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

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

Plaintiffs,

v.

USDA WILDLIFE SERVICES,

Defendant.

No. 1:17-cv-206-BLW

**DECLARATION OF GRETCHEN  
VANEK**

I, Gretchen Vanek, declare as follows:

1. The facts set forth in this declaration are based on my personal knowledge. If called as a witness in these proceedings, I could and would testify competently to these facts.
2. I currently reside in Pocatello, Idaho.

3. I have been a member of WildEarth Guardians (“Guardians”) since December 17, 2014.

4. I graduated from Vanderbilt University in 1970 with a B.S. in nursing, and earned my Masters in nursing from Montana State University in 1987. I retired from the military nurse corps as a Lieutenant Colonel in 1994 and am married to a veteran.

5. I began supporting WildEarth Guardians because I thought coyotes were underrepresented in wildlife groups, and Guardians works to protect them. I feel like I have a strong connection to coyotes.

6. I live in Pocatello, Idaho. We live 200 yards from the Pocatello Creek washout. From our house, you cross a hay field to get to the washout, which is quite deep due to flooding. The washout and field are great coyote habitat, and I do everything I can to protect them. If I hear kids in the washout, I make sure they are not down there shooting at animals. We have had men stop by the house to ask if they could shoot coyotes from our property, which I refused. We also had a pest control person come by and tell me he could “take care of the pests.” When I told him that coyotes take care of the pests for us, it turned out he was referring to the coyotes. Our neighbors trapped out all the coyotes on their property, causing an epidemic of voles and rabbits. We still have rabbits living under our porch, but the coyotes have returned and taken care of the voles. We have heard pretty healthy coyote singing at night since they returned, which is a joy to experience.

7. My husband and I own a summer residence in Island Park, Idaho, fourteen miles from Yellowstone National Park. We have a huge field in front of the cabin and every year I see coyotes out hunting in the flat area. I enjoy watching them from a spotting scope; it is interesting

to see them toss a vole in the air and gulp it down. I get sung to at night. I was also able to watch a crow family grow up near the house.

8. In addition to enjoying the presence of coyotes and other wildlife around my homes, I, as an active naturalist, appreciate their contributions to the ecosystem. I became certified as a Master Naturalist six years ago through a course offered by the Idaho Department of Fish & Game. I was raised in suburbia, and knew very little about the outdoors. When I married my husband, he was quite the outdoorsman, and he got me interested in nature and helped me understand how important it is. I started doing a lot of reading about the Anthropocene and the Sixth Extinction, and became especially fascinated with birds and grizzlies. The Master Naturalist class clinched it and I've been obsessed ever since. I do not do many big hikes because I started so late in life, but I love data sheets.

9. As a Master Naturalist, I often volunteer to help Fish & Game with projects. In Pocatello in the winter, I participate in the beaver count at the end of January through Watershed Guardians. We snowshoe out with a beaver expert and tread a grid looking for beaver sign in the creek once a year. I also do short-eared owl monitoring two times a year, for three hours each time. I have participated in short-eared owl monitoring for the past three years, and am signed up to do it again in March and April of this year.

10. In Island Park, I put in about 40 hours of volunteer work each summer, participating in diverse projects including Western toad tadpole monitoring, stream monitoring and assessment, aspen stand risk assessment, bat surveys, and grizzly bear habitat assessment.

11. I assess two streams on the Nature Conservancy's Flat Ranch once a month for four months in the summer, which takes about three to four hours. I look forward to participating in stream monitoring again this summer.

12. I have participated in bat monitoring for five years. During the monitoring, I put the bat monitor on top of the car and drive a specific route half an hour after sunset. I usually do this for 3.5 hours once a month for five months. I am planning to do bat monitoring again this summer.

13. I participated in Western toad tadpole monitoring last summer, which took two hours a week for four weeks. I plan on participating again this summer.

14. I do small hikes of about five miles three times a week or so between May and October while at Island Park. I stay on roads and trails because of grizzly bears, but I always look for wildlife and wildlife sign.

15. I have seen coyotes and ravens when I am out doing surveys or hiking. It is really magical to see them in the wild; I really appreciate those moments of awesome nature I get to have for myself. I also do some tracking and take pictures to identify coyote tracks and scat. I have also identified and photographed black bear tracks in Island Park.

16. I plan to continue doing recreational hiking, wildlife observation, and wildlife monitoring, as detailed above, particularly near my Pocatello and Island Park residences. I currently conduct some of these activities on land managed by the Forest Service, Bureau of Land Management, and The Nature Conservancy, and I intend to continue using these areas into the future.

17. I don't believe in lethal control of native animals. I read Daniel Quinn's book *Ishmael* and found his philosophy very enlightening; one of the main tenets is that you do not exterminate a species. Humans are the only species that try to exterminate other species. I am ashamed of coyote derbies and other rampant killing of wildlife, and I am ashamed that the federal government supports it, for example, the Forest Service granting permits for coyote-

killing contests our public land. I think trapping is disgusting and M-44s are terrible; my husband knew the father of the boy who was poisoned and whose dog was recently killed by an M-44 in Pocatello.

18. I have opposed lethal control of ravens in Pocatello in the past. Idaho Fish & Game wanted to kill thousands of ravens by putting out poison eggs around Pocatello. I was very involved in that controversy. It is wasteful and silly to kill ravens, plus you would kill who knows how many other animals that want to eat eggs. I think it lowered my standing in Pocatello after I signed a petition opposing the plan and my comment was published in a local paper. But they didn't go through with the plan, so we were successful in the end.

19. It disheartens me when people don't give any thought to maintaining biodiversity. Wildlife Services in particular disturbs me because their go-to action is lethal control, which reduces my chances of seeing these animals. M-44s and traps make recreation on public lands unsafe. There is a lot they do not tell the public; it would make me very happy to force them to be more transparent.

20. I derive recreational, conservation, and aesthetic benefits from the existence and observation of coyotes, ravens, beavers, black bears, and other wildlife, and I rely on the Federal Defendants' compliance with the National Environmental Policy Act ("NEPA") to ensure management decisions are made based on science and for the benefit of wildlife and ecosystems. I believe that protecting these animals, and not killing them with indiscriminate methods such as traps, poisons and snares, will increase the ecosystem health of the places I live and recreate and my safe, safety and enjoyment of these important places.

21. When Wildlife Services kills wildlife, particularly near my homes in Pocatello and Island Park, and other wild places where I regularly spend time, it injures these interests. It

decreases the presence of wildlife on the landscape, or at least increases their wariness, making it more difficult to view them. It disrupts ecological processes, which, as a naturalist, I want to study, intact. It also pains me to know that this cruel and unscientific wanton killing of wildlife is going on in places I love.

22. I believe that if Wildlife Services conducts a comprehensive Environmental Impact Statement it is more likely to embrace modern ethics and science and recognize their value. Through an Environmental Impact Statement, it might reduce its coyote-killing or choose not to proceed with killing sage-grouse predators at the request of the Idaho Department of Fish & Game. This would redress my injuries, stated above.

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct. Executed on Jan. 24, 2018 at Pocatello, Idaho.



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GRETCHEN VANEK