the Southwest Region, only two of eight members of the leadership team are still on the job, the source said, and the communications leadership and headquarters office are “pretty much wiped out.”

The loss of leadership is an especially painful blow, Sorenson-Groves said.

“Those are people who have the institutional knowledge and, frankly, the political acumen to work through really complicated issues, whether it’s water or mineral extraction or habitat in highly urbanized areas,” she said. “These are complicated issues. And they’re all leaving.”



Lou Ann Broth

April 24, 2025 at 9:21 am

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