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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 GARRISON  
TODD**

I, GARRISON TODD, 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. I am co-counsel for the Plaintiffs in this case.
2. On July 16, 2019, Defendants lodged the initial Administrative Record with the Court. Subsequently, on behalf of Plaintiffs, I corresponded with Assistant U.S. Attorney Christine England, counsel for Defendants, regarding the contents of the Administrative Record. One item that Plaintiffs requested was data on the size of the Sheep Station herd.

3. On August 21, 2019, Ms. England provided some supplementary documents requested by Plaintiffs. One file included in that response was the Sheep Station's sheep inventory from 2009–2019. A true and correct copy of that inventory, as provided by Ms. England, is attached hereto as Exhibit A.

4. In the revised Administrative Record lodged with the Court on November 26, 2019, that file was replaced with the sheep inventory from 2006–2016, as that is the data which was available at the time of the EIS at issue here, which was released in July 2017.

5. Because the data regarding the Sheep Station's sheep inventory in 2017-2019 is relevant to Plaintiffs' claims challenging the EIS as well as the subsequent July 2018 Record of Decision and other documents, Plaintiffs are submitting the 2009-2019 inventory with this declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed the 5th day of December, 2019, at Boise, Idaho.



Garrison Todd

**EXHIBIT A:  
2009 – 2019 Sheep Station Inventory**

Count by year of University of Idaho total mature sheep<sup>a</sup> managed  
at the USDA, ARS, U.S. Sheep Experiment Station

Year	Mature Sheep <sup>a</sup> , n
2009	3,440
2010	3,405
2011	3,069
2012	3,064
2013	2,025
2014	1,685
2015	1,578
2016	1,810
2017	2,070
2018	2,304
2019 <sup>b</sup>	2,400

<sup>a</sup> In accordance with the U.S. Sheep Experiment Station Grazing and Associated Activities Project – Final Environmental Impact Statement (2017), page 36, a mature sheep is a ewe or ram that is sexually mature and retained as a part of the core breeding flock.

<sup>b</sup> Predicted mature sheep count ( $\pm$  250). Final breeding flock selections will be made in October, 2019.