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**FILED**

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ANGIE SPARKS, Clerk of District Court  
By  Deputy Clerk

*Attorneys for Plaintiffs*

MONTANA FIRST JUDICIAL DISTRICT COURT  
LEWIS AND CLARK COUNTY

RIKKI HELD, et al.,  Plaintiffs,  v.  STATE OF MONTANA, et al.,  Defendants.	Cause No. CDV-2020-307  Hon. Kathy Seeley  <b>DECLARATION OF OLIVIA VESOVICH IN SUPPORT OF PLAINTIFFS' RESPONSE BRIEF IN OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT</b>
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Pursuant to MCA §1-6-105, Olivia Vesovich hereby declares as follows:

1. I am a Plaintiff in the above-entitled action. I am making this declaration in support of Plaintiffs' Response Brief in Opposition to Defendants' Motion for Summary Judgment. I have personal knowledge of the facts I state herein and if called to testify, I would and could testify competently thereto.
2. I am a nineteen-year-old citizen of the United States and resident of Missoula, Montana. I was born and raised in Missoula.
3. I am deeply harmed and worried about climate change and the actions Montana is taking to promote fossil fuels, which make climate change worse. I have gotten involved with local organizing in Montana through the Sunrise Movement, as a means to try and protect my future from the worst impacts of climate change. But it's hard to achieve our goals when the state of Montana ignores us and continues to promote fossil fuels.
4. The actions the state of Montana is taking to promote fossil fuels exacerbates climate change and my concerns. As a means to take action and protect my future from the worst impacts of climate change, I have gotten involved with climate organizing in Missoula. From 2019 to 2021 I organized with Missoula's Sunrise Movement hub, where we elevated the urgency of climate change, grew local participation in climate activism, and challenged local politicians' involvement with fossil fuels. I currently organize with Seedlings for Solidarity, a mutual aid project expanding equitable access to seeds and seedlings. I will continue to organize with my community to help individuals with their personal sustainability and to combat Montana's unsustainable promotion of fossil fuels. But as long as the state of Montana continues to promote fossil fuels, I know it won't be enough.

5. My mental health is harmed by climate change and Montana's contributions to global climate change. In 2019 I was organizing a climate strike, when I had a sudden realization that I was not going to have the same future or opportunities that my parents had. Following that moment, my life, and my actions, were irrevocably changed. I am haunted daily by the knowledge of how climate change has changed and will continue to alter my world, my Montana. I feel consistent despair when I see the weather forecast, seeing the temperatures are abnormally hot or dry. I feel a desperate distress when I read the news, learning of the most recent impact of climate change in Montana. My distress is amplified by the knowledge that this will only worsen as climate change wreaks havoc upon Montana. Over the past couple years, beginning in 2019, I have monitored the temperatures and precipitation in Missoula. I observe these with an anxiety that there will be horrible fire seasons, droughts, and other extreme weather when there is not enough precipitation, which is more common than is used to be due to climate change. My mental health continues to suffer as a result of climate change; I experience continuous climate anxiety and I am in a constant state of deep sadness over the climate crisis.
6. As my knowledge of climate change has developed and evolved, I have been filled with dread and depression. I have made lifestyle changes in order to reduce my individual impacts on climate change. The changes I have made include: utilizing my bike as my main way of transportation, reducing my consumption of meat, decreasing my use of single use plastics, primarily making secondhand purchases, and implementing recycling and composting in my home. I am aware that in spite of my efforts climate change will continue to be exacerbated. I know that individual climate action holds deep importance. But this does not negate the responsibility of the state of Montana. I need my state to stop promoting fossil fuels, to take

actions to decrease greenhouse gas emissions, and to uphold its constitutional duty to provide its citizens, like me, with a clean and healthful environment.

7. As a Montanan, being outside and appreciating the beauty of nature is an essential aspect of my life. Year-round I go on daily hikes in the surrounding trails in Missoula. These trails include Blue Mountain, Waterworks, Pattee Canyon, the Rattlesnake, Mount Jumbo, and many more. In the late spring and summer, I love to swim in Flathead Lake, Salmon Lake, Seeley Lake, the Clark Fork River, and the Blackfoot River. I love spending time on all of the public land that Montana has to offer. Connecting with nature is very important to my health and well-being. Climate change is irrevocably harming this land and environment that I hold so dearly in my heart.
8. My first memory of really understanding what climate change means for the future was when I was in my 6th grade science class. My teacher informed us that the children of my generation would not be able to see the glaciers in Glacier National Park; my generation would be among the last. I had grown up learning that climate change existed and we needed to do our part to help the world; but until that moment I was not aware of the extent climate change would have on this world. After school that day, I went home to research climate change and I have continued a lifelong personal education of climate change. This led me to becoming very fearful and anxious of how climate change would truly manifest in our world. I have experienced a daily fear of climate change since 2015 and my anxiety has progressed as climate change has worsened.
9. Wildfires now make most summers smoky, especially in Missoula where any air pollution gets trapped in the valley. When the smoke gets trapped in the valley there is an orange haze everywhere. It feels like the town shuts down. In summer of 2017, when I returned from a trip

outside of Montana, smoke filled the sky in Missoula, turning it orange and making it impossible to see the airport or the mountains. I didn't want to come home to the place that I love because everywhere you could smell the smoke.

10. Every summer is plagued with wildfires that bring about weeks of smoke with poor to horrendous air quality. Each summer Missoula becomes empty, with people trapped in their homes or traveling to other places to escape the smoke. I know that people do this because my family is among those that leave Missoula because the smoke is so damaging to our health and safety. It breaks my heart to leave the town that I love so dearly because it is being rampaged by unbreathable air. In the summer of 2017, while returning from a trip from outside of Montana, I saw the valley completely overcome with an orange haze, the smoke, and I knew that I was about to be subjected to weeks of barely being able to breathe. Every summer since 2017, I have taken a trip out of Montana for the primary purpose of escaping the smoke. But I would rather stay in Montana, my home. The wildfires have continuously worsened over the years.

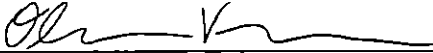
11. An aspect of why the smoke in Missoula affects my health to such a great extent is because of my exercise-induced asthma. I was diagnosed with this in seventh grade and I was prescribed an inhaler when I was thirteen. My asthma has worsened throughout the years, as I have spent so much time in poor air quality. The smoke truly inhibits my ability to breathe, I often cough and feel my lungs becoming tight, making me feel like my lungs are closing up. When the air quality is very horrendous I feel like I am going to suffocate when I am outside for longer than ten minutes. Every summer since 2016 the smoke has made me suffer from multiple asthma attacks.

12. I am unable to fully participate in summer activities, like hiking or swimming, due to the smoke. In summer 2022, the wildfire related smoke forced me to stay indoors due shelter-in-place orders and my physical health. I was unable to work because my job was closed due to smoke, so I missed days of work and was not paid.
13. In addition to exercise-induced asthma I also suffer from spring allergies. My symptoms have increasingly worsened over time and they last for around two months of the year. Every year since 2017 my eyes have swelled shut as a result of these allergies. My eyes swell shut at least four times over the course of these two months. My day-to-day life is very painful during these months. It makes it difficult for me to go outside during spring, making it unbearable to either decide to not enjoy nature or experience the full extent of my allergies.
14. Since I was a child I have always known that I would like to be a mother and have a family in that way. I fear that I will not have biological children because I do not want to bring children into this world and have them suffer from the effects of the climate crisis. This knowledge makes me truly sad that I will not get to experience the joys of raising children in a clean and healthful environment.
15. My government needs to make sure that its policies start reducing emissions in order for the people and places I love to have a chance at a safe future in Montana. I am doing what I can to reduce my own environmental impacts, but I know that the state of Montana has much more control over the problem than I do, and it needs to stop promoting fossil fuels and address the climate crisis.
16. The state of Montana has an obligation to its citizens to address the climate crisis and implement policies to reduce emissions and stop their promotion of fossil fuels. I will continue

to do my responsibility to reduce my own environmental impact, but Montana must provide its citizens with a safe future.

Pursuant to MCA §1-6-105, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of February, 2023 in Missoula, Montana.

  
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Olivia Vesovich