

Laurie Rule (ISB # 6863)
Elizabeth Hunter Potter (OSB # 105482), *pro hac vice pending*
ADVOCATES FOR THE WEST
P.O. Box 1612
Boise, Idaho 83701
(208) 342-7024
(208) 342-8286 (fax)
lrule@advocateswest.org
epotter@advocateswest.org

Attorneys for Plaintiffs

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

WESTERN WATERSHEDS PROJECT, and
WILDEARTH GUARDIANS,

Plaintiffs,

v.

U.S. FOREST SERVICE,

Defendant.

DECLARATION OF CRAIG GEHRKE

I, Craig Gehrke, declare as follows:

1. I reside in Boise, Idaho. I have personal knowledge of the facts set forth below and if called as a witness I would and could truthfully testify to these facts.

2. I am a member of WildEarth Guardians (“Guardians”) because I support the organization’s mission to protect and restore the wildlife, wild places, wild rivers, and the health of the American West. In particular, I support Guardians because it takes action like this lawsuit to protect bighorn sheep populations from extirpation.

3. I have hiked in the mountains of Idaho, Montana, and Wyoming for 41 years. I hike these mountains specifically to see wildlife, especially rare species like bighorn sheep, and for solitude, spiritual renewal, and other recreational and personal purposes. My trips to the mountains are most memorable when I see wildlife like bighorn sheep. Seeing bighorn sheep during these trips provides me with deep aesthetic and spiritual satisfaction; the presence of bighorns signifies to me that I am visiting mountains that are largely ecologically intact and healthy and were not fully degraded by European settlers. I prefer to visit mountain ranges that support bighorn sheep to mountain ranges that have been logged and roaded and where the wildlife has long since been driven out. To me, bighorn sheep represent the wildest and best part of the West. Even if I don’t see bighorns while hiking in mountains where they reside, just knowing they are there adds to my personal enjoyment as well as determination to return again someday with the hope that I might see bighorns.

4. I have visited numerous places within the southern end of the Beaverhead Mountains along the Idaho and Montana border on the continental divide. This area corresponds with the South Beaverhead Bighorn Sheep Population Management Unit. I have hiked and camped in the Southern Beaverhead mountain range, which is also known as the Italian Peaks.

For example, I have hiked and camped in the Webber Creek drainage and Webber Lakes area, and in the Divide Creek drainage and Divide Lake area. I have also driven for pleasure on the Medicine Lodge Road over Bannock Pass into Montana. I have visited the southern Beaverhead Mountains approximately seven times over the past 10 years. The last time I visited was in 2016, when I camped and explored the Montana side of the Beaverhead Mountains within the South Beaverhead Bighorn Sheep Population Management Unit.

5. My trips to this region of the Idaho and Montana border are among the most memorable I've experienced. The basin and range topography of rugged mountains, sagebrush, and native grasses are among my most favorite landscapes to visit. One time on the Continental Divide I experienced perhaps one of the most intense mountain thunderstorms I've ever been in. I sat cold and huddled under a tree in the rain/sleet for nearly an hour before hiking out to the trailhead, all the while with thunder and lightning on both sides of the canyon I was descending. This experience to me personifies the best of wild nature and the risks and rewards involved.

6. I intend to return to these and other lands within the South Beaverhead Bighorn Sheep Population Management Unit and its vicinity to watch for bighorn sheep. I have specific plans for the summer of 2018 to hike into the Eighteenmile Wilderness Study Area on the Idaho/Montana border just north and adjacent to the Italian Peaks. I plan to continue to hike and camp in this area as long as I am physically able.

7. I am familiar with the science that shows contact between domestic sheep and bighorn sheep exposes bighorn sheep to disease and that even a contact with a single bighorn can result in catastrophic die offs in a population.

8. I have personally experienced the devastating impacts that occur when bighorn sheep are exposed to diseases carried by domestic sheep. I have hiked in Hells Canyon along the

Idaho and Oregon border for 35 years, and was accustomed to seeing bighorn sheep in the Canyon during my trips. However, in the late 1990s, disease swept through the bighorn populations in Hells Canyon after bighorn sheep came into contact with domestic sheep and goats, which caused the bighorns to die. For example, I had observed the bighorn population in the Big Canyon area that died out after the population was exposed to domestic goats that were used on nearby private lands to eat weeds. I have continued to return to hike and visit Hells Canyon but have not seen a bighorn on the Idaho side of Hells Canyon for nearly 15 years.

9. Based on this knowledge and my experience, I fear that the Forest Service's decision to authorize grazing on the Snakey Canyon and Kelly Canyon allotments will result in contact between domestic sheep and bighorn sheep, which will expose the South Beaverhead population to disease and increase the risk of catastrophic die-offs in the population. I also fear that exposing the bighorns in the South Beaverhead Bighorn Sheep Population Management Unit to domestic sheep not only puts at risk those bighorns in that Unit but also bighorn populations in areas nearby, like the populations in the Lionhead and Centennial Mountains area. I know that science has documented bighorn sheep can foray more than 30 miles from their core herd home range, so it is reasonable to fear bighorn sheep from these nearby areas could travel to the Snakey Canyon and Kelly Canyon allotments or nearby areas where they could contact domestic sheep.


10. Despite my several visits to the South Beaverhead areas described above, I have never been able to view a bighorn sheep. I know the bighorn population in this area is very small, which makes it less likely I will encounter a bighorn sheep during my visits to the South Beaverhead mountain range. I fear that grazing on the Snakey and Kelly allotments will result in contact between domestic and bighorn sheep that will spread disease to bighorns and that such

contact will keep the population low or cause a catastrophic die-off, which would make it even less likely or impossible for me to view the bighorns in this area. If the bighorn population remains at dangerously low numbers or is lost forever, I would suffer from substantially reduced enjoyment of these wild areas.

11. Knowing that the South Beaverhead bighorn sheep population uses the mountain ranges where I have recreated has been, and continues to be, a source of great enjoyment for me, and it is one of the reasons I choose to return to the South Beaverhead mountain areas. A healthy, robust bighorn population would provide an even greater incentive for me to return more frequently to this area. If the Forest Service allows domestic sheep grazing on the Snakey Canyon and Kelly Canyon allotments in this bighorn habitat, I fear the bighorn herds will continue to do poorly and possibly die out. Thus the Forest Service's decision to authorize grazing will continue to negatively impact my aesthetic, recreational, personal, and spiritual experiences. These injuries will continue in the foreseeable future unless the Court intervenes and halts domestic sheep grazing on the Snakey Canyon and Kelly Canyon allotments.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of October, 2017.

s/ 
Craig Gehrke