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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 GREG
FREISTADT**

I, Greg Freistadt, declare:

1. My name is Greg Freistadt. I am a resident of Moscow, Idaho. The following facts are personally known to me, and if called as a witness I would and could truthfully testify to these facts.

Personal Background

2. I have lived in Moscow, Idaho for about 12 years. I run a vegetable farm, which I feel gives me insight into operating an agricultural business within the greater natural world and the pressures that can bring to our livelihood. I am also an avid outdoors person, and spending time in our nation's wildlands is something I value very much.

3. I am a member of Friends of the Clearwater (FOC) and have been for about four years. I was a supporter of their events for several years before that.

4. As a member, I rely on FOC to represent my interests on activities affecting the environment and wildlife on the public lands of the Clearwater Basin.

5. Prior to living in Moscow, I lived in Montana for 20 years.

6. I came to Moscow to study Conservation Social Sciences at University of Idaho, receiving my degree in 2010.

7. Growing up in Helena, Montana, I have always had a love of wild places and wildlife, including wolves, but my studies at the UI increased my interest in wolves a great deal. My program emphasized public lands management and the positions of various user groups. Wolves were a hot topic in the news at that time and I had a lot of discussions with my classmates about wolves' role in Idaho. This experience made me

realize how important to me the presence of wolves were in the state. They restored a natural, historic balance to predator-prey relationships in central Idaho that was lacking before their return.

8. While in school and afterwards through independent research, I gained an understanding and appreciation for the important role of wolves in the ecosystem. I reviewed science explaining that components of the ecosystem are more robust when wolves are present. This is because wolves affect the entire ecosystem. For example, their presence affects prey behavior, which in turn affects the plant community. Wolves' relationship with elk have been proven to positively affect riparian areas and many aquatic species as well as beavers.

9. My main form of recreation is spending time in wild places, particularly central Idaho: backpacking, hiking, fishing, hunting, and floating rivers. I recreate in Idaho's wild country as much as I can, about 6-8 overnight trips per year, plus many more day trips, since I have lived in Idaho. Some of my favorite places to recreate are the Lochsa River corridor, the North Fork of the Clearwater, the Salmon/Challis area, the Bighorn Crags and the Lemhi Valley.

10. I love this region because it is such a huge contiguous chunk of wild country. This wild country is very dear to me, and one of the main reasons I live in Idaho.

11. I am also an avid hunter and fisher. I mainly hunt for deer, and sometimes elk. I also hunt for birds. I hunt about 5-10 times per year. The primary places I hunt are the North Fork of the Clearwater River drainage and the Lemhi area along the

Idaho/Montana border. The primary places I like to fish are the Lochsa/ Selway/ Clearwater drainages and the North Fork of the Clearwater drainage in particular. I like to visit these wild places for my hunting and fishing because there isn't any other place like it in the world. They are crucial components of the larger Northern Rockies ecosystem.

12. I appreciate wolves even though I am a hunter. While there is always a degree of competition between wolves and hunters, I believe it's a healthy competition. I am familiar with science that explains how wolves actually serve to strengthen elk and deer populations in the long-term and keep the entire ecosystem healthy. While wolves' presence might make elk and deer somewhat less visible to hunters, being outside on foot and putting in the time tracking the animals is an important ethical component of the hunt for me.

13. I intend to keep recreating and hunting in Idaho's wild country in this manner for as long as I am able. This includes regular visits this year, and in future years to the Clearwater Country, and Lochsa/Selway/Clearwater drainages. Specifically, later this year in October and November I intend to take a week-long hunting trip split between the Pot Mountain area of the North Fork of the Clearwater and Blacklead Mountain at the Kelly Creek headwaters area.

14. When recreating or hunting, I love seeing wildlife or their sign. This is especially true for wolves. It's thrilling to see or hear wolves, or find their sign. It makes me feel like the area is truly a wild place, and the ecosystem is a functioning one. Something big is missing without them.

Experiences Viewing Wolves

15. I have been fortunate to see or hear wolves, or find their sign, several times in Idaho. One memorable time was last summer on a float of the Middle Fork Salmon River, through the Frank Church-River of No Return Wilderness. One evening, we heard wolves howling and it just added so much to the trip that is hard to explain unless you have heard wolves. The lonely, raw howl of a wolf and knowing they are out in the landscape makes those wild places feel more intact. It gives me a great pride that we have places that exist and are protected that support these animals and aren't 'controlled' by man. The wolf to me is a great example of how we are part of a large system rather than the master of that system.

16. Another recent time was last summer during an elk hunting trip on the east side of the Lemhi Valley. We heard wolves howling at night. Then we saw their sign the next day. We followed their tracks to the top of a mountain and then saw where they had laid down and surveyed the canyons below. Elk had been in the area the previous day and we were sure that the wolves we had heard the previous evening had made those tracks. Even though we did not see elk on the trip, the trip was still a great experience for me in large part because of hearing those wolves.

17. I have seen wolf sign one time while hiking in the Selway-Bitterroot Wilderness south of Highway 12. This was out of Wilderness Gateway hiking to Stanley Hot Springs. I really enjoy going to hot springs so the Lochsa/Clearwater corridor is an area that I frequent a lot.

18. I am always surprised at why I do not see wolf sign more often during my

regular visits to Clearwater Country such as the Lochsa River area or the North Fork Clearwater, because it's very wild country and the habitat is good. I suspect this is related to the fact that Wildlife Services conducts its regular aerial gunning operations in this area.

Wildlife Services Operations

19. I am well-aware of the fact that Wildlife Services conducts aerial gunning operations in the Clearwater Country (or specifically, as they call it, the Lolo Zone), almost every February. I find these operations upsetting and wrong for several reasons.

20. First, it is devastating to me when I learn that wolves have been killed in such manner in the Lolo Zone, where I recreate and hunt. I have serious ethical concerns with such aerial gunning operations. Such operations are not even hunting-- there is no fair chase. The sadness really hits home when I'm out in Clearwater Country and think about how Wildlife Services is trying to eradicate packs of wolves. I feel their loss. It is upsetting and not fair to the ecosystem or those of us that rely on these areas for psychological renewal and recreation.

21. Second, aerially gunning such large numbers of wolves does not seem ecologically reasonable in this day and age. It is such heavy-handed management and it does not respect at all the ecological role that wolves play. It seems like a throwback to the past, not based on science, and totally inappropriate in this day and age.

22. Third, I am disturbed at the secrecy in which the operations occur. I understand Wildlife Services provides absolutely no prior notice and does not ask for public input on these operations. And there is very little information provided afterwards

as well. This lack of transparency is infuriating. It seems the agency operates under a real veil of secrecy, perhaps because they know what they are doing is wrong.

23. I count on FOC to represent my interests by participating in public review and comment on activities that affect wildlife in the Clearwater basin by, for example, providing science for the agency to consider. The fact is, however, that the State of Idaho sets elk management objectives and directs Wildlife Services to carry out aerial gunning of wolves to help meet those objectives without the State of Idaho doing any sound environmental analysis or public involvement, such as NEPA requires of federal agencies. That makes it even more important for Wildlife Services to conduct its own independent, scientifically-based, and public analysis of its Idaho wolf killing operations in compliance with NEPA.

24. Based on my personal understanding and communications with FOC, the 2011 Idaho Wolf EA that Wildlife Services relies on failed to undertake any independent, scientifically-based and public analysis of Idaho wolf killing operations, including aerial gunning of wolves to assist in Idaho's elk management objectives. Neither has Wildlife Services complied with its duty to prepare a full Environmental Impact Statement over its Idaho wolf killing, which certainly is highly controversial and has multiple significant direct, indirect and cumulative impacts, such as on local wolf populations and the experiences of people like me.

25. I am also saddened and disappointed at how many wolves in central Idaho are killed by Wildlife Services at the behest of public lands ranchers, when wolves are alleged to have killed or harassed livestock. I understand this happens regularly in the

Salmon, Challis, and Lemhi areas where I recreate. As a farmer myself, I feel that farming and ranching is a gamble and we have to work within the confines of nature. This is especially the case with public lands ranching, which I understand receives a significant subsidy compared to private land rates. Having to tolerate wolves should be part of the bargain. The government should not eradicate wolves at their behest.

26. My inability to participate meaningfully (through FOC) in the decisions that Wildlife Services makes to kill wolves throughout Idaho, because of the lack of public disclosure, has directly and tangibly harmed my personal interests. These harms would be lessened if Wildlife Services were ordered to stop this wolf killing. At a minimum, my harms would be lessened if members of the public, such as myself and Friends of the Clearwater on my behalf, were able to meaningfully weigh in on Wildlife Services wolf operations.

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

Executed this 9th day of February, 2017, in Moscow, Idaho.

s/ Greg Freistadt

Greg Freistadt