

Exhibit 7  
in support of  
Appellants' Motion to Expedite and Consolidate Proceedings in  
*Ctr. for Biological Diversity et al. v. Salazar et al.*,  
Civ. No. 11-35670  
(Declaration of Josh Laughlin)



I, JOSH LAUGHLIN, declare as follows:

1. I have lived in Eugene, Oregon for 18 years.
2. I am the Campaign Director of Cascadia Wildlands, a non-profit conservation organization based in Eugene, Oregon. I have worked with Cascadia Wildlands since 2001 in various conservation positions, including as the Executive Director. I am also a dues-paying member of the organization.
3. Cascadia Wildlands has approximately 4,500 supporters and members across the country who are interested in and support Cascadia Wildlands' work to protect and restore the ecosystems and species of the Cascadia bioregion. The gray wolf is of particular interest to our membership as well as to me, as it is currently making a comeback in Oregon after being systematically exterminated from the state nearly 65 years ago.
4. Cascadia Wildlands and its members derive substantial benefits from the existence of wolves. We recognize the importance of having this top-level carnivore back on the landscape as well as simply appreciating the intrinsic value of the species. Our members have expressed excitement about the prospect of seeing a wolf in Oregon or hearing its howl in the backcountry. Some of our members live in northeast Oregon near where the wolves currently reside. Other members, such as me, live in western Oregon and await the day that wolves cross into the Cascades.

5. Since its inception in 1998, Cascadia Wildlands has advocated for wolf recovery, as endangered species recovery is of paramount importance to our organization and membership. Recognizing that wolves would soon migrate into Oregon after being federally reintroduced in 1995 and 1996 into Yellowstone National Park and in central Idaho, we began campaign planning to help facilitate recovery in the state. Today, Oregon has two packs of confirmed wolves, the Innaha Pack and the Wenaha Pack. These packs are made up of approximately 23 individuals.

6. Educating the public and our membership about gray wolf recovery, and threats to the species, is part of our efforts to restore wolves throughout the West. We regularly feature gray wolves in our quarterly newsletter, *Cascadia Quarterly*, through our monthly electronic bulletins to our supporters and members and on our website, [www.cascwild.org](http://www.cascwild.org). In March and April 2011, Cascadia staff testified in front of the House Natural Resources Committee in the Oregon Legislature about bills affecting gray wolf recovery in the state. In April 2011, Cascadia staff hosted two wolf outreach events that turned out a combined 100 community members. One of the events featured a prominent gray wolf biologist who has been a central researcher on the species in Yellowstone National Park.

7. Cascadia Wildlands has closely followed the recovery progress of the gray wolf in the Rockies over the past 10 years, recognizing a robust and

Endangered Species Act-protected wolf population in Idaho, Montana and Wyoming would help facilitate dispersal into Oregon and other adjacent states. We were party to a number of successful lawsuits challenging both the Bush and Obama administrations' proposals to prematurely delist the species from the federal Endangered Species Act and transfer management of the gray wolf to the various states in the northern Rockies.

8. Our successful legal challenges to the administrations' delistings appeared to compel senior politicians from the Rockies to pursue delisting through an act of Congress. On April 14, 2011 Congress successfully attached a rider onto the budget bill that required the U.S. Fish and Wildlife Service to delist wolves in the northern Rockies from the Endangered Species Act. In response, on May 5, 2011, the U.S. Fish and Wildlife Service reissued the April 2, 2009 final rule delisting the gray wolf ("Delisting Rule").

9. The Delisting Rule removes Endangered Species Act protection from gray wolves in the northern Rocky Mountains. In particular, gray wolves in Montana and Idaho, as well as portions of eastern Oregon, eastern Washington, and north-central Utah are now state managed and subject to increased persecution from government agents, private landowners, and hunters and trappers.

10. To our organization's knowledge, this is the first time Congress has delisted a species legislatively. We believe it sets an egregious precedent that

essentially says it is okay to take a species off the list when it is convenient for Congress rather than when it is genuinely recovered.

11. The delisting has had immediate impacts for wolves in Oregon since the eastern 1/3 of the state is considered in the northern Rockies delisting area. In mid-May, two wolves in eastern Oregon were trapped and killed after a series of livestock depredations. We expect a continued heavy-handed response to livestock depredations in eastern Oregon due to the federal delisting, even though there are only 23 wolves in the state.

12. Moreover, we anticipate sport hunts for gray wolves in Montana and Idaho this fall. On May 12, Montana tentatively set its kill quota at 220 wolves. Idaho has yet to identify a number, but we expect a number as large, if not larger.

13. Seeing wolves in the backcountry is something that I've strived for as a nature enthusiast. In 2001, I went on a four-day canoe trip down the North Fork Flathead River on the west side of Glacier National Park in Montana. Our group was fortunate enough to witness wolves on the bank while floating down the river. This was an exceptional experience that I will never forget. My three-year old daughter has a fascination for wolves, and when she gets a little older, I have told her we will take this same trip down the North Fork Flathead to float and look for wolves.

14. In 2007, a friend and I spent a week backpacking through the Eagle Cap Wilderness in northeast Oregon with the hopes of catching a glimpse of a wolf or the howl in the backcountry. While we didn't witness any wolves, the Imnaha Pack is known to inhabit parts of this wilderness and the surrounding area and the knowledge that wolves inhabit the area enriched my experience.

15. My experience in Oregon's backcountry will be greatly enhanced by the possibility of seeing or hearing wolves. I am planning on going back to the Eagle Cap Wilderness or the Wenaha-Tucannon Wilderness in eastern Oregon (where the Wenaha Pack lives) this summer with the intention of seeing or hearing Oregon's wolves. Cascadia Wildlands is also considering offering a "wolf watching" trip to northeast Oregon this year for its members with the intention of locating the wolves in the backcountry.

16. My and Cascadia Wildlands' future enjoyment of gray wolves throughout the West is being, and will continue to be, irreparably harmed by the Delisting Rule.

17. The reissuance of the Delisting Rule makes it less likely that I will again see a wolf in the wild. Since the delisting occurred, two wolves in Oregon have already been killed and hundreds of wolves will likely be killed in Montana and Idaho this fall.

18. The loss of any wolves under state management impacts my ability to seek them out and otherwise enjoy them and would substantially decrease the enjoyment I receive from recreating in the forests of the northern Rocky Mountains. In addition, when wolves are killed in the northern Rockies, it makes it less likely that wolves will disperse into the Cascades to inhabit the forests closer to my home.

19. The reissuance of the Delisting Rule will also harm me by lessening the positive effect of wolves on their ecosystem. Those effects include keeping ungulate herds healthy, providing carrion for scavenger animals and providing respite to riparian trees grazed on by sedentary elk. I am harmed through the degradation of these ecosystems, many of which I have explored and intend to return to.

20. In sum, my professional and personal interests in the protection of gray wolves are being greatly harmed by the U.S. Fish and Wildlife Service's reissuance of the Delisting Rule. The killing of wolves that is just beginning to be carried out under the newly-granted authority of state governments is depriving me of the benefits that I have long enjoyed through recreating in gray wolf habitats in northeast Oregon and elsewhere in the northern Rockies with the hope of observing wolves, and also of the enjoyment I receive from the very existence of these rare animals.



21. If the Court holds that the Delisting Rule is illegal, gray wolves in the northern Rockies would once again be protected under the Endangered Species Act, which is key to ensuring that my interests in gray wolves are preserved and remain free from injury.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 23, 2011 in Eugene, Oregon.

A handwritten signature in black ink that reads "Josh Laughlin". The signature is written in a cursive, flowing style.

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Josh Laughlin