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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

WESTERN WATERSHEDS PROJECT,
WILDEARTH GUARDIANS, CENTER FOR
BIOLOGICAL DIVERSITY, and PREDATOR
DEFENSE,

Plaintiffs,

v.

USDA WILDLIFE SERVICES,

Defendant.

No. 1:17-cv-206

**DECLARATION OF DAVID NOAH
GREENWALD**

I, David Noah Greenwald, state and declare as follows:

1. I am a resident of Portland, Oregon. The following facts are personally known to me and if called as a witness I could and would truthfully testify to these facts.

2. I have a Bachelor of Science degree in Ecology from Evergreen State College and a Master of Science degree in Forest Ecology and Conservation from the University of Washington. Before joining the Center in 1997, I worked as a field biologist, surveying northern spotted owls and marbled murrelets and banding Hawaiian songbirds.

3. I have been a member, conservation biologist, and now endangered species program director, of the Center for Biological Diversity (“the Center”) for more than 20 years. In these capacities, I have been responsible for monitoring the status of North American species, including predators and other wildlife targeted by Wildlife Services.

4. The Center is a nonprofit corporation founded in 1989 with offices in Victor, Idaho and across the country. The Center is actively involved in species and habitat protection issues throughout North America, and has over 63,000 members throughout North America, including in Idaho. The Center’s members include Idaho residents with biological, health, educational, scientific research, moral, spiritual, and aesthetic interests in the health of the natural environment. These members have interests in wildlife targeted by Wildlife Services in Idaho such as coyotes, foxes, black bears, mountain lions and ravens.

5. At the Center for Biological Diversity, we believe that the welfare of human beings is deeply linked to nature — to the existence in our world of a vast diversity of wild animals and plants. Because diversity has intrinsic value, and because its loss impoverishes society, we work to secure a future for all species, great and small, especially those threatened with extinction.

6. Since its inception, our organization has used biological data to affect federal land management and secure protections for imperiled species. We advocate for science-based wildlife management practices and public disclosure.

7. The Center has an ongoing campaign to reform Wildlife Services' predator control programs. The Center and its membership value the ecological role played by native wildlife targeted by Wildlife Services and object to the inhumane methods used to kill animals.

8. The Center seeks to protect predators and other wildlife targeted by Wildlife Services by bringing litigation seeking additional analysis of the environmental harms of those programs. In Idaho, the Center has separate litigation seeking additional analysis of Wildlife Services' killing of gray wolves, which is covered in a different Environmental Assessment than the one at issue here.

9. As an example of the Center's litigation targeting Wildlife Services, last year the Center brought a successful case challenging mammal damage management in California's North District. That case led to restrictions on the methods used by Wildlife Services, including aerial gunning and body-gripping traps, and a deadline for an analysis of the program in an Environmental Impact Statement. In addition, the Center last year brought a successful case against Wildlife Services in Arizona, which led to updated analysis of the program's impacts on endangered ocelots. The Center brought other recent, successful litigation against Wildlife Services in Oregon and has an ongoing case in Colorado.

10. The Center also has an active case seeking analysis under the Endangered Species Act of the environmental harm from tools that Wildlife Services uses to target predators, namely M-44 cyanide traps and livestock protector collars.

11. In addition to litigation, the Center's campaign against Wildlife Services includes efforts to educate the public by, for example, generating media critical of the program. Center staff routinely submit "letters to the editor," op-eds and press releases to media outlets.

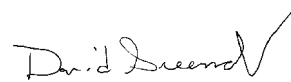
12. The Center's interests in predators and other wildlife are harmed by the actions of Wildlife Services, which targets animals in which our members have interests. We are particularly harmed by Wildlife Services' aerial gunning activities that may cause local extirpations of wildlife and by Wildlife Services' use of traps and poisons that may kill endangered species.

13. The Center has an interest in science-based management of wildlife. To that end, we object to Wildlife Service's focus on lethal management of predators to address conflicts with livestock, as the science shows that such an approach is ecologically harmful and ineffective.

14. If Wildlife Services would fully analyze the environmental impacts of its killing programs and halt its killing activities in the meantime, as the National Environmental Policy Act requires, our members would have the opportunity to provide public comment. By forcing consideration of current science and the environmental impacts of its actions, the agency's decision-making would be better informed. This would redress the injuries we have articulated in this action.

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Executed on January 23, 2018 in Portland, Oregon.

A handwritten signature in blue ink that reads "David Greenwald". The signature is written in a cursive style with a checkmark-like flourish at the end.

David Noah Greenwald