

1 Ronald A. Shems (*pro hac vice*)
2 SHEMS DUNKIEL KASSEL & SAUNDERS PLLC
3 91 College Street
4 Burlington, VT 05401
5 802 860 1003 (voice)
6 802 860 1208 (facsimile)

7
8 Richard Roos-Collins (Cal. Bar no. 127231)
9 NATURAL HERITAGE INSTITUTE
10 2140 Shattuck Avenue, 5th floor
11 Berkeley, CA 94704
12 (510) 644-2900
13 (510) 644-4428 (fax)

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15 Attorneys for Plaintiffs
16 Friends of the Earth, Inc., Greenpeace, Inc.
17 City of Boulder, CO, City of Oakland, CA
18 City of Arcata, CA, Santa Monica, CA

19
20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION
23

24	FRIENDS OF THE EARTH, INC., et al.,)	
25)	
26	Plaintiffs,)	Civ. No. C 02-4106 JSW
27	v.)	
28)	Date: February 11, 2005
29	PETER WATSON, et al.,)	Time: 9 A.M.
30)	Courtroom 2, 17 th Floor
31	Defendants.)	

32
33
34 DECLARATION OF MELANIE DUCHIN

35 I, MELANIE DUCHIN, declare as follows:

- 36 1. My name is Melanie Duchin. I live and work in Anchorage,
37 Alaska. I am a member of Greenpeace. I am also employed by Greenpeace.
- 38 2. I have personal knowledge of the matters set forth herein,
39 except for those items stated to be based upon information and belief, and as

1 to those matters I am informed and believe them to be true as expressly
2 stated herein, and if called to testify I could and would competently testify
3 thereto.

4 3. I purchased a home in July 2003 in downtown Anchorage. I just
5 sold it and purchased another home about ½ mile away, also in downtown
6 Anchorage. In both of my recent decisions to purchase a home, I really
7 wanted to live on the Anchorage Hillside since it's closer to the mountains
8 and trails that I use for recreation.

9 4. I have been informed and believe that global warming is
10 contributing to a spruce bark beetle outbreak that has decimated the forests
11 of southcentral Alaska. Many forests and spruce trees are dead or dying,
12 creating a significant fire danger. Warmer temperatures and drier weather
13 over the last several years also contribute to this fire danger. Alaska had a
14 record-breaking fire season in the summer of 2004. It was hot and dry all
15 over the state, Anchorage included, and fires in the interior filled the
16 Anchorage area with dense smoke in July. Fire danger was heightened on
17 the Anchorage Hillside this past summer. I decided not to purchase a home
18 on the Hillside because of the risk of fire danger associated with the spruce
19 bark beetle infestation.

20 5. The dying spruce trees also harm my recreational interests in
21 Southcentral Alaska. I live fifteen minutes from hiking trails in the Chugach
22 mountains which form a perimeter around the south and east sides of
23 Anchorage. I regularly hike and run in the Chugach Mountains. I also travel

1 to the Matanuska-Susitna Valley, Prince William Sound and the Kenai
2 Peninsula several times every summer to visit friends, hike and run in the
3 mountains, and kayak in the Sound. The fire danger in these areas
4 diminishes my enjoyment of these areas. Dead and dying spruce are
5 everywhere. My wilderness and recreational activities are diminished by
6 concern and worry about the threat of fire. The dead and dying forests also
7 have dramatic and adverse impact on Alaska's aesthetic beauty, and
8 diminish my enjoyment of these areas.

9 6. I spend time in the Alaskan Arctic for personal recreation. The
10 Arctic is my favorite place in the world because of its unique beauty and the
11 distinctive Arctic species of flora and fauna that live there. I participated in
12 a whitewater rafting trip down the Hula Hula River in June of 2000. The trip
13 started in the Brooks Range and ended at the Beaufort Sea. The entire trip
14 was in the Arctic and in environments of permafrost, glacially-fed rivers and
15 the Beaufort Sea. I believe each of these environments is being affected by
16 global warming. I intend to continue to travel in the Arctic for recreational
17 purposes, and as such, my recreational and aesthetic enjoyment will be
18 adversely affected by global warming. I love to bird watch, see mammals
19 such as musk ox, caribou, grizzly bears, wolves, seals, Pacific walrus, polar
20 bears and whales.

21 7. I have been informed and believe that global warming threatens
22 the populations of many of these species, including the polar bear. The latest
23 Arctic Council study on global warming predicts the extinction in the wild of

1 polar bears by the end of this century. Other models say the Arctic may be ice
2 free in summer by 2050, which also spells extinction for polar bears and other
3 wildlife in the Arctic.

4 8. It is very important to me that the Arctic environment not melt
5 down, and that all of its distinctive Arctic species and ecosystems remain
6 intact. I intend to return to the Arctic in coming years to pursue my
7 interests. I planned another trip down the Hula Hula in the summer of 2004
8 but had to cancel that trip due to my work schedule. I am planning another
9 Arctic river trip for the summer of 2005 and intend to return to the Arctic for
10 river or backpacking trips in subsequent years. I hope to spend time on the
11 ice with my dog in the spring of 2005 and subsequent years.

12 9. My Labrador retriever has been trained to track ringed seals for
13 biologists studying this Arctic species on the ice. My dog has worked with
14 biologists on the ice every spring from 2001-2004 and will do so again in the
15 spring of 2005. It is my intention to have him work every spring. I am
16 continuing my dog's training and I intend to travel to the Arctic to work with
17 him and a team of biologists conducting research on ringed seals. The
18 shrinking and receding pack ice makes the Arctic environment more
19 dangerous for me and my dog. Early spring break-up, early flooding of rivers
20 and unstable ice are hazards that are linked with and exacerbated by global
21 warming.

1 10. I believe that OPIC's and ExIm's actions increase the risk
2 that my interests are and will continue to be harmed by climate change.

3
4 I swear under the penalty of perjury that the foregoing is true and
5 correct to the best of my knowledge.

6
7 December 17, 2004

8 A handwritten signature in cursive script, reading "Melanie Duchin", is written over a horizontal line.

9 Melanie Duchin