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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 KATHRYN GRACE GIBSON-SNYDER 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, Kathryn Grace Gibson-Snyder (“Grace”) 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 U.S. and a resident of Missoula, Montana. I currently attend Yale University in New Haven, Connecticut, but consider Missoula my home and return regularly.
3. My first concrete memory of learning about climate change was watching a documentary in middle school. However, I really felt called to take action to address climate change when I had the opportunity to go to the 23-day Global Leadership Forum in New Mexico in 2018. It was right after my freshman year of high school, and I was excited to go. I have had a lifelong interest in human rights and women’s issues. I want to spend my life doing things that help people. After learning more and talking with my parents about it, I realized that working to address climate change *is* about helping people, and making that connection was a major turning point for me.
4. When I was in high school, I was involved in an environmental group at my high school called Students Against Violating the Environment (“SAVE”). I served as president my senior year. We ran the recycling/composting programs, had a garden, and built a greenhouse. My main project was a campaign to stop the use of single-use plastic in my school’s cafeteria. Separately, I worked on a project called BYO (“Bring Your Own”) that aimed to decrease plastic waste at restaurants in Missoula. I also worked alongside parents and teachers to implement climate change curricula in the local school district. I feel an overpowering

obligation to do everything I can to prevent climate change. But at the same time, I know I cannot do this on my own, and that my state government needs to stop promoting fossil fuels if we are to truly address the climate crisis.

5. I am a sixth generation Montanan and have grown up with a deep love for Montana's beauty and natural spaces. Spending time with friends and family in the outdoors has always been a big part of my life. For example, growing up, every year for my birthday my family and I would go to Yellowstone National Park to hike, bike, and cross-country ski.
6. Summer in Montana brings wildfires, and wildfires bring smoke. When I was in high school, I played for my school's soccer team. During most of the years I was on the team, our practices and games had to be rescheduled, canceled, or cut short because the smoke made playing outdoors dangerous to our health. In 2017, the smoke was so bad that it was hard to go outside for a month. I know that exercising outside when it is smoky is bad for my health and has potentially life-long consequences.
7. In 2021, the smoke from the fires was especially bad. There was smoke everywhere. Ironically, a climate event I was helping to plan had to be canceled because of poor air quality, as illustrated by the following image.



8. The wildfires harm my enjoyment of the places in Montana I love and my ability to safely recreate outdoors, which was a vital part of my life in Montana. In 2021, I visited Glacier National Park four times with my family or friends, but the smoke obscured the normally beautiful views of the park. The smoky air greatly reduces my enjoyment of hiking in Glacier National Park and other areas in Montana and makes what should be a healthy activity into an unhealthy one for me. This is a picture taken in July, 2021, showing the smoky valley in Glacier National Park.



9. The wildfires and smoke have affected my life indoors, too. When the fires are bad, the smell of smoke is constant. It seeps into everything, even in my house. It is almost like you can touch the smoke in the air. It irritates my throat, which gets really itchy. I start coughing. It is a constant reminder of the climate crisis and how harmful it is for my health, safety, and well-being. When the smoke is bad, the news warns people not to go outside unless we have to, to avoid unnecessary activity, and to wear masks. Unfortunately, I know that climate change will continue to make the wildfire season longer and more severe unless greenhouse gas emissions from fossil fuels are reduced immediately.
10. I've started to see local organizations in Missoula implement adaptation measures. For instance, they provide air filters for houses to protect from wildfire smoke. But I know this

isn't enough and will not address the underlying problem of climate change. Meanwhile, the state of Montana continues to promote fossil fuels, despite the obvious dangers of climate change, so the problem is only getting worse. I am hopeful this court will rule in our favor so the state can make sure their energy policy doesn't harm young people like me.

11. I'm afraid of what the future will bring and how it will affect my ability to enjoy the beauty of Montana in other ways, too. When I visited Glacier in 2021, I felt a deep sense of loss watching water stream from the melting glaciers, realizing that we may lose the glaciers in my lifetime. I worry too about the wildlife that will disappear. Pikas are little ground squirrels that are cold weather rodents, and it's getting too warm for them here. Trees are threatened by bark beetles; it's not cold enough to kill them so they multiply and kill the trees. The beetles are spreading quickly in Montana, killing trees and increasing the risk of severe wildfires. I care deeply about the natural environment and am distressed to see so much destruction to it because of climate change.

12. I think about my future a lot. I would like my future family to enjoy the beauty of Montana I have always known and is such an important part of who I am today. But I don't know if I want to have children because I am worried about the Montana that they would be living in if climate change isn't quickly addressed. I have real concerns about bringing kids into the world given the already severe climate impacts, which I know will get worse so long as Montana continues to prioritize fossil fuel development. I'm also deeply worried about the mental health harms any kids I have would endure as I expect they would face the same grief and anxiety as me, unless the climate crisis is addressed. Young people like me understand what is at stake, and understand that we have a limited time to transition off of fossil fuels to ensure we have a safe and secure future for ourselves and our children. I am living with the consequences that

result from my state government's ongoing promotion of fossil fuels. Older generations are not suffering in the same way that youth like me are.

13. Climate change has a large impact on my mental health. I feel stress and anxiety imagining all the future summers filled with wildfire smoke. I feel loss and worry about the glaciers melting and species loss. When I see coal trains transporting coal through Missoula, they remind me of how my state continues to permit coal extraction and burning, even though they know it is harmful to youth and the natural environment. I'm constantly stressed about the loss of the natural spaces near my home in Montana, and I feel an overpowering obligation to do everything I can to prevent climate change, which causes me anxiety and also depression. Knowing what I do about climate change and seeing how Montana's government continues to promote fossil fuels is especially devastating. I feel like my state government is betraying me and my future. I am doing everything I can to protect myself and others from climate change, but I need the help of the court to make sure that my government changes course and stops promoting fossil fuels.

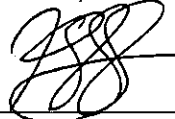
14. While I am very scared about the future, I am also optimistic that if we win this lawsuit, a different future will be possible, one where climate impacts are lessened and I can enjoy Montana's clean and healthful environment. I know that alternatives to fossil fuels are available, and I hope that this lawsuit will help bring about a transition off of fossil fuels in Montana.

15. I am so excited about the trial date in this case. I look forward to the opportunity to tell the judge how I am impacted by climate change. It's frustrating, and it shouldn't be my responsibility to challenge government action in this way, but even so it feels good to know that my voice and injuries will finally be heard by those in power. The Defendants' repeated

efforts to have my case dismissed, and to postpone, or avoid trial all together, is also very frustrating because climate change is a very time-sensitive issue. In the midst of the current climate crisis, we have no more time to delay. I feel betrayed by Defendants' efforts to fight my case, to deny basic science, and to prioritize fossil fuel interests over what's best for Montana's youth, like me. A successful outcome in this case would help restore my confidence in Montana's government and give me hope for the future.

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

Executed this 9th day of February, 2023 in New Haven, Connecticut.



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Kathryn Grace Gibson Snyder