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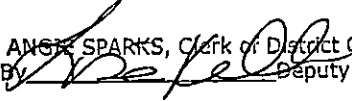
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ANGIE SPARKS, Clerk of District Court
By  Deputy Clerk

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 DECLARATION OF LANDER BUSSE IN SUPPORT OF PLAINTIFFS' RESPONSE BRIEF IN OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT
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Pursuant to MCA §1-6-105, Lander Busse 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 an eighteen-year-old citizen of the United States and a resident of Kalispell, Montana. I am a plaintiff in this case because every fall, I make plans for the following year to hike, fish, and explore the wilderness around me. All of these activities are a crucial part of my life, but I worry I will have to give up on my cultural values because of the impacts of the climate crisis.
3. I can already see clearly the impact of climate change in Montana and in my life. It affects my daily life and I know it is just going to get worse as long as the state of Montana continues to rely on fossil fuels as an energy source and ignore the widespread environmental implications of climate change. The state's promotion and widespread use of fossil fuels is counter-productive and unsafe. I want kids that come after me to be able to enjoy the same wilderness that I am growing up in.
4. My first memory of beginning to understand the impacts of climate change is when I was eleven or twelve years old and was on my first deer hunt with my dad. We got up very early and hiked up to the top of a hill. As the sun came up and began to shine over everything in the valley I thought about what I had heard about fossil fuels and mining and sat there not understanding how everything in front could be at risk or why anyone would want to harm it. But I knew it was my citizen's duty to protect Montana's beautiful environment and open spaces from fossil fuels and climate impacts.

5. One of my favorite outdoor activities is fishing for bass, cutthroat trout, rainbow trout, and other fish. I like that we get our own food and can eat fish and wildlife that we fish and hunt for, not only because it tastes good, but because it makes us self-sufficient. However, it continues to be increasingly difficult to fish. The fish are dying off because the temperature of the water gets too hot. Increasingly, the rivers I often fish on, including the Flathead River and the Blackfoot River, have been shut down because of low water levels in the summer. We have also been getting less precipitation, but then there will be large amounts of rain in spurts. For example, it will happen at the beginning of the summer and then nothing for months. This adds on to the flooding of rivers as well. It's my understanding that climate change is responsible for these changes in Montana's rivers.
6. Hunting is another important means by which me and my family get food as we hunt for big game like antelope, deer, and elk every fall. My dad and I try to fill our freezer with deer and antelope. It is a really community-based activity, and we share the meals with others. However, the air quality has increasingly become more smoky from forest fires and sometimes I cannot go hunting or camping as a result. Climate impacts, like drought, also impact the wildlife we hunt for, which makes hunting harder for us. The increased forest fires also inhibit my ability to hunt because we cannot hunt where the forest has burned. Increasing temperatures can also make hunting unbearable because of all the layers I wear and the gear I need to carry to be safe. Here is a picture of me hunting in Montana.
7. I also hunt birds and eat what I hunt. I have seen first-hand a decrease in the population of birds in some of our most popular hunting spots and I believe this is related to climate change. Here is a picture of me hunting birds in Montana.



8. Outdoor hockey is another activity that I enjoy that is affected by the increasingly warm temperatures. Given that we play outside, when it is too warm, we cannot practice because the ice doesn't form. In January 2020, there was a day where it was already 53 degrees F, which is very unusual for the winter in Montana. I know that with climate change it will only get harder to play hockey outside in the winter.
9. During the summer months, I frequently can't go outside at all because of the air quality or smoke from wildfires. In Montana, there were huge wildfires in Badger-Two Medicine in 2015, which is a spot we have traveled to a lot as a family. The wildfires burned massive pine trees to a crisp, which have been there for centuries. Those white pines were some of the oldest living trees and it's terrible to see them die and know that the landscape will take centuries to heal. This is a picture of me in the burned forest in Badger-Two Medicine.



10. When there was a wildfire on the neighboring mountain to our home in 2018, we had to pack emergency bags in case we had to leave. That was a jarring experience for me. I feel lucky that the fire did not reach our home that time, but I know in the future there could be another fire that might threaten my family home. I have already noticed an increase in forest fires in my lifetime and I know things will get worse if the state of Montana continues to promote fossil fuels.
11. I have experienced more extreme allergic reactions as a result of increased pollen counts in the last few years. When I have allergic reactions I am stuffy and my eyes swell up, which can be hard to deal with if I do not have the right medicine. I understand that climate change is causing an increase in the length and severity of the allergy season.
12. Our home is less than an hour away from Glacier National Park and I have visited the park often. Unfortunately, I have also observed the glaciers get smaller over the course of my life. It's hard to know how much longer we'll even call it Glacier National Park if there is nothing but sparse icy remnants left of the once towering glaciers. It's devastating to think about how


a place I've been going to my whole life, may be ruined within my lifetime, and may not be able to be enjoyed by future generations.

13. I care deeply about protecting Montana's environment, which is an big part of my family's traditions, culture, and identity. It is traumatic to witness the climate crisis in Montana and my overall view of the future feels pretty bleak.

14. I am disappointed that my state government continues to rely on fossil fuels so much for energy despite the availability of renewable energy options. As a young person, the burden of climate change and my government's actions to promote fossil fuels falls to my generation to fix, which isn't fair. I do not want to be the generation that has to become an adult in a world devastated by climate destruction, but I see no other option if Montana continues to rely so heavily on fossil fuels. I know there is not an immediate fix to all these issues, but I do believe that there can, and must, be a catalyst for change, and I believe this lawsuit is a necessary step to hold my state accountable for harming me and violating my constitutional rights. If the judge rules in our favor, it will help put the state on the right track and make me feel like there is still hope we can address the climate crisis in time.

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

Executed this 8th day of February, 2023 in Kalispell, Montana.



Lander Busse