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

WESTERN WATERSHEDS PROJECT, )  
WILDEARTH GUARDIANS, and CENTER )  
FOR BIOLOGICAL DIVERSITY, )  
 )  
*Plaintiffs,* )  
 )  
v. )  
 )  
U.S. SHEEP EXPERIMENT STATION, and )  
USDA AGRICULTURAL RESEARCH )  
SERVICE, )  
 )  
*Defendants.* )

No. 01:19-cv-065-REB

**DECLARATION OF ANDREA  
SANTARSIERE**

I, Andrea Santarsiere, state and declare as follows:

1. 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 live in Victor, Idaho, where I have lived since April 2011.
3. I have been a member and employee of the Center for Biological Diversity (Center) since 2014. I fully support the organization’s mission to secure a future for all species, great and small, hovering on the brink of extinction, through science, law, and creative media, with a focus on protecting the lands, waters, and climate that species need to survive.

4. I have been engaged in environmental advocacy work and litigation since 2006. From 2006 to 2009, I worked as an associate attorney with Earthjustice in Denver, Colorado. My work entailed legal research and drafting litigation documents for cases mostly focused on protecting wildlife and wildlife habitat in the Rocky Mountains.

5. In 2011, I began working as an Idaho Conservation and Legal Associate with the Greater Yellowstone Coalition (GYC), where I spent the next three years working to safeguard Idaho's wildlife and wildlife habitat. In my role at GYC, I was the organization's spokesperson and advocate on issues related to the U.S. Sheep Experiment Station ("Sheep Station"). My work included, for example, participating in a tour of the Sheep Station in August 2011; submitting comments during the National Environmental Policy Act (NEPA) environmental review process raising concerns about the negative impacts of the Sheep Station's operations on myriad native wildlife, including grizzly bears, bighorn sheep, and sage-grouse; meeting with USDA Agricultural Resource Service (ARS) Deputy Under Secretary Ann Bartuska in Washington, D.C. to discuss issues related to the Sheep Station in February 2012; meeting with Bureau of Land Management employees Chris Iverson and Danielle Chi to discuss concerns about the Sheep Station in June 2013; and submitting numerous Freedom of Information Act requests and reviewing the obtained documents.

6. Before joining the Center, I also worked as a legal contractor with Western Watersheds Project (WWP) for six months in 2014, where I focused most of my time researching legal avenues to protect grizzly bears in Wyoming.

7. In my capacity with the Center, I have focused much of my time on protecting grizzly bears in the Northern Rockies and the habitat that they rely upon to survive. My work has continued to include work directly related to the Sheep Station, including submitting comments

on the 2016 Revised Draft Environmental Impact Statement and the 2017 Final Environmental Impact Statement. Additionally, I have worked elsewhere to protect grizzly bears in the Greater Yellowstone Ecosystem, including fighting through litigation and advocacy the U.S. Fish and Wildlife Service's (FWS's) rule removing Endangered Species Act (ESA) protections from Yellowstone's grizzly bears; submitting petitions in Idaho and Wyoming asking the states to require hunters to carry bear spray when hunting in occupied grizzly bear habitat; filing litigation seeking to get FWS to update its outdated 1993 Grizzly Bear Recovery Plan; drafting a letter asking the Yellowstone Ecosystem Subcommittee to update its 2009 Yellowstone Mortality and Conflicts Reduction Report; and commenting on land project proposals that would negatively impact grizzly bear habitat, amongst other things.

8. The Center is a 501(c)(3) non-profit organization founded in 1989 with offices across the United States, including Victor, Idaho; Tucson, Arizona; Portland, Oregon; Denver, Colorado; Seattle, Washington; Oakland, California; Washington, D.C.; and numerous others. The Center is actively involved in species and habitat protection issues throughout North America, and has more than 67,000 members, including 398 members in Idaho and 390 members in Montana. The Centers' members and staff include Idaho and Montana residents with scientific, aesthetic, recreational, spiritual, educational, and professional interests in grizzly bears, bighorn sheep, and sage-grouse and the lands where these species live.

9. The Center has a long history of advocating for the conservation of imperiled species, including grizzly bears, bighorn sheep, and sage-grouse. For example, through advocacy and litigation, the Center has fought for decades to ensure the recovery of grizzly bears across the American West, including fighting for connectivity between existing populations and for reintroduction of grizzly bears in the portions of their historic range that remain suitable habitat.

The Center has petitioned for reintroduction of grizzly bears in the Selway-Bitterroot and has supported the proposal to augment the population in the North Cascades. Through advocacy, media, and litigation, the Center fought the recent proposals in Idaho and Wyoming that would have opened hunting seasons on grizzly bears for the first time in more than 40 years. The Center has also fought and is currently fighting against numerous land management proposals—including proposed logging projects, road construction projects, and mines—that would destroy and fragment habitat in the Selkirks and Cabinet-Yaak ecosystems, where grizzly bears are still struggling to survive and recover. Grizzly bear conservation has been, and continues to be, a key campaign for the Center.

10. The Center also has been heavily involved in efforts to protect sage-grouse since at least 2010. As such, the Center has developed significant expertise in the biological and habitat needs of sage-grouse and their population trends. Because of the Center's involvement in greater sage-grouse protection across its 10-state western range, including Idaho and Montana, the organization has also developed significant expertise as to the current threats to the bird, such as livestock grazing. The Center's engagement with protecting sage-grouse and its habitat includes legal, policy, and planning advocacy as well as staying current on sage-grouse conservation science.

11. Specifically, the Center's historic and current engagement includes filing a notice of a lawsuit against FWS in 2010 for unlawfully delaying protection of the sage-grouse under the ESA when FWS found the bird warranted listing but that it was precluded from listing because of lack of resources; deeply engaging in development of the range-wide 2015 land management plan revisions and the 2019 BLM land management plan revisions that significantly weakened protections across of the range of the sage-grouse (which the Center is challenging in other

litigation before this Court); actively monitoring threats to the bird across its range, particularly including Idaho and Montana; and advocating for increased protections for the species and its habitat at multiple levels, including commenting on proposed land use and forest plans, commenting on proposed leasing and development decisions and associated NEPA documents, organizing administrative protests, appealing to the Interior Board of Land Appeals, litigating, and educating the public. The Center is specifically engaged in advocacy for the sage-grouse in Idaho including commenting and administratively protesting both oil and gas issues as well as the proposal for the Caldwell Canyon phosphate mine in Idaho. In 2018, the Center repeatedly commented on and protested a since-deferred oil and gas lease sale proposed near Grays Lake National Wildlife Refuge.

12. Additionally, the Center has been involved with protecting bighorn sheep, specifically in connection to the Sheep Station. In 2007, the Center and WWP filed a lawsuit before this Court challenging the operation of the Sheep Station without proper environmental analysis. The lawsuit detailed how the grazing of domestic sheep threatened the health of nearby bighorn sheep which are susceptible to disease transmission from domestic sheep. The lawsuit also expressed concern about negative impacts to grizzly bears, Canada lynx, and wolves from the Sheep Station's operations and associated grazing activities. The lawsuit was quickly settled when ARS agreed to complete an environmental analysis and agreed to consult with FWS pursuant to the ESA. That environmental analysis is the one the Center is challenging in this case.

13. The Center's work on the Sheep Station has continued through to the present lawsuit. Following settlement of the 2007 lawsuit, the Center remain engaged by submitting substantive comments through all stages of the NEPA process. In fact, the Center has submitted

at least four sets of comments on this NEPA process, detailing concerns regarding the Sheep Station's effects on grizzly bears, bighorn sheep, sage-grouse, and other native wildlife, and asserting legal violations.

14. Center staff and members include many individuals who reside in, explore, and enjoy the native species and ecosystems of the Intermountain West, including areas in and around the Centennial Mountains, where grizzly bears, sage-grouse, and bighorn sheep are found.

15. The Center continues to believe the Agricultural Research Station has not complied with the law and that the activities of the Sheep Station continue to be detrimental to native wildlife, including grizzly bears, bighorn sheep, and sage-grouse. The Center's staff and members, including myself, are injured by the illegal operation of the Sheep Station. The decision to continue operations based on the misleading, inaccurate, and unlawful 2017 EIS and 2018 ROD challenged here injure the Center and its staff and members, including myself. We rely on federal agencies, including Defendants here, to comply with NEPA and candidly and accurately evaluate and disclose adverse impacts of the Sheep Station's domestic sheep grazing upon the public lands and imperiled wildlife, including grizzly bear, bighorn sheep, sage-grouse, and other species. We are harmed by the failure and refusal of the Sheep Station to carry out that kind of NEPA-compliant analysis here, and by the Sheep Station's determination to continue sheep grazing practices based on that unlawful analysis. The Sheep Station has used its inaccurate, misleading, and unlawful EIS to reject alternatives that would limit or close Sheep Station grazing in vital habitats for sensitive wildlife, including grizzly bear, bighorn sheep, and sage-grouse, among others. A favorable decision ordering the Sheep Station to comply with NEPA would redress these injuries, because the Sheep Station would have to take hard look at

the potential impacts of its operations and consider mitigation and alternatives that have less of an impact on the environment.

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

Executed this 18th day of December, 2019 in Victor, Idaho.



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Andrea Santarsiere