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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

<p>WESTERN WATERSHEDS PROJECT, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>SALAZAR, et al.,</p> <p>Defendants.</p>	<p>CV-09-159-M-CCL</p> <p>DECLARATION OF KENNETH COLE</p>
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DECLARATION OF KENNETH COLE

Pursuant to 28 U.S.C. Sec. 1746, I, Kenneth Cole, hereby declare under penalty of perjury that the following is true and correct:

1. My name is Kenneth Cole. The following facts are personally known to me, and if called as a witness I could and would truthfully testify thereto.
2. This declaration addresses my long held interest in bison, their protection, and how the current management policies of bison and sagebrush obligate species adversely harms my interests.

INTRODUCTION AND BACKGROUND

3. I currently reside in Boise, Idaho.
4. I have a long background of wildlife advocacy that includes involvement in wolf recovery, fisheries enhancement, bison recovery, sagebrush obligate species recovery, and habitat protection.
5. I have a bachelor's degree in biology from Idaho State University.
6. From 2000 to 2008, I worked for Idaho Department of Fish and Game (IDFG) as a fisheries technician. My responsibilities with IDFG included: (1) establishing a locally-adapted brood population of B-Run steelhead on a tributary of the Upper Salmon River; (2) processing Chinook salmon at salmon traps; collecting biological information and samples from salmon; setting tags and recovering tag information; conducting creel surveys at check stations; conducting redd counts; and operating smolt screw traps; and (3) conducting a fin-ray aging study for Snake River Chinook salmon; and extracting and reading coded wire tags from Chinook and steelhead.
7. Since 2008, I have been employed as the NEPA Coordinator for Western Watersheds Project. My duties for WWP include participating in the public comment process for livestock grazing allotments and other agency decisions across Nevada and Idaho, writing many comments, protests and appeals. I am also a member of WWP.
8. During a portion of 2005 I held a post on the Board of Directors of the Wolf Recovery Foundation.
9. I am an active blogger and editor on Ralph Maughan's Wildlife News blog. This entails writing commentary on environmental issues affecting western lands and wildlife, grazing issues and stories concerning wildlife conservation. I have written many stories about bison and bison management.

10. I am also an avid photographer. I regularly travel around the West to take photographs of the wildlife and scenery I observe. I particularly enjoy taking photographs of bison, native fish, wildlife, and plants that I often use to illustrate various stories on the blog. I often post my photos on-line where I can share them with my friends and family.
11. Since December of 2001 I have been a volunteer for the Buffalo Field Campaign and have frequently traveled to the Yellowstone region to view and photograph wildlife, particularly bison.
12. Since 2005 I have held a post on the board of directors of the Buffalo Field Campaign, based in West Yellowstone, Montana.
13. During my years of involvement with the Buffalo Field Campaign I have witnessed and opposed many occurrences of hazing, capture, and slaughter by the Montana Department of Livestock with the participation of the IBMP partners including the National Park Service and the US Forest Service.
14. I have used many of the lands and allotments on the Gallatin National Forest for the purpose of finding peace and solitude, observing and photographing bison and other wildlife. I intend to return to these lands on an annual basis into the foreseeable future.
15. During my travels to the Gallatin National Forest I have enjoyed using the Sheep Mile Allotment, South Fork Allotment, Watkins Creek Allotment, Horse Butte Allotment, Duck Creek Allotment, Wapiti Allotment, and the Cache Eldridge Allotment. I have also thoroughly explored Forest Service lands in the Hebgen Valley and near Gardiner, Montana.
16. I have observed bison on the Horse Butte Allotment, Duck Creek Allotment, and the South Fork Allotment.
17. I have commented on the permit renewal process for the Watkins Creek and South Fork Allotments.
18. Since I was a child I have visited Yellowstone National Park and the Gallatin National Forest for the purpose of wildlife viewing and photography. I have enjoyed seeing bison and other wildlife on their native landscape and oppose the IBMP and believe that it does not adequately address the needs of bison and their free roaming nature on public lands inside and outside Yellowstone National Park and on the Gallatin National Forest.
19. I have a strong desire to see a wild, free-roaming population of bison on the Gallatin National Forest that can freely migrate to native lands from Yellowstone National Park and I am dismayed that the Gallatin

- National Forest has not examined the possibility of such or given the public the opportunity to comment on this possibility under NEPA.
20. I am very dismayed that the Gallatin National Forest has not adequately considered the impacts of its management, which favors livestock, over the viability of bison on National Forest lands as it is required to do under NFMA and hope that it will do so in the very near future.
21. Similarly, I am also dismayed that the Gallatin National Forest has not adequately considered the impacts of its management, which favors livestock, over the viability of sagebrush obligate species, such as sage grouse, on National Forest lands as it is required to do under NFMA and hope that it will do so in the very near future.

Executed this 30th day of June, 2010.

A handwritten signature in cursive script that reads "Ken Cole". The signature is written in black ink on a white background.

Kenneth Cole