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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.

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

DECLARATION OF RICHARD RUSNAK

I, Richard Rusnak, declare as follows:

1. I am a citizen of the United States and a resident of Nampa, Idaho. The following facts are personally known to me, and if called as a witness I would and could truthfully testify to these facts.

2. I am a current member of the Center for Biological Diversity ("the Center"). I regularly participate in support of the mission of the Center via commentary originating from personal experiences and directed towards various agencies responsible for the management and preservation of the biodiversity on America's public lands. In referencing the Center's newsletter, social media sites and action alert email correspondence, I advocate for protections of wildlife, including threatened and endangered species, that I feel personally connected to across the American West.

3. The Center is instrumental in keeping me updated and plugged into any new or continuing threats to the biodiversity of wildlands I have become physically and spiritually connected to over many decades of advocating for strengthening protections for biodiversity across the continent.

4. I have lived in Idaho for twenty-three years now and moved to the region specifically to explore remote country while backpacking, hunting, and paddling in Idaho's and the Intermountain West's vast wilderness and wildlife-rich backcountry.

5. Over the decades, since 1993, I have spent dozens of weeks in Idaho wilderness observing and connecting my spiritual center to intact wildlands. I spend weeks spring through fall each year hiking and backpacking the region's backcountry from the remote Owyhee Canyonlands to the Frank Church and many places in between. Most autumns I spend a period hunting elk with no qualms about sharing the hunt with a wolf pack. I enjoy watching all kinds

of wildlife and looking for its sign. I birdwatch every day and travel widely to hike and look for birds in their natural habitat.

6. Specifically, my favorite places to backpack, day hike, and watch wildlife are the remote wildlands habitat of wolves or other predators. Nearby, I frequent the Boise National Forest, the Payette National Forest, and the Sawtooth National Forest. I take such trips several times a year to engage and renew my spiritual connection to wild landscapes and all its moving parts.

7. I intend to continue my hiking and backpacking trips at this frequency for as long as I am able. For example, in early March of 2017 I have a planned snowshoe hike along Big Creek summit area north of Curtis Lake on the Boise National Forest. I am hoping to observe tracks or signs of wolves or other carnivores using this corridor. I will install a remote camera on the ridge, periodically returning to collect images in hopes of photographing wolves or other species using the area. I regularly hike this area and have off and on hunted elk in this area since 2005, having observed tracks and scat of carnivores on numerous occasions. Additionally, in July 2014, I volunteered for the Boise National Forest on the Cascade and Idaho City Ranger districts to monitor for the presence of rare carnivores using camera traps and DNA hair snares.

8. Later in the spring of 2017, as snow levels allow, I will retrieve photographs from 3 camera traps I helped install in June 2016 for a volunteer outreach and education project with Inspiring Connections Outdoors. The project is aimed at monitoring wolves and other rare carnivores near the headwaters of the Boise River.

9. My early years of connection to the natural world through birding likely sparked my wider interest in biodiversity. Early experiences watching wolves clinched my lifelong desire to do more towards protection of species, in particular wolves. I find deep solace in the

fact that predators belong to the landscape. Without their presence, the wild character and resilience of working ecosystems falter. I have come to understand that apex predators have many positive influences in their ability to add diversity to an ecosystem. Wolves, for example, keep ungulates on the move, which diminishes over-browsing and thus allows smaller species to move into habitat niches provided by the recovery of the flora.

10. I love seeing and hearing wolves, for their mere presence on the landscape means a vibrancy of life. From ravens and migratory song birds to the mesopredators that pursue them amongst the flourishing aspens, wolves stoke the fires of life.

11. Additionally, I feel as though my spiritual connections and my desire to engage management agencies towards upholding their role in protecting carnivores are further amplified in light of the effects of human-caused climate change and the ongoing fragmentation of natural systems across the continent.

12. Be it grizzlies on the North slope of Alaska or wolverine tracks in the Sawtooths of Idaho, I seek out wild carnivores via traveling under my own power in remote lands. This modern day privilege, to be able to slip from urban metropolis to seldom seen lands, is not lost for my appreciation. I seek these wild refugia to renew my spirits and if I am lucky enough to witness the presence of a carnivore on its native home, I carry this experience with me back to the comforts of urban life. Those memories spark my motivation to work towards their perpetuity. In sum, I am a whole person when in the presence of intact wilderness and feel an urgency to protect the wild character of all its intricate parts.

13. During my regular outings into Idaho's wildlands, I have been fortunate enough to observe or hear wolves on multiple occasions in Idaho's Frank Church-River of No Return Wilderness and the Sawtooth Wilderness and surrounding areas.

14. For example, during the first week of October in 1996, I observed 8 wolves, saw numerous scats and heard howling near Corduroy Meadows in the Frank Church-River of No Return Wilderness. An experience few will ever be so fortunate to observe. The meaning of wilderness, untrammelled by man was never so clearly evident to me than on that day. This experience sealed the deal for my personal engagement to voice my admiration for these creatures and work to prevent their demise.

15. From the town of Stanley, Idaho, I observed 3 to 4 wolves on the foothills south of the Salmon River during the first week of April, 2012. On another occasion in August 2012, I observed at least 6 wolves and heard howling below the site of Basin Butte Lookout in the meadows of Basin Creek on the Salmon-Challis National Forest. I have reviewed an Idaho Department of Fish and Game map of wolf packs and I believe both of these 2012 sightings were likely of wolves who were members of the Casino Pack.

16. This past July 2016, I observed fresh tracks of two adult wolves with tracks of younger wolves near the continental divide trail in Idaho's Centennial Mountains.

17. I have also observed and photographed wolves on multiple occasions in Lamar Valley in Yellowstone National Park, most recently in late May of 2015. A photograph I took is attached herein as Exhibit 1. In March 1996, I was privileged to have spent time watching a pack in Lamar Valley feed on a cow elk, which was aged later by park biologists to be a very old elk. The social interaction between pack mates and the pups of the year gave me hope that these intelligent animals were influencing not just the elk but several other species that relied on the kill site for sustenance.

18. I am aware that Wildlife Services kills a great number of wolves in central Idaho, including the specific areas that I love and spend time in, at the behest of livestock ranchers. I

am aware that they have killed numerous packs in the Sawtooth National Forest, the Sawtooth National Recreation Area, and the Salmon-Challis National Forest.

19. Specifically, I am aware that Wildlife Services killed several members of the Casino Pack in 2013. This means that Wildlife Services likely killed some of the wolves that I observed in 2012, as described above. I feel a deep loss for the wolves and the wild character of Idaho, knowing that wild wolves I observed were killed for little reason by a federal agency.

20. Such elimination of wolves and entire packs in these areas greatly saddens me and injures my interest in these areas' ecological integrity and biodiversity.

21. As I described above, I am aware of the ecological role that wolves play in a landscape. Their loss causes a tangible loss to the ecosystem. The aspen groves will wither under the over browse of no longer vigilant elk, cold waters will warm under now sunnier banks free of flora, the wild trout will be heat stressed, the morning chorus of bird songs will be less diverse and the beaver will find less forage to build their dams. Death by a thousand cuts can be felt by an ecosystem as well as the human spirit. I am exasperated that these agencies are using arcane, unscientific methods to limit the biological benefits of wolves and other carnivores in that their trophic influence increases biodiversity and resilience on the landscapes where they roam.

22. In the words of Aldo Leopold, "a thing is right when it tends to preserve the integrity, stability and beauty of the biotic community. It is wrong when it tends otherwise." I believe this whole heartedly. I believe what Wildlife Services does to wolves in Idaho is wrong.

23. I believe such killings also reduce my ability to view and hear wolves, particularly in combination with Idaho's long hunting and trapping season sanctioned by Idaho Department of Fish and Game. The woods in the Stanley Basin have grown quiet, where wolves howled

ages ago and briefly returned; now one hears only the wind. Even in the Boise foothills where I found a winter-killed elk one spring, the area has lost its glimmer of wildness under the influence of politics and misunderstanding. Most tragically, even Yellowstone has grown quieter of wolf howls with the slaughter of America's wolves as soon as they leave the park boundary.

24. I also find it troublesome that the Center and the public often find out about Wildlife Services' wolf killing activities only after the killing has started or been complete. Without a more transparent public process, the Center and other organizations I support cannot appropriately advocate for wolf protection in Idaho, and cannot timely inform the public as to what is happening to wolves in Idaho. As an active citizen I like to comment on matters concerning public lands management and I rely on the Center and other organizations to comment on such proposals. The failure to be able to do so directly harms my interests in wolf conservation and impedes my ability to advocate for wolves. I am appalled that Wildlife Services is relying on a 2011 document that did not even consider Idaho's hunting and trapping season to justify its current wolf killing program.

25. Wildlife Services serve only the livestock industry and are oblivious as to the damage their arcane practices have upon the landscape, nor the lost opportunity for Idahoans to enjoy abundant wildlife encounters, much like the ones I can now experience in Yellowstone.

26. In sum, through its persecution of wolves in Idaho and failure to properly and timely inform the public of its actions and the impacts of its actions, Wildlife Services' wolf killing activities directly harms my aesthetic, recreational, spiritual, ecological experiences, thus limiting my rights to advocate effectively for improving the resilience of America's natural heritage.

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

Executed on February 9, 2017 at Nampa, Idaho

/s/ Rich Rusnak
Richard Rusnak

EXHIBIT 1



Photograph by Richard Rusnak, Lamar Valley, May 2015.