

The Honorable Ricardo S. Martinez

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

COLUMBIA RIVERKEEPER, IDAHO)
RIVERS UNITED, SNAKE RIVER)
WATERKEEPER, PACIFIC COAST)
FEDERATION OF FISHERMEN’S)
ASSOCIATIONS, and THE INSTITUTE)
FOR FISHERIES RESOURCES,)
)
Plaintiffs,)
 v.)
)
SCOTT PRUITT, *et al.*)
)
Defendants.)
_____)

No. 2:17-cv-00289-RSM

**DECLARATION OF KRISTIN
LEE**

I, KRISTIN LEE, state and declare as follows:

1. My name is Kristin Lee, and I make this declaration based on my own personal knowledge.

2. I have been a member of Columbia Riverkeeper (“Riverkeeper”) since 2007.

3. From March through November, and periodically throughout the winter, I live on Puget Island in Cathlamet, Washington. Puget Island is a large island in the lower Columbia River, about 38 nautical miles upstream from Astoria, Oregon.

4. My husband, Mike Duley, and I bought our house on Puget Island in 1986 in order to enjoy the natural beauty, tranquility, and recreational opportunities—including salmon

1 and steelhead fishing—that the lower Columbia River provides. For the foreseeable future, we
2 intend to continue spending the majority of our time living on Puget Island.

3 5. I enjoy fishing for, catching, and eating salmon and steelhead, as well as sharing
4 these experiences with my friends and family. I mostly fish in the lower Columbia River within a
5 few miles upstream or downstream of our house on Puget Island. We fish for spring, summer,
6 and fall Chinook salmon, as well as summer and winter steelhead. I estimate that I fish for
7 salmon or steelhead about thirty or forty times each year. My husband probably fishes for salmon
8 or steelhead between sixty and eighty days each year. The lower Columbia River near Puget
9 Island can be a very productive salmon fishing area; in a good year, my family might catch and
10 keep as many as thirty salmon and steelhead here. Fishing is an important and enjoyable
11 recreational activity, and my husband and I intend to continue fishing for salmon and steelhead
12 in the Columbia near our house for the foreseeable future. I also enjoy cooking, eating, and
13 serving this locally caught salmon with my friends and family. The ability to enjoy and share this
14 local, sustainable food is an important part of my life in the lower Columbia River.

15 6. I am concerned that the Columbia River is becoming too warm for salmon and
16 steelhead. Because I fish, I understand that salmon and steelhead are sensitive to changes in
17 water temperature. During the last few years, we have frequently found it necessary to fish in
18 deeper water than ever before, as migrating salmon and steelhead seek the deeper, cooler parts of
19 the river during the summer and fall. I do not methodically measure or record river temperatures
20 when I fish, but during recent summers, the Columbia has felt remarkably warm to the touch. I
21 know that the salmon and steelhead that I fish for need cool water to migrate and survive, both as
22 juveniles and adults. I also understand that climate change is causing gradual increases in water
23 temperature that can harm these fish.

24 7. Without action to address warm summer water temperatures in the Columbia River

1 Basin, I am concerned that my opportunities to fish for, catch, and eat Columbia River salmon
2 will be reduced or disappear entirely. We have witnessed the gradual decline in salmon runs and
3 the tightening of restrictions on fishing over the past decades. I am also aware that Oregon and
4 Washington curtailed fishing in tributaries of the Columbia River during the summer of 2015
5 specifically in response to high water temperatures. I am concerned that high water temperatures
6 in future summers could harm salmon runs and force additional fishing closures on the
7 Columbia. Columbia River salmon and steelhead already face significant challenges to recovery,
8 and high summer water temperatures could seriously impact salmon runs and salmon fishing.
9 Action to control and reduce water temperatures in the Columbia River would protect and
10 improve my ability to fish for, catch, and eat salmon and steelhead and share those experiences
11 with friends and family.

12 8. Relatedly, we moor our fishing boat on a dock next to our house, in a shallow
13 backwater of the Columbia River called Welcome Slough. Mooring our boat here allows us to
14 leave our house and be salmon fishing in just a few minutes. During the past few summers,
15 Welcome Slough has become overgrown with water plants in a way that I have never before
16 seen. I believe that this invasion of water plants is related to, or exacerbated by, warm summer
17 water temperatures in the lower Columbia River. This excessive plant growth can make it
18 difficult for motor boats to navigate Welcome Slough and increases the time we spend cleaning
19 and maintaining our boat's engine. To make matters worse, the government's response to this
20 situation is to apply aquatic herbicides in Welcome Slough. I am concerned about the impact of
21 these herbicide chemicals on the Columbia River ecosystem. I believe that cooler summer water
22 temperatures in the Columbia River would reduce or eliminate these problems.

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

3 Executed this 28th day of August, 2017, at Portland, Oregon.

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5 /s/ Kristin Lee
6 KRISTIN LEE
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CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Bryan Hurlbutt
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Richard Adam Smith
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Sarah Ann Buckley
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Miles B. Johnson
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Dated: August 30, 2017

/s/ Bryan Hurlbutt
BRYAN HURLBUTT