

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION

COTTONWOOD ENVIRONMENTAL LAW)
CENTER, *et al.*)

Plaintiffs,)

vs.)

YELLOWSTONE MOUNTAIN CLUB, LLC)

Defendant.)

Case No. 2:21-CV-00093-BMM-JTJ

DECLARATION OF
MERIWETHER SCHROEER-SMITH

I, Meriwether Schroeer-Smith, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I have personal knowledge of the matters stated herein and, if called as a witness, would competently testify.
2. I submit this declaration on my own behalf and as a member of Cottonwood.
3. As a member of Cottonwood, I donate time to the organization.
4. I am a member of Cottonwood because I believe in the power of legal advocacy and the need to firmly stand for the preservation of the world's dwindling natural spaces and systems.
5. I was raised in Montana, and have lived here all of my adult life.
6. I am currently a senior at Montana State University where I study Environmental Policy.
7. The Yellowstone Club should not be allowed to unlawfully discharge pollution into a tributary of the Gallatin River.
8. The discharge harms my conservation interest in maintaining and restoring the water quality of the Gallatin River.
9. I raft the Gallatin River, but I will now avoid the river because of the Yellowstone Club's unlawful discharge.
10. The Yellowstone Club needs to take responsibility and stop illegally discharging pollution into the Gallatin's tributary.
11. It is unjust that the Yellowstone Club can ruin recreational opportunities for an entire region of the state, hurt the sustainable recreation economy, and cause permanent harm to the regional ecology without any repercussions.
12. The Yellowstone Club seems to think it can get away with polluting the Gallatin and its tributaries because it has money. We cannot count on politicians to protect our rivers. The law is the only thing that can be used to hold the Yellowstone Club accountable.

13. An injunction that stops the Yellowstone Club from building until the Clean Water Act violations are addressed is appropriate.

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

A handwritten signature in black ink, appearing to read "Matthew S. S.", written in a cursive style.

Date: December 9, 2021.