

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 19-cv-01449-REB

WILDERNESS WATCH, SAN JUAN CITIZENS ALLIANCE, and  
GREAT OLD BROADS FOR WILDERNESS,

Plaintiffs,

v.

BRIAN FEREBEE, in his official capacity as Regional Forester, and  
UNITED STATES FOREST SERVICE, a Federal Agency within the U.S. Department of  
Agriculture,

Defendants.

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**DECLARATION OF MICHELE S. SILBERT**

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I, Michele S. Silbert, a resident of La Plata County, Colorado, do hereby declare by knowledge and belief:

1. I currently reside at [REDACTED].
2. I became a Great Old Broads for Wilderness (Great Old Broads) member in 2012.
3. I have worked in natural resource conservation since 1989, working with Northern Arizona University, University of Arizona, The Nature Conservancy, San Juan Citizens Alliance, and Great Old Broads for Wilderness.
4. I have been employed by Great Old Broads from 2012 to the present. My current role is Executive Director.
5. I am familiar with the Great Old Broads' organizational mission. Great Old Broads is a national grassroots organization, led by women, that engages and inspires activism to preserve and protect wilderness and wild public lands. With its 8,500 members and advocates, Great Old Broads works to train women as effective leaders and to amplify their voices to protect public lands and wilderness.
6. Great Old Broads' staff, including myself, participate in public land management on behalf of the organization and on behalf of Great Old Broads' members. We train members as grassroots leaders of local chapters (called "Broadbands") such as the South

San Juan Broadband. Staff, chapters, and members participate in land stewardship and monitoring projects in collaboration with agencies, including on the San Juan and Rio Grande National Forests. Staff and members also participate in public comments, appeals, and objections to ensure that that public land management is carried out using the procedures, policies and laws established to protect land, water, air, wildlife, as well as the protection of recreation, opportunities for solitude, natural quiet, spiritual rejuvenation, and other human benefits of public lands.

7. Great Old Broads is participating in this litigation on its own behalf, and on behalf of numerous Great Old Broads members who are affected by the outcome of this litigation.
8. I have spent significant time since 2011 in the Weminuche Wilderness, hiking on numerous trails, backpacking into various locations, and enjoying the rich diversity of landscapes, habitats, and watercourses available.
9. I value wilderness areas as treasured places for me to explore the many facets of natural processes, seek solitude and natural quiet, find spiritual rejuvenation and relaxation, expand my botany, birdwatching, and wildlife watching skills, explore the night sky, learn natural and cultural history, and find a temporary retreat from the business of civilization.
10. Since moving to Durango in 2011, I have regularly visited the Weminuche Wilderness to hike, backpack, ski and enjoy its solitude, beauty, and natural quiet. I've hiked in the Weminuche Wilderness this summer, including on the Purgatory Flats Trail, backpacked and hiked in areas including the Elk Park, Pine River, Emerald Lake, Vallecito Creek, West Fork, Crater Lake, and Cascade Trails in 2018, and previously on these trails as well as Turkey Creek, Fourmile Lake, Transfer Park, and others. I hiked in the South San Juan Wilderness in 2017 on the Ruybalid, South Conejos River, and Tobacco Lake Trails, and helped the Rio Grande National Forest with trail maintenance work on the Bear Lake Trail.
11. I plan to return to the Weminuche Wilderness on an ongoing basis in the future, including several hiking and backpacking trips this summer. I plan to take several weeks to backpack the Continental Divide Trail in the South San Juan Wilderness from Cumbres Pass to Wolf Creek Pass, and continue in the Weminuche Wilderness from Wolf Creek Pass to Molas Pass in 2020.
12. If chainsaw use is allowed in the Weminuche and South San Juan Wildernesses, my use and enjoyment of this area will be harmed, including by the cacophony of chainsaw motors, the impact on my experience of solitude, the visual impacts of trees cut by chainsaws, and the concerns about disturbance to wildlife such as nesting songbirds and raptors, small and large mammals, and the endangered Canada lynx. Mostly, I will be deeply disturbed by the knowledge that the Wilderness Act is not heeded in these wilderness areas, and I will feel anxious that this blatant lack of adherence to the spirit and the law in relation to the Wilderness Act could be replicated in other wilderness areas across the country.

13. A Court order restraining these motorized intrusions would protect my interests in enjoying and protecting the Weminuche and South San Juan Wildernesses currently and in the future.
14. Great Old Broads is a corporation that is exempt from Internal Revenue Service taxation. 26 U.S.C. § 501(c)(3). Great Old Broads has far fewer than 500 employees and a net worth of far less than \$7,000,000 now and at the time the civil action was filed, and therefore meets the employee and asset limits set out in the Equal Access to Justice Act 28. U.S.C. § 2412(d)(2)(B). Without the prospect of public interest environmental attorneys recovering attorney fees, Great Old Broads would not be able to pursue litigation that serves the organization's purposes. Similarly, if required to post an injunction bond, Great Old Broads would not be able to seek a preliminary injunction or take other steps to ensure effective relief remains available for the meritorious claims presented in our Complaint.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on this 3rd day of June, 2019 in La Plata County, Colorado.

/s/ Michele S. Silbert  
Michele S. Silbert