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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, USDA WILDLIFE  
SERVICES,

Defendants.

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

DECLARATION OF DAVID J. HUNT

I, David J. Hunt, declare as follows:

1. I am a citizen of the United States and a resident of Coeur d'Alene, Idaho, where I have lived for 33 years.

2. I am a current member of the Center for Biological Diversity ("the Center"). I read the Center's newsletters and I participate regularly in action alerts in an effort to take proactive steps to protect our region's biodiversity. In part, I rely upon the Center to represent my interest in conserving wildlife and wildlife habitat, including wolves.

3. I am also actively involved in ensuring that our nation's laws protecting our land, air, water, and wildlife are upheld, and when those laws are broken, that proper legal steps are taken to stop those illegal actions. I have published articles and participated in lawsuits that demonstrate this commitment.

4. In college, I took coursework in forestry, hydrology, geology, limnology, fisheries, and wildlife. I also worked for the United States Forest Service for a season and took additional relevant training at that time.

5. I have enjoyed observing wolves in Idaho in the past. For example, I personally observed a wolf near my cabin in the Selkirk Mountains, near Priest Lake during the winter of 1987. I phoned the Idaho Fish and Game Department that day and spoke to Ned Horner, who told me that he had received two other calls that morning based on similar sightings.

6. On another occasion, around July 4, 1994, I saw a wolf drag what I believed to be a dead coyote across a small forest road that provided access to a parcel of forest land that I owned near Chase Lake.

7. In 2013, my brother Bruce and I saw a wolf drinking from the Upper Priest River near its confluence with Upper Priest Lake. We had beached our kayaks at the confluence and hiked up the Upper Priest River about 1/4 mile. We were downwind and approaching quietly, hoping to observe moose that often use the area. Bruce spotted the wolf first, gave me the silence signal (finger to lips) and squatted down. I followed suit. Bruce then pointed out the

wolf. We watched the wolf as it drank, turned, and made its way into the forest. Bruce shot me a smile and his classic nod. It is a memory shared with my late brother which I will never forget.

8. I have owned land the Selkirk Mountain Region near Priest Lake for over 35 years. I am a lifelong kayaker, sailor, and fly-fisherman, and I still spend much of my summer months kayaking and sailing on Priest Lake. In the winter months I enjoy cross country skiing and snowshoeing around Priest Lake.

9. I also enjoy hiking, backpacking, and camping in the Selkirk Mountains, and do so regularly. I have done many solo trips, many trips with my brother, trips with friends, and have led group trips on Idaho's public lands. I consider myself a wildlife watcher, and enjoy spotting wildlife, including wolves, during my outdoor adventures.

10. I spend as much time in the wilds of the Selkirk Mountains as possible, and I look forward to many more adventures in the Selkirk Mountains and around Priest Lake this year. My sailboat slip is already reserved for another season at Blue Diamond Marina on Priest Lake. I also have an annual backpacking and camping trip in the Selkirk Mountains planned with friends, during which we will be enjoying the summer solstice. During the 2015 summer solstice annual camping trip, camped on top of the 7000 foot "Squawman" (now referred to as "The Wigwams"), I was thrilled to hear two wolves calling in the middle of the night, and it was the highlight of my hiking and camping trip that year. I would love to hear or see wolves again this summer.

11. I have also been fortunate enough to be able to incorporate my love for wildlife and the outdoors into my career in the past. For example, primarily in the 1980s, I worked as an associate editor and writer for "Sightlines," the journal of the Selkirk Priest Basin Association, now called the Selkirk Conservation Alliance. One of my primary areas of focus as a writer and editor was wildlife in the Selkirk Mountains and Priest Lake area.

12. Additionally, in the 1990s I owned a retail outdoor sporting goods store called Kootenai Kayaks and Canoes, Inc, and was able to lead many group kayaking trips in connection

with my shop. I led many of these trips were free of charge, with a goal of increasing awareness of the water quality and wildlife in the Selkirk Mountains and around Priest Lake.

13. My “church” has been and will continue to be the natural environment of the Selkirk Mountains. I seek respite, renewal, and resilience in the wild, including by observing the wildlife that make up the rich biodiversity in this region. The wolf, one of our magnificent fellow mammals, created in similar fashion to our own species, is part of that biodiversity. The wildlife of the Selkirks, including wolves, both feeds my spiritual fulfillment and calls out my service to help guard and protect them. I consider this service part of my own spiritual path.

14. For my entire adult life, I have felt a moral obligation to guard and protect those things that I love. I have a personal and professional history that reflects this. I believe that the wolf and other creatures have an inherent right to exist, and I believe that all life is sacred and not mine to own, take, or destroy.

15. Wolves are an integral part of the natural aesthetic wonder of the Selkirks, and thus conservation of wolves is important to me. The loss of wolves, including the loss of individual wolves, is a personal loss for me, especially after working towards their recovery and survival in Idaho.

16. I have a long-standing dislike for Wildlife Services, largely due to their history of killing innocent wildlife on Idaho’s public lands. I believe that their work in killing wolves and other wildlife, including many unintended target animals, is abhorrent and I am ashamed that my tax-payer dollars can be used to fund such cruelty.

17. By removing wolves and other native animals from the landscape, Wildlife Services’ activities in Idaho harm my recreational, spiritual, aesthetic, and ecological interests.

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

Executed on February 7, 2017 at Honokaa, Hawaii.

/s/ David J. Hunt  
David J. Hunt