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Attorneys for Plaintiff

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

ALLIANCE FOR THE WILD
ROCKIES

Plaintiff,

CV-11-76-M-CCL

vs.

**SECOND DECLARATION OF
STEPHANY SEAY**

UNITED STATES DEPARTMENT
OF AGRICULTURE, et al.,

Defendants,

and

BILL MEYERS, individually,

Intervenor.

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

1. I am a Montana resident and live part of the year in Moiese, Montana and part of the year in West Yellowstone, Montana.
2. I have worked as the Media Coordinator for the Buffalo Field Campaign for eight years, since 2004, and continue to work in that position. I also volunteer with the Buffalo Field Campaign each year to monitor and document bison management operations in the Greater Yellowstone Area.
3. On Wednesday, May 9, 2012 I took the following unaltered photographs of the Interagency Bison Management Plan helicopter hazing operation in Hebgen Basin, Montana. Hazing operations began on some private lands, continued through the Gallatin National Forest and into Yellowstone National Park.
4. Photograph 1 shows a Montana Department of Livestock helicopter hazing wild bison off of private property owned by the Galanis family. There are never any cattle on the Galanis family property. This property is designated as the Yellowstone Ranch Preserve for bison. The Montana Department of Livestock hazes bison off of the property despite the landowners' desire to allow bison to graze there. The white signs mark the boundary between the Galanis private property and Gallatin National Forest.



PHOTOGRAPH 1

5. Photograph 2 shows a Yellowstone National Park ranger in the background and Montana Department of Livestock employee Mark Anderson's horse is seen in the foreground. This picture shows the Gallatin National Forest, just

east of the Horse Butte peninsula. Bison are being pushed east towards GNF-FS Road 6697.



PHOTOGRAPH 2

6. Photograph 3 shows the bison hazing operation proceeding east towards GNF-FS Road 6687 and the Northwest Madison River bluffs. This picture shows a U.S. Forest Service law enforcement officer who is following the hazing operation on the Gallatin National Forest. In the background to the left, there is one Montana Department of Livestock rider, and in the middle, one Yellowstone National Park ranger/rider.



PHOTOGRAPH 3

7. Photograph 4 shows a Forest Service law enforcement vehicle behind a Yellowstone National Park law enforcement vehicle, on Gallatin National Forest FS-Road 6697, heading east towards Highway 191. In the background, above the Forest Service truck is the Montana Department of Livestock helicopter, abetting riders (two DOL riders seen) in hazing up to 280 wild American buffalo.



PHOTOGRAPH 4

8. Photograph 5 shows a Forest Service law enforcement vehicle in the foreground, a Montana Department of Livestock helicopter just above the tree-line, and one Montana Department of Livestock rider, hazing wild buffalo down Gallatin National Forest FS-Road 6697, east towards Highway 191.



PHOTOGRAPH 5

9. Photograph 6 shows USDA-Animal & Plant Health Inspection Service (APHIS) employee Becky Frey hazing wild buffalo, on Gallatin National Forest. Haze is heading east of Horse Butte and is located between GNF FS Road 6697 and the Northwest Bluffs of the Madison River.



PHOTOGRAPH 6

10. Photograph 7 shows the same general area as photograph 6, but also shows a pregnant wild buffalo more clearly that is being hazed by USDA-APHIS employee, Becky Frey.



PHOTOGRAPH 7

11. Photograph 8 shows Forest Service law enforcement in the foreground, with Yellowstone National Park law enforcement in the background, and a Montana Department of Livestock helicopter hazing wild buffalo on Gallatin National Forest, along FS Road 6697, heading east towards Highway 191.



PHOTOGRAPH 8

12. Photograph 9 shows USDA-APHIS employee Becky Free hazing wild bison mothers and calves on Gallatin National Forest, FS Road 6697, east towards Highway 191.



PHOTOGRAPH 9

13. Photograph 10 shows six IBMP agency riders representing Montana Fish, Wildlife & Parks (3), Yellowstone National Park (1), and Montana Department of Livestock (DOL), pausing during a haze of wild bison on Gallatin National Forest, FS Road 6697. The haze was paused for two reasons: 1) One rider (presumably FWP) had a horse collapse due to colic and had to be medicated and taken to veterinarian. Gallatin National Forest law enforcement gave the DOL helicopter permission to land on Gallatin National Forest to drop off medication (banamine) for the mare; 2) the buffalo had been hazed nonstop and were exhausted, thirsty and hungry, and were not moving for the riders. After the DOL helicopter dropped off the banamine one-half mile west from this position, the helicopter returned.



PHOTOGRAPH 10

14. Photograph 11 shows the helicopter returning and flying low and using rotors to move the air and bring up dust, rocks, and other debris to force the buffalo to move.



PHOTOGRAPH 11

15. Photograph 12 shows a rider from Yellowstone National Park (left), Montana Department of Livestock (middle), and Montana Fish, Wildlife & Parks (right), along with DOL helicopter hazing wild bison east towards highway 191, on Gallatin National Forest, FS Road 6697.



PHOTOGRAPH 12

16. Photograph 13 shows wild bison being hazed on Gallatin National Forest land, west of Highway 191 and just east of Yellowstone National Park's western boundary. This picture shows a Yellowstone National Park rider in the right background, DOL rider Mark Anderson in the left background (on palamino) just coming out of the trees, and in the foreground is DOL livestock inspector/rider Bridger on the paint.



17. Photograph 14 shows two Forest Service law enforcement vehicles in the foreground, on a FS road, east of Highway 191, along the Madison River bluffs and right at the edge of Yellowstone National Park. The FS LEO truck on the left was with me during the entire hazing operation on FS 6697. In the background is a MDOL rider just on the edge of Yellowstone National Park's boundary, hazing wild buffalo into the Park, while the DOL helicopter is inside Yellowstone National Park hazing bison.



18. Photograph 15 shows two Buffalo Field Campaign volunteers, inside Yellowstone National Park documenting the government bison hazing

operation on public land. They are being approached by seven IBMP riders, who participated in the entire hazing operations on Gallatin National Forest. The IBMP riders represent: USDA-APHIS (2); MDOL (1); MFWP (3); YNP (1).



PHOTOGRAPH 15

19. Photograph 16 shows Buffalo Field Campaign volunteers documenting the hazing operation as it continues into Yellowstone National Park, along the Northeast bluffs of the Madison River. The individuals hazing the buffalo in Yellowstone include the MDOL's helicopter, and riders from the USDA-APHIS (2); FWP (1); NPS (1); DOL (1).



PHOTOGRAPH 16

20. Photograph 17 shows the haze continuing inside Yellowstone National Park, along the Northeast bluffs of the Madison River. The six riders seen represent: USDA-APHIS (2 riders); Yellowstone National Park (2 riders); Montana Fish, Wildlife & Parks (1 rider); Montana Department of Livestock (1 rider).



PHOTOGRAPH 17

21. Buffalo Field Campaign has compiled video footage of the helicopter hazing operations on May 9, 2012. This footage is available online at http://www.youtube.com/watch?v=y9Yklq469hs&list=UUIRWaQWXjK1RXc6_hG-kZzQ&index=1&feature=plcp. This video footage at 1:54 – 2:13 documents fresh grizzly bear tracks along the Madison River corridor while helicopter hazing is ongoing in the same area and can be heard in the background. The video footage at 2:23-2:38 documents an interview with a Forest Service employee who says he saw a grizzly bear in the area: “grizzly...saw him twice this morning”

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11 Day of May 2012.

A handwritten signature in blue ink that reads "Sf Seay". The signature is written in a cursive style and is positioned above a horizontal line.

Stephany Seay, Media Coordinator

Buffalo Field Campaign