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Attorneys for Plaintiffs

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

WOLF RECOVERY FOUNDATION, and)
WESTERN WATERSHEDS PROJECT)
)
Original Plaintiffs,)
)
and)
)
THE WILDERNESS SOCIETY, GREAT OLD)
BROADS FOR WILDERNESS, IDAHO)
CONSERVATION LEAGUE, WINTER)
WILDLANDS ALLIANCE, WILDERNESS)
WATCH, and SIERRA CLUB,)
)
Co-Plaintiffs On Third Claim For Relief)
)
v.)
)
U.S FOREST SERVICE and USDA APHIS)
WILDLIFE SERVICES,)
)
Defendants.)

No. 09-cv-686-BLW

**DECLARATION OF
LON STEWART**

I, Lon Stewart, declare:

1. My name is Lon Stewart, and I reside in Boise, Idaho.
2. For nearly 20 years I have worked in environmental compliance in the hazardous waste industry. My college degree is in petroleum engineering.
3. I am a member of the Sierra Club, and am an active volunteer with the Sierra Club's Idaho chapter (which covers the entire state). I am chairman of the Executive Committee of the Sierra Club's Middle Snake Group, which covers the southwest portion of Idaho. I am also a member of The Wilderness Society.
4. I support these groups, in part, because they work to protect wilderness areas and wildlife values that I cherish in Idaho. The wildlife and public lands cannot speak for themselves, and I think it is important to have groups and individuals, like myself, protecting them.
5. Being outdoors revitalizes my spirit. I enjoy the quiet, solitude, fresh air, and magnificence of the natural world that the wilderness has to offer. I have a great reverence for the outdoors and all its creatures. I have been an outdoors person most of my life and participate in such activities as fishing, hunting, hiking, skiing, rafting, and photography to enhance my outdoor adventures. It is always exciting to see fish or wildlife in their native habitat and especially exciting to watch when animals interact with each other.
6. I am actively involved in protecting these values, as a volunteer for groups like the Sierra Club, and working with public agencies as well. As a volunteer, I have participated with the Forest Service in two weeklong service trips down the Main Salmon River in the Frank Church-River of No Return Wilderness to pull invasive weeds from the river corridor. I have also volunteered with the IDFG to collect sagebrush seed for replanting on burned landscapes.
7. Approximately two years ago I participated in a Sierra Club outing to view wolves in the Stanley area. It was very exciting to see several wolves on that outing.
8. Wolves are the top predator within their habitats, including central Idaho where their existence is important for the proper functioning of the ecosystem (such as moving elk out of riparian areas to allow streamside trees and shrubs to mature thereby reducing stream bank erosion, reducing stream temperatures, and thereby improving fish habitats).
9. Wolves belong in the wilderness, they are a natural part of the ecosystem; and to me, an area like the Frank Church Wilderness is not complete without

wolves. The wolves help balance the ecosystem, and the interactions between wolves and their prey would be very interesting to watch and photograph.

10. I am planning to travel into the Frank Church-River of No Return Wilderness near the Middle Fork Salmon River during the period February 24-26 (or 27) this year, in order to view and photograph wolves and wildlife in their natural setting in that area. I am planning to fly into the Bernard airstrip near the Flying B ranch with two of my friends from Boise, who are also avid outdoor enthusiasts. We will be establishing a base camp and taking side trips from that camp into the neighboring areas where we expect elk will be congregating and thus wolves may also be present.
11. We chose to visit this area because the geography and habitat there are known to be critical elk winter habitat. We should be able to establish a camp to quietly view, observe, and photograph the elk, deer, wolves and other wildlife without disturbing them.
12. I understand that fixed aircraft can lawfully land and take-off from the Bernard airstrip under the legislation that established the Frank Church Wilderness, and that the Idaho Department of Fish and Game (IDFG) will be conducting aerial elk survey during this period. Because the airstrip landings are at a known location and the elk surveys are at higher elevations, I don't believe these aircraft operations will be invasive or disturb the wildlife that we will be viewing some distance away from the Bernard strip.
13. However, I understand that IDFG also intends to opportunistically dart and collar wolves in the Frank Church Wilderness, which will involve helicopters pursuing wolves, hovering close above the ground, and landing in the wilderness.
14. Helicopters conducting low elevation pursuits, hovering, and landing in the wilderness will scare off the wildlife (including elk and wolves) we have come to view and ruin my viewing of them. The wolves and wildlife can travel much further in a day's time than we can on foot. The IDFG helicopter operations in the wilderness could actually ruin the purpose of our entire trip.
15. If I experience the IDFG helicopter operations pursuing wolves and scattering wildlife in the wilderness, it would destroy my once in a lifetime opportunity to observe and photograph wolves, elk, and deer in their natural setting. It would also destroy the solitude and quiet that I seek from the wilderness; and irreparably defeat the purpose of my experience of the Frank Church Wilderness during the winter.
16. I believe that the use of helicopters to dart wolves and land in the Frank Church Wilderness is the use of mechanized equipment that is contrary to the

intention of the Wilderness designation, and is wholly inappropriate in a congressionally designated wilderness area.

17. Because the Forest Service has approved helicopter low level flights and landings in the Frank Church Wilderness, I feel I will be directly harmed by this action unless the Court issues an injunction to stop it.

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct. Executed the 1st day of February, 2010, at Boise, Idaho.

/s/ _____
Lon Stewart