

# Exhibit 9

In Support of Plaintiffs' Partial Motion for Summary Judgment  
on Their Endangered Species Act Listing Claims

in

*Center for Biological Diversity et al., v. Jim Kurth et al.*, No. 1:15-cv-00477-EGS

and

*Defenders of Wildlife v. Jim Kurth et al.*, No. 1:16-cv-00910-EGS

Consolidated Cases

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

CENTER FOR BIOLOGICAL )  
DIVERSITY, *et al.*, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
DANIEL M. ASHE, *et al.*, )  
 )  
Federal Defendants, )  
 )  
AMERICAN FOREST & PAPER )  
ASSOCIATION, *et al.*, )  
 )  
Defendant-Intervenors. )  
\_\_\_\_\_ )

Case No. 1:15-cv-00477-EGS

DEFENDERS OF WILDLIFE, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
DANIEL M. ASHE, *et al.*, )  
 )  
Federal Defendants. )  
 )  
AMERICAN FOREST & PAPER )  
ASSOCIATION, *et al.*, )  
 )  
Defendant-Intervenors. )  
\_\_\_\_\_ )

Case No. 1:16-cv-00910-EGS  
(Consolidated Case)  
Honorable E.G. Sullivan

DECLARATION OF JONI JOHNSON-GODSY

I, Joni Johnson-Godsy, hereby declare as follows:

1. The facts set forth in this declaration are based on my personal knowledge. If called as a witness, I could and would testify competently to these facts. As to those matters which reflect an opinion, they reflect my personal opinion and judgment on the matter.

2. I am a "50-something" woman who resides in Shawnee, Kansas, specifically Johnson County. I am a member of the Sierra Club and also a member of a Sierra Club Meet-Up group which sponsors regional hiking, camping and exploration opportunities. I believe that the Sierra Club plays an important role in working to keep balance in the natural world through education and legislation. In the past I have also traveled abroad to the Amazon rain forest and to Central America, with the World Wildlife Fund which also works to keep a healthy natural balance in the world. My husband and I have traveled to Africa and the Yukon also, which illustrates how interested and passionate we are in the natural world.

3. My husband and I own a home on 5 wooded acres in Johnson County, Kansas and chose this residence because of its natural beauty. Ours is a "chemical free" zone for wildlife because we believe that a healthy living environment for humans is one which includes ALL wildlife species, even the ones that in the eyes of the public are not necessarily popular. In our woods all creatures are not only welcome, but are encouraged to live in their most natural state. When the wild world is balanced, we all benefit. We've noticed that we have very few flying insect "pests" here because we allow the woods to reduce and regenerate on its' own fruition. This allows things like birds, bats and snakes to thrive here. These creatures are master insect eaters...nature's solution to keeping insects from breeding out of control. It works. Our home is proof of it.

4. I knew from a very early age in my life that I would become a professional artist. And I knew what my subjects would be.....animals. I worked as a greeting card illustrator for 22 years illustrating animals for Hallmark, but couldn't resist the pull from my true love which is wildlife. In time I made the transition from the corporate environment to the wild one, depicting the wilds in my paintings and bronze sculptures. I can't imagine this world without these

amazing creatures in it. It is so very important to people like me. It is disturbing that a few people in our society can make decisions about downgrading protections for threatened species because they are inconvenient. This world belongs to ALL of us, not just a chosen few. When we allow one species, even a seemingly innocuous one to die off, nature is thrown off balance. If we eliminate or greatly reduce a bat population, insects can breed unchecked. This kind of wildlife management makes no sense and has catastrophic repercussions not only for us but also for those human beings that follow in our footsteps. This is a dangerous practice. And there is no GOOD reason for it.

5. Back in the 1990's I became an avid caver. I explored wild caves with some buddies of mine from work. We visited amazing underground chasms all throughout Missouri. Through this I got to step into a very special world. I learned firsthand how the underground world works and how animals navigate that special world. I learned how much I really love and appreciate bats...all species, and the valuable services that they provide for us...for FREE. What amazing creatures they are. I feel strongly that they have as much of a right to be here as anything else does. Inconvenience does not make them any less valuable or necessary. For those of us who enjoy watching them as they swoop and dive in the air ridding our night skies of insects, we understand their vital role in the eco system. To allow them to fade into the distant memory of our subconscious would be a very unnecessary tragedy. And it's not fair to those of us who really do care.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16 day of March,

Joni Johnson-Godsy

Joni Johnson-Godsy

Shawnee, Kansas