

Exhibit 8
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 Kenneth Cole)

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

ALLIANCE FOR THE WILD
ROCKIES, et al.,

Plaintiffs,

vs.

KEN SALAZAR, et al.,

Defendants.

CV 11-70-M-DWM
CV 11-71-M-DWM

DECLARATION OF KENNETH
COLE

CENTER FOR BIOLOGICAL
DIVERSITY, et al.,

Plaintiffs,

vs.

KEN SALAZAR, et al.,

Defendants.

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 wolves, their protection, and how the delisting of Northern Rocky Mountain gray wolves will adversely harm my interests.

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, 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. Since 2005 I have held a post on the board of directors of the Buffalo Field Campaign, a bison advocacy group, based in West Yellowstone, Montana.

9. While employed with various agencies and contractors I was stationed in areas where I was able to interact with, study, and frequently observe wolves in Central Idaho. Also as part of my current job, I travel extensively in Idaho, Nevada, and Montana viewing landscapes, range conditions, and wildlife.

10. I am an active blogger and editor on The 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 wolves and wolf management.

11. 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 wolves, native fish, wildlife, and plants, which 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.

12. I have a particular love of wolves, and the condition of wolf populations has been a longstanding interest of mine. I enjoy seeing and photographing them in their natural environment and I particularly enjoy watching them in Idaho. I have been fortunate to see them in various areas of Idaho, Montana, and Wyoming.

13. I also greatly enjoy traveling to the Frank Church Wilderness for the purpose of finding peace and solitude, observing wolves, photographing wolves, howling for wolves and searching for tracks or other sign.

14. My interest in wolf recovery started at a young age while accompanying my father on yearly trips to Yellowstone National Park during the late 1970's where we often discussed wildlife and the fact that wolves were absent from the Park. We participated in a survey that asked about our use of the Park and what improvements if any we thought should be made. I distinctly remember writing that we felt that wolves needed to be reintroduced to the Park.

15. The first experience that I had with a wolf was while I was stationed at the former USFS Landmark Ranger Station on Johnson Creek just west of the Frank Church Wilderness in 1992. Early one morning I was awakened by the howls of coyotes and what I think was a wolf in response. There had been several reports of wolves in the area during that time.

16. In subsequent years I followed news stories about the possible reintroduction of wolves to Central Idaho and Yellowstone National Park. In 1995 the first wolves were reintroduced in front of cameras in Central Idaho and Yellowstone National Park. At that time I began searching for information about what was happening to the wolves and I discovered Ralph Maughan's Wolf News web page, now named The Wildlife News.

17. I first observed a wolf in the wild when I made a special trip to the National Elk Refuge in the winter of 1998/1999 and was able to watch 3 wolves hunting elk there. It was a profound experience for me because it had been a lifelong goal to see a wolf in the wild.

18. On several occasions since then I have taken special trips to observe wolves in Yellowstone National Park where I have been fortunate to observe wolves and provide opportunities to friends and family to view them as well.

19. During this same time I made many attempts to view wolves in

Idaho, my home state, but was unsuccessful.

20. In the spring of 2002, while working for the IDFG, I was stationed at the East Fork Salmon River fish trap where I conducted surveys of fishermen on the Main Salmon River and helped operate a fish trap and pond on Squaw Creek, a tributary of the Main Salmon River near Clayton, Idaho. I was excited because I knew, from information on Ralph Maughan's website, that there was a wolf pack named the Whitehawk Pack that inhabited the area. Unfortunately, on the morning of April 6, 2002, I witnessed the Wildlife Services spotter plane and helicopter in the process of gunning down the Whitehawk Pack. I was very disturbed by these actions and was disappointed that my chances of viewing a wolf had been severely diminished.

21. It wasn't until the following spring of 2003 that I was able to observe and hear wolves in Idaho. The experiences I had were the foundation for many efforts on my behalf to help protect the Buffalo Ridge Pack, which established a territory in the area around Clayton, Idaho. On several occasions I was able to observe, track, and howl for wolves in the Squaw Creek Drainage.

22. I was stationed at this location for several months each spring from 2003 to 2007. On several occasions during my time stationed here, I

observed wolves at the fish pond that I was charged with tending and I was able to show my father and my future wife wolves while they were visiting me.

23. Because of my personal interest in wolves and my professional experience as a biologist, I have participated in various wolf management efforts. For instance, I helped with testing of turbo-fladry, a non-lethal technique to try and keep wolves away from livestock to prevent conflicts. I have also helped agency personnel trap and collar a wolf. This wolf was later killed by Wildlife Services after it was implicated in the killing of livestock.

24. I have attended 2 sessions of the North American Wolf Conference, which was annually hosted by the Wolf Recovery Foundation and Defenders of Wildlife.

25. I have also been involved in many conversations with wolf managers and review as much of the publicly available information on wolves as I can. For example, I am familiar with the Idaho Wolf Conservation and Management Plan, and I consistently review the Idaho Wolf Recovery Progress Reports as they become available.

26. I have also written many stories about wolves and wolf management for Ralph Maughn's Wildlife News blog. For example, on

February 3 of 2010 I posted a story about the first decline in Idaho's wolf population since the reintroduction. I have also posted stories about the relisting of wolves and the reactions it has provoked, stories about wolf control proposals by the Idaho Department of Fish and Game, stories about wolf control and wolf control proposals by USDA Wildlife Services, a video of wolves I observed in July, 2010, and a story about the August 16, 2010 Idaho Fish and Game commissioner's meeting where wolves were a main topic of discussion. Writing these stories increased my knowledge of wolf biology and my familiarity with wolf management practices in Idaho.

27. I have frequently sought information about wolf management in Idaho through public information requests to the Idaho Department of Fish and Game and through FOIA requests to Wildlife Services and the US Fish and Wildlife Service.

28. I am also familiar with wolf management and recovery in Montana and Wyoming, particularly in the areas in and around Yellowstone National Park. I have followed wolf recovery efforts in these states for many years through media and official reports, such as the Montana and USFWS weekly and annual reports, and have written stories about items of particular interest such as the proposal to kill wolves in the Bitterroot Mountains.

29. In Montana and Wyoming, I visit Yellowstone National Park and surrounding areas such as the Gallatin National Forest regularly. I have observed wolves and wolf sign, as well as heard them howl, on several occasions inside and outside of Yellowstone National Park.

30. I intend to travel to West Yellowstone and Yellowstone National Park in the month of June 2011 to recreate, look for wolves and their sign, and visit friends for a wedding and the memorial service of a friend. I also regularly travel to West Yellowstone to attend board meetings of the Buffalo Field Campaign. While there I make a point of visiting areas nearby and Yellowstone National Park in search of wolves. I intend to continue traveling to the area regularly for the foreseeable future.

31. I also intend to travel to central Idaho where I recreate and look for wolves and their sign on a regular basis. My family owns a home in Cascade, Idaho, which we visit on a regular basis and which provides a convenient central location for day hikes in the nearby Boise and Payette National Forests.

32. My interests in wolves and their recovery, and my efforts to protect wolves and their habitat, will be harmed by the delisting of the Northern Rockies population. These harms will continue unless the court grants the relief requested by the plaintiffs.

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

Executed on this 27th day of May, 2011 at Boise, Idaho.

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

Kenneth Cole