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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF IDAHO**

IDAHO CONSERVATION LEAGUE; and
GOLDEN EAGLE AUDUBON SOCIETY,

Plaintiffs,

vs.

U.S. FOREST SERVICE,

Federal Defendant,

and

IDAHO COPPER CORPORATION,

Intervenor-Defendant.

Case No: 1:25-cv-329-AKB

DECLARATION OF KAREN FULLEN

I, KAREN FULLEN, state and declare as follows:

1. My name is Karen Fullen. I am over 18 years of age. 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 reside in Boise, Idaho.

3. I am a member of the Golden Eagle Audubon Society (GEAS). I have been a member of GEAS since 2010. I am a member because I support GEAS's mission to build an understanding, appreciation, and respect for the natural world in order to conserve and restore natural ecosystems for birds and other wildlife.

4. I currently serve on the GEAS Board of Directors and chair its Advocacy Committee. I also volunteer for GEAS as a Habitat Patch Advisor, helping homeowners convert their conventional yards to native plant landscaping. I also serve as a voting member representing GEAS in the Boise National Forest's Highway 21 Corridor Management Collaborative. This group has been planning a number of campground and other recreational improvements along Grimes Creek Road, as well as other nearby areas along Highway 21.

5. I support GEAS's efforts to protect the Grimes Creek watershed, Boise National Forest, and Boise River from the potential CuMo mine. My understanding is that the CuMo Exploration Project approved by the Forest Service allows Idaho Copper to clear vegetation from over 70 acres of National Forest lands to construct roads and drill pads and other infrastructure. Each year for the next four years, from April 15 to December 15, up to four drill rigs could run 24 hours per day to drill 250 deep mineral exploration holes. Some of this drilling and land clearing will occur in Sacajawea's bitterroot habitat, and road construction could occur in riparian areas in headwater tributaries to Grimes Creek.

6. For the last 22 years, I have regularly spent time camping, hiking, and birding in the Grimes Creek watershed and nearby parts of the Boise National Forest.

7. I first visited the Boise National Forest and Idaho City in 2004, and fell in love with the area. It is my dream to have a cabin there someday if I can.

8. For now though, my husband and I camp several times each year in the Boise National Forest not far from the project area. Some of our favorite spots to camp, which we have returned to many times, are the Pine Flats, Tenmile, and Bad Bear campgrounds. Pine Flats is east of Garden Valley on the Banks-Lowman Road and along the South Fork of the Payette River. As the crow flies, Pine Flats is a few miles northeast of the Project area. Tenmile and Bad Bear are along Highway 21 northeast of Idaho City and to the south/southeast of the Project area.

9. Each camping trip involves hiking, enjoying native plant communities, and viewing wildlife, especially birds. My husband also enjoys fishing. We usually visit Idaho City or Garden Valley on these camping trips and patronize local businesses. Occasionally we use hot springs in the area.

10. When driving toward Idaho City, I enjoy stopping at the rest area along Highway 21 where Grimes Creek and Mores Creek meet to marvel at the creeks, look for fish like kokanee, and look for birds. This is known as a good spot to see Veery, a type of songbird. I have not seen a Veery yet, but I plan to keep looking for them here and hope to see them someday.

11. I also make a point of attending GEAS-sponsored field trips 1 to 3 times each year. In June 2023, I attended an Idaho Conservation League field trip to hike the Mores Mountain Nature Trail in the Boise National Forest with a plant biologist. In addition to looking for and observing numerous bird species, I was amazed at the diversity of wildflowers we saw.

We were lucky to find flowering Sacajawea's bitterroot. My understanding is that this plant species is very rare, found only in the mountains of south-central Idaho, and that it spends most of the year underground, popping up and flowering briefly after the snow melts.

12. From the trail high up on Mores Mountain, we were able to look north/northeast across the Grimes Creek watershed to the CuMo Project area. We only found a few Sacajawea's bitterroot plants at Mores Mountain. My understanding is that the CuMo Project area is home to thousands of Sacajawea's bitterroot plants, representing a significant portion of all individuals of this rare plant.

13. Last fall, I participated in an annual GEAS field trip to the Intermountain Bird Observatory's Hawk Watch and Raptor Banding Station at the top of Shaw Mountain (Lucky Peak) to look for birds and observe the bird banding operations. From the Observatory, I enjoyed gazing south to the Snake River Plain and Great Basin and then gazing north to the Boise National Forest and Mores Creek and Grimes Creek watersheds. I enjoyed the contrast between the more open, arid habitats to the south and the forested, mountainous, stream-laced habitats to the north. I appreciated learning about and observing the ways birds and other wildlife depend on and use these habitats, especially the raptors that travel great distances through both of these areas and beyond. It was especially exciting to get to view several species of raptors up close as they were being banded. I enjoyed my experience so much that I intend to make this an annual field trip during the raptor's fall migration.

14. I intend to continue regularly visiting these places in the future. My husband and I plan to continue our tradition of camping in the area, and I will attend at least one GEAS birding field trip in the area next year. I look forward to returning to the Mores Mountain Nature Trail to

go birding and look for Sacajawea's bitterroot again. I also plan to return to the Idaho Bird Observatory to volunteer, learn, and birdwatch.

15. I am concerned about the adverse impacts the CuMo Exploration Project will have on birds and other wildlife that I care about and enjoy looking for and observing. Many species of birds and other wildlife have large ranges and are sensitive to noise and lights from exploration drilling, are harmed by habitat loss caused by clearing vegetation to build roads and drill pads, and are harmed when streams and riparian areas are degraded when roads are built through them. I am also concerned about the Project's adverse impacts to Sacajawea's bitterroot. Vegetation clearing and other mine exploration activities have been authorized in occupied and potential habitat for this rare plant that I care about. The Project will adversely impact recreational fishing and wildlife and plant viewing opportunities and reduce enjoyment of being outdoors in nature in the places I love to visit.

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

Dated February 9, 2026, at Boise, Idaho

/s/ Karen Fullen
Karen Fullen