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**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF IDAHO**

WESTERN WATERSHEDS PROJECT,  
et al.,

*Plaintiffs,*

v.

DAVID BERNHARDT, Acting  
Secretary of Interior; JOSEPH R.  
BALASH,\* Assistant Secretary of  
Interior; BUREAU OF LAND  
MANAGEMENT; and U.S. FOREST  
SERVICE,

*Defendants.*

Case No. 1:16-cv-00083-BLW

**DECLARATION OF  
PATRICK DONNELLY**

*\* Official Defendant automatically substituted  
per Fed. R. Civ. P. 25(d)*

I, Patrick Donnelly, declare as follows:

1. The following facts are personally known to me, and if called as a witness

I would and could truthfully testify to these facts.

2. I have been a member of the Center for Biological Diversity (“the Center”) since 2006.
3. I currently live in Pahrump, Nevada, where I have resided since 2018.
4. I attended the University of California, Berkeley, and I have a bachelor’s of science in Conservation and Resource Studies. Desert ecosystems were my particular area of interest.
5. Since 2017, I have been the Center’s Nevada State Director. My role is to advocate for the protection of wildlife, public lands and groundwater in Nevada.
6. I have visited Bureau of Land Management-managed public lands within the greater sage-grouse planning areas on numerous occasions.
7. I visited Monitor Valley in Central Nevada in 2016, 2017, and 2018, to view greater sage-grouse habitat and leks, to hike, camp, photograph, and for spiritual renewal. I have specific plans to return to Monitor Valley on May 5, 2019. My favorite campsite in Monitor Valley is at Mosquito Creek. Below are two photographs I took during recent visits to the Monitor Valley, the first of a group of Center staff on an early-morning lek-viewing trip, and the second of a male greater sage-grouse.



8. I visited Spring Valley in eastern Nevada in 2006, 2017, and 2018, to view greater sage-grouse habitat, to hike, camp, photograph, and for spiritual renewal. I have

specific plans to return to Spring Valley in June 2019. The following is a photograph of the Spring Valley I took during one of these recent visits.



9. I visited the Huntington Valley on the west side of the Ruby Mountains in 2017 and 2018, to view greater sage-grouse habitat and to hike, photograph, and for spiritual renewal. I have specific plans to return to Huntington Valley in July 2019. I took the following photograph of Huntington Valley during one of these visits.



10. I visited the upper Reese River Valley on the west side of the Toiyabe Range in summer 2018 to view greater sage-grouse habitat and to hike, photograph and for spiritual renewal. I plan to return there within the next two years. The following is a photograph of the Reese River Valley I took during that 2018 trip.



11. I visited the upper White River Valley in eastern Nevada on numerous occasions in 2017 and 2018, to view greater sage-grouse habitat, and to hike, photograph, soak in hot springs, and for spiritual renewal. I have specific plans to return to this area in June of 2019. The following is a photograph of the White River Valley I took during one of these recent visits.



12. I have visited the area around the ghost town of Metropolis northwest of Wells to view greater sage-grouse habitat, and hike, photograph, explore historic relics, soak in hot springs, and for spiritual renewal. I have specific plans to return to this area in July of 2019. The following is a photograph I took of the ghost town on one of my visits.



13. In each of these areas, I have derived tremendous personal pleasure and professional benefit from viewing and experiencing unbroken, undisturbed greater sage-grouse habitat. Seeing the greater sage-grouse lekking is one of the highlights of my life. I also enjoy photographing landscapes, wildlife such as greater sage-grouse, and water

features. I am a semi-professional photographer, and have sold several prints of my Nevada photography.

14. I plan on visiting Monitor Valley specifically for greater sage-grouse lek viewing in May of 2019, eastern Nevada including Spring Valley and the White River Valley in June of 2019, and the greater Ruby Mountains area including Huntington Valley and the Metropolis area in July of 2019.

15. I plan to regularly return to these sage-grouse areas in Nevada in coming years about as frequently as I have in recent past years, in order to observe and enjoy being with sage-grouse and other native birds and wildlife in the sagebrush-steppe ecosystem.

16. I am interested in seeing the permanent conservation of greater sage-grouse habitat because the wildlands of the Great Basin are our national natural heritage. The sagebrush ecosystem in which the greater sage-grouse thrives is home to more than 350 species which I enjoy including pygmy rabbits, rare and endemic aquatic species, mule deer, and raptors. The sagebrush ecosystem provides a vital carbon sink, and since I am worried about climate change, it is important that we maintain intact habitat for its carbon absorbing capabilities. The sagebrush ecosystem also provides me with outstanding recreational opportunities which would be jeopardized by the same development which would threaten the greater sage-grouse.

17. It is my understanding that the Bureau of Land Management has recently finalized its 2019 Amendments to the 2015 Greater Sage-Grouse Plans. The 2015 Plans provided important habitat protections to the public lands that I love best, and the current

administration's attempt to weaken these plans causes me irreparable aesthetic, recreational, scientific, and spiritual injury.

18. For instance, if the new amendments are allowed to go into effect, key protective restrictions on oil and gas development in Nevada's sage-grouse habitat would be weakened or eliminated. This places at great risk the lease parcels within greater sage-grouse Priority Habitat Management Areas in the Monitor Valley, which were recently sold as part of BLM's June 2018 Nevada oil and gas lease sale. There is also active oil and gas leasing in Huntington Valley, White River Valley, Spring Valley, Reese River Valley, and in the Metropolis area. In Spring Valley, energy development has already marred the landscape and potentially interfered with sage-grouse life cycles.

19. Additionally, the relaxation of protections for greater sage-grouse would threaten the sagebrush ecosystem from the perils of mining, potentially jeopardizing wildlife populations that I enjoy experiencing, such as mule deer. Mining has already caused extensive alteration to places within the greater sage-grouse planning area. Adjacent to the Ruby Mountains, the Bald Mountain Mine has caused very serious impacts to mule deer migration corridors across sagebrush habitat. Mining is also an active threat to sagebrush habitat in the Huntington Valley, an area where I regularly recreate.

20. In sum, allowing BLM to proceed with stripping away protections from the greater sage-grouse conservation plans would cause irreparable harm to Nevada's sage-grouse populations, sagebrush ecosystems, and my own interests in these natural resources. The lack of these protections will result in inappropriate development that will materially affect my aesthetic and spiritual experience of these special lands.

21. A ruling by the Court that BLM violated the law in adopting the 2019 plan amendments and enjoining those amendments from taking effect will help ensure that BLM fully and fairly discloses the impacts of its sage-grouse management activities to the public and follows the best available science, and will prevent irreparable harm to sage-grouse and my own interests, as well as other CBD staff and member interests, that will otherwise occur if this Administration moves forward to implement the weakened sage-grouse plans through new approvals of oil and gas leasing and development in Nevada and other states in the sage-grouse range where I frequently visit in hopes of viewing and enjoying sage-grouse in their natural habitats.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th day of April, 2019, in Carson City, Nevada.

/s/ Patrick Donnelly  
Patrick Donnelly