

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

NATURAL RESOURCES DEFENSE COUNCIL,
INC.; CENTER FOR BIOLOGICAL DIVERSITY;
FRIENDS OF MINNESOTA SCIENTIFIC AND
NATURAL AREAS,

Plaintiffs,

v.

UNITED STATES FISH AND WILDLIFE
SERVICE, MARTHA WILLIAMS, in her official
capacity as Principal Deputy Director of the
U.S. Fish and Wildlife Service; UNITED STATES
DEPARTMENT OF THE INTERIOR,

Federal Defendants.

Civ. No. 1:21-cv-00770-ABJ

DECLARATION OF JASON TAYLOR

I, Jason Taylor, declare as follows:

1. I am a member of the Natural Resources Defense Council (NRDC) and have been since January 2021.
2. I joined NRDC because the work it does aligns with my deep passion for protecting species and habitats and ensuring stable and resilient ecosystems. I work on habitat and species restoration in Iowa, and I appreciate that NRDC is able to tackle these problems on a policy level. I currently live in Iowa City, Iowa, and have been here since 1997.
3. I have a background in environmental science and have been doing field-level natural resource management since 2004. Since 2019, I have been the Executive Director of the Bur Oak Land Trust. The Land Trust owns and maintains 12 properties and 500 acres, predominantly in Johnson County, Iowa. Once we acquire land, we work to restore it to its native

state as a prairie or woodland ecosystem. Protecting and restoring land is critically important in Iowa, as it is considered to be the most ecologically altered state in the country. In the last 170 years, Iowa has lost 99% of its prairies, with millions of acres of pollinator habitat completely lost to corn and soybean fields.

4. One of my professional and personal interests is the protection of endangered and threatened species and habitats. As humans, we tend to focus on the keystone species that are especially visible; this can cause us to lose sight of the importance of other species, how they fit into the ecosystem, and how it will impact the ecosystem when any individual species is removed. Some species have been evolving for millions of years, but humans are now bringing the existence of many of them to an abrupt end. We have a responsibility to try to identify and protect vulnerable species, especially if we believe in the importance of stable and resilient ecosystems.

5. In 2018, I developed an interest in the rusty patched bumble bee, soon after I learned it was listed as a federal endangered species and identified one in the prairie I had planted in my backyard. On a Sunday morning in late July, 2018, I was walking through my yard prairie when I saw a bee that looked like a rusty patched bumble bee. I took a photo and verified its identity on the bumblebeewatch.org website, confirming that the first endangered species I ever found in the wild was in my own urban backyard prairie.

6. Below is the picture of a rusty patched bumble bee I took in my yard on July 29, 2018:



7. Since my first sighting of the species, I have been developing a variety of projects to protect the rusty patched bumble bee. Around my own home, I have been working to increase bee-friendly habitat by removing invasive vegetation and installing plants that I've identified as popular with bees. This year, I've started to see rusty patched bumble bees more frequently in my yard, particularly when native bergamot and joe pye weed are in bloom. There was a week this July when I would go into my yard and find the bee every day. I plan on continuing to develop bee habitat on my property and to regularly look for the bee in my yard.

8. Beyond my own home, I've helped develop a program to train volunteers to identify rusty patched bumble bees in Johnson County. After the initial training that I led in 2018, volunteers and I identified the bee at five of the Bur Oak Land Trust's properties. When we find the bee, we submit the sightings to the bumblebeewatch.org website so they can be verified. I had originally planned to coordinate a large-scale survey of rusty patched bumble bees in 2020 and 2021, but because of the COVID-19 pandemic, I have been unable to hold in-person volunteer trainings. I plan to resume these trainings once it is possible to do so again.

9. Since the onset of the COVID-19 pandemic, I've also worked with others to publish resources online to help people identify the bee. Given its endangered status, people get really excited about the bee after they learn about it. This past June, during Pollinator Week, I spoke about rusty patched bumble bees to an audience of around 100 people at an event at a local microbrewery. People who attended this event have told me afterwards that they started looking for—and found—the bee, and submitted the results to [bumblebeewatch.org](https://www.bumblebeewatch.org). My hope is to engage the community so that Iowans understand that these bee populations exist and have the resources to look for and protect the species. I plan to continue developing these trainings and events for the community, both during the pandemic and after.

10. I visit properties adjacent to the Coralville Reservoir, a federally owned recreational area in Johnson County, about twice a month. Whenever I'm there, I search for rusty patched bumble bees. Although I haven't been successful yet, a colleague of mine did record an observation of the species at the Macbride Nature Recreation Area, which is a part of the Coralville Reservoir complex and owned by the U.S. Army Corps of Engineers, in August of 2018. I plan to continue to try to find the species in that area in the future, including in 2022 and beyond. Through my work, I seek to preserve land surrounding the Coralville Reservoir because the Reservoir creates a natural corridor that is home to a myriad of native species, from bobcats and orchids to rusty patched bumble bees. I value the Coralville Reservoir and these surrounding nature areas as an important ecological and recreational fixture of the community.

11. I enjoy observing rusty patched bumble bees because it feels like the work that I and others have been doing to preserve and restore their habitat is making a difference. Rusty patched bumble bees are native to Iowa prairies, but the little prairie habitat that remains could have easily become lawns or corn fields. People had to make decisions and put time and effort

into preserving and restoring native vegetation, which gives the bee an opportunity to still exist. When we see the rusty patched bumble bee, we're potentially seeing the last of their kind. Yet, people often take it for granted when they see these amazing creatures and don't understand how vulnerable they are. It makes me emotional when I see the species. They're very resilient, but that resiliency only goes so far when we've stacked so much against them, from herbicide use to habitat loss; humans are the reason they're going downhill. So when I do observe the species, I know that we've been doing something right and are having a positive impact.

12. As I search for, protect, and build community engagement around the rusty patched bumble bee, I derive aesthetic, personal, professional, economic, and recreational benefits from the bee and its habitat.

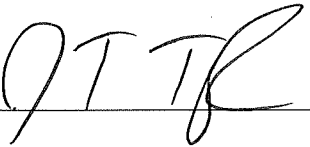
13. I am concerned that continued failure to designate critical habitat for the rusty patched bumble bee will decrease the bee's chances of survival and recovery. The Land Trust tries to acquire land that we believe will have threatened and endangered species like the rusty patched bumble bee. For instance, we are currently working to acquire a 200-acre property in Iowa that contains approximately 60 acres of degraded sand prairie, a unique pollinator habitat in Iowa. However, we have limited resources and can protect only a small fraction of the habitat needed to support the bee's continued existence. Much more is needed to safeguard and restore the bee's habitat, and I believe that critical-habitat designation is essential on that front. If the rusty patched bumble bee were to go extinct, I would take its absence personally. I would feel that it is an absolute failure of mankind to have not done enough to protect this species.

14. I support this lawsuit. If NRDC were to prevail, and the U.S. Fish and Wildlife Service were to designate critical habitat for the rusty patched bumble bee, I would feel that we are moving in the right direction in restoring this rare and vulnerable species. For me, both

personally and professionally, safeguarding the bee's habitat would make it more likely that I can continue to see the bee in the future, and that I can continue to engage my community with this amazing creature.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this 18 day of November, 2021, in Iowa City, IA.



A handwritten signature in black ink, appearing to read 'JT TR', is written over a horizontal line.

Jason Taylor