

Laurence (“Laird”) J. Lucas (ISB # 4733)
Bryan Hurlbutt (ISB # 8501)
Garrison Todd (ISB # 10870)
ADVOCATES FOR THE WEST
P.O. Box 1612
Boise, ID 83701
(208) 342-7024
(208) 342-8286 (fax)
llucas@advocateswest.org
bhurlbutt@advocateswest.org
gtodd@advocateswest.org

Attorneys for Plaintiffs

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

WESTERN WATERSHEDS PROJECT,)	No. 01:19-cv-065-REB
WILDEARTH GUARDIANS, and CENTER)	
FOR BIOLOGICAL DIVERSITY,)	
)	DECLARATION OF BONNIE
<i>Plaintiffs,</i>)	ALTSHULD
)	
v.)	
)	
U.S. SHEEP EXPERIMENT STATION, and)	
USDA AGRICULTURAL RESEARCH)	
SERVICE,)	
)	
<u><i>Defendants.</i></u>)	

I, BONNIE ALTSHULD, state and declare as follows:

1. I am over 18 years of age. 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. My name is Bonnie Altshuld. I live in Island Park, Idaho.
3. I am a member of the Center for Biological Diversity (the Center). I have been a member of the Center since September 2018. I am a member because the Center represents my interest in conserving grizzly bear, sage grouse, bighorn sheep, and other species and their habitats I care deeply about. As a member, I participate in the Center’s action alerts; I call and

email elected officials to advocate for matters important to me and the Center; and I stay up to speed on issues through the Center's newsletters.

4. Wildlife and wildlife habitat are very important to me personally. I feel nurtured and renewed by my experiences in nature looking for and observing wildlife.

5. I first visited Island Park 17 years ago. I moved to Island Park six years ago because of my love for wildlife, fishing and nature. Biodiversity in the Rocky Mountains is very important to me, because of my passion for animals and nature. Island Park, the Centennial Valley, and other areas near my home that I regularly visit are part of the Greater Yellowstone Ecosystem and part of an important corridor linking Yellowstone with other protected habitats in the Northern Rockies. I live in an area where grizzlies travel from Yellowstone to Harriman State Park to the Centennials.

6. At home, I can easily get outside to enjoy nature, and I regularly do so. I can even look out my window and see wildness and enjoy wildlife. Nearly every day I walk in the sagebrush meadows and forests near my home. I enjoy watching for and observing wildlife, and their signs, while I am out.

7. I intend to continue regularly walking in the meadows and forests near my home, looking for wildlife and enjoying nature, as I have in the past. Among other species, I will continue looking for grizzly bears, bighorn sheep, and sage grouse, each of which I hope to see signs of or observe living in or near Island Park or passing through the area.

8. I also intend continue to regularly visit the area around Red Rocks National Wildlife Refuge in Montana's Centennial Valley to go camping, birding, and looking for wildlife. The Centennial Valley and Red Rocks Lakes NWR is a very special place to my husband and me. We first visited the Centennial Valley in 2004. Now, we visit the area as much

as we can every year, sometimes several times a month. In 2017, to help protect this special area, we helped form an organization: Friends of Red Rock Lakes National Wildlife Refuge and the Centennial Valley.

9. Two of my favorite memories from visiting the Centennial Valley center around grizzly bears. One time, driving through Valley, my husband and I came upon a group of people who had just observed a grizzly bear scratching its back on a tree on the forested slopes above the Valley. We stopped and looked for the grizzly in the forest on the edges of the Valley floor. While we did not see the grizzly, it was a thrilling experience, and I remain on the lookout for grizzlies when we visit the Valley in hopes of spotting these magnificent creatures. Another time in the Valley, while visiting a friend's cabin in Lakeview, we observed a grizzly walking through the meadow near the cabin. It was a thrilling experience that made my heart soar.

10. Part of my yearly routine in the Centennial Valley is looking for sage grouse leks, which are areas sage grouse return to year after year to breed. However, the Centennial Valley is difficult to access during the sage grouse breeding season, and my husband and I are not usually able to visit the Valley until after the season ends. I have learned, however, that there are sage grouse leks on the Idaho side of the Centennial Mountains, leks which are accessible in spring during the breeding season. I would like to look for and observe sage grouse at leks or in their nesting or brood-rearing habitat on the Idaho side of the Centennial Mountains.

11. In addition to grizzly and sage grouse, I enjoy looking for and seeing other wildlife, including moose and wolves and many types of birds. I would love to see Rocky Mountain bighorn sheep—something I have never seen before in the Centennial Valley. I understand that bighorn sheep were once more plentiful in the Centennial Mountains near Island

Park and near the Centennial Valley, that their populations have declined significantly, but that they are still hanging on in parts of the Centennial Mountains and nearby areas.

12. My life would be less fulfilling if grizzly bear, sage grouse, and bighorn populations are unable to recover or if they decline farther or are less prevalent in and around Island Park, the Centennial Valley, and the Centennial Mountains. Once plentiful, grizzly bear, sage grouse, and bighorn sheep and their suitable habitats have declined substantially throughout their historic range. Island Park, the Centennial Valley, and other areas around the Centennial Mountains are one of few places left where these magnificent creatures exist and are co-existing with ranchers and visitors, at least in some areas. But even here, their population numbers are depressed and remain at risk.

13. In addition to reading the Center's newsletters, I stay up to speed on wildlife conservation issues by reading books and articles and attending lectures. For example, I attend as often as I can "Science Wednesday" events at the Taft-Nicholson Center in the Centennial Valley where conservation biologists and other scientists and researchers present on their work in the area.

14. In these ways, I have learned about the USDA's Sheep Station and its historical and ongoing activities and the impacts it has had on wildlife and wildlife habitat. The Sheep Station uses its own properties, and other federal lands, in and around the Centennial Mountains for sheep grazing and research. I am concerned that the Sheep Station's plan to graze these areas puts the species I care about at risk and will prevent their recovery and decrease my chances of observing them and their signs.

15. Two Sheep Station grazing properties—the East and West Summer Ranges—are located in the heart of the Centennial Mountains, not far from the Centennial Valley and Red

Rock Lakes National Wildlife Refuge. In fact, my friend's cabin in Lakeview, where we observed a grizzly, is only a mile or two as the crow flies from the West Summer Range.

16. The Sheep Station's plan to graze sheep on the East and West Summer Ranges, and at other locations used by the Sheep Station, puts wildlife species I care about at risk. Sheep grazing creates a risk of conflict between grizzly bears and sheep and sheep herders. Such conflicts are a leading cause of grizzly bear mortality, as bears are sometimes killed to resolve these kinds of conflicts. Sheep grazing also puts any bighorn living nearby at risk of coming into contact with domestic sheep and contracting disease, which has been documented to wipe out entire herds of bighorn sheep.

17. At its Headquarters property on the Idaho side of the Centennial Mountains, the Sheep Station proposes grazing in important sage grouse habitat, including grazing in sage grouse breeding, nesting, and brood-rearing sites. These areas are already degraded due to fencing and other habitat modifications that are prevalent throughout the Headquarters property, and sheep grazing will further interfere with sage grouse and degrade their habitat.

18. The Sheep Stations' Environmental Impact Statement, Record of Decision, and other decision documents to authorize continued Sheep Station domestic sheep grazing in and around the Centennial Mountains and other areas that I frequently visit and use, do not fully or adequately address the likely adverse impacts to grizzly, bighorn, sage-grouse and other wildlife that I care about, and they deprive myself and other Center members, and the public, of information on those impacts and alternative courses of action that the Sheep Station should fairly evaluate in order to reduce such conflict. A court order reversing the EIS and ROD, and ordering the Sheep Station to fully comply with its duties under NEPA is necessary to prevent

further injuries to myself and other Center members, and protect the wildlife and habitats at risk from Sheep Station grazing.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed the 16th day of December, 2019, at Island Park, Idaho.

A handwritten signature in black ink, appearing to read "Bonnie Altshuld", written in a cursive style.

Bonnie Altshuld