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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
BRENDA HANLEY**

I, Brenda Hanley, declare:

1. My name is Brenda Hanley, and I reside in Lewiston, Idaho, with my partner, John Hillman.

2. I have a BA in Geography and Land Studies, with additional graduate work in Natural and Cultural Resource Management, both from Central Washington University. My graduate coursework revolved around Resource Management Law and Policy, and I have personally given presentations on the Wilderness Act, the history, mission statements, and the management of the federal land management agencies of the National Park Service, the USDA Forest Service and the Bureau of Land Management. I am very familiar with the overarching management goals, constraints, and management strategies of each agency. Additionally, I grew up very much involved with the varieties of resource husbandry and stewardship issues, as my family members, as well as our family friends are wildlife, agriculture, and forestry research professors at a variety of institutions of higher education throughout the West. I have been fortunate to have spent every spare second of my entire life in the backcountry, often for months at a time. Recognizing that math is the language of nature, I am currently working on second bachelors degree in Mathematics and Physics at Lewis-Clark State College, in preparation to go on to graduate work in the field, eventually to become an Astrophysicist.

3. I have previously worked as a field biologist studying desert tortoises in the Mojave Desert, California, with the National Park Service in Yosemite National Park (noxious weeds), and for the Montana Department of Agriculture (noxious weeds).

4. I also worked for several years for the U.S. Forest Service out of the Krassel Ranger District on the Payette National Forest, in McCall, Idaho. Most of the

acreage of the Krassel Ranger District lies within the Frank Church-River of No Return Wilderness, bordered on the east by the Middle Fork of the Salmon River.

5. As a Forest Service seasonal employee, I led the backcountry noxious weed crew, removing and treating noxious weeds within the Frank Church Wilderness. We typically spent 10 days in the backcountry each hitch, and usually flew in and out of McCall, Idaho.

6. Most of the time, my “crew” consisted of myself and one co-worker, and we covered the entire ranger district. Being only two, and on foot, we saw an amazing number of wolves over those years. Seeing wolves (or entire packs) was more common than seeing moose - often in the spring we had sightings every hitch. The most consistent wolf sightings occurred on Big Creek (a tributary to the Middle Fork Salmon River), near Cabin Creek and Goat Basin. We even witnessed four wolves chase and eventually take down a single deer at Cabin Creek.

7. In addition to the Krassel ranger district trail system, I have extensively walked the Middle Fork Salmon River trail system in the Salmon Challis National Forest as well, but mostly for recreational purposes.

8. The earliest I have been into the Frank Church Wilderness was in the first week of April, at Campbell's Ferry on the Main Salmon. In fact, we saw a pack of three wolves that hitch, one jet black. At the other end of the year, John Hillman and I boated the Main Salmon in December '09, just barely in front of the annual freezing over of the river. Although we did not see wolves then, we did see plenty of evidence of them.

9. I am eagerly looking forward to going back into the Frank Church Wilderness in March this year with John Hillman, during our spring break. Being

there in March will be a new and fantastic experience.

10. We plan to spend about a week camping and looking for wolves and elk herds in and around the Middle Fork Salmon and tributaries; and may go up Big Creek if it appears that will be favorable for wolf sightings.

11. Through my years of experience in the Frank Church Wilderness, I treasure the quiet, solitude and natural beauty that it offers. In the Frank, you can spend days, weeks, or even months without seeing another soul. The Frank is unlike any other place I have ever been in the lower 48 states. The hills reach for miles, culminating in the most impressive peaks. The creeks flow as if they don't have a care in the world. The wildlife still stop and look at you, wide eyed, as if they are thinking, "hey, I remember seeing another one of you, I think, long ago..." Mostly they are just as surprised as you are when you run into them, often going about their lives with humans so far off their radar that you end up a foot away from a moose, or bear, or elk, before either of you realize you are sharing the spot with something wildly different from yourself. Here, the landscape is truly a Wilderness by its very definition; "...untrammelled...where man is a visitor who shall not remain." Here, the wildlife reflect that in their actions, like no other wilderness area I have ever spent time in. We don't own any part of this place, and here, you truly feel like a guest instead of the host. The course of nature is being played out, as it should, in an area big enough to allow it to. Idaho is truly fortunate to have such a place. Wolves are an essential part of this wilderness ecology, always have been, always will be, regardless civilization's opinions about them. To me, seeing them standing, staring, stoic, watching you far before you notice their presence is the ultimate wilderness

experience. This is what wilderness is all about. Feeling small. Keeping proper perspective.

12. Allowing Idaho Fish and Game Department to use helicopters in the Frank Church Wilderness to pursue wolves, and to dart and collar them, is completely contrary to my understanding of the purpose of the Wilderness Act and the principles that the Forest Service is supposed to use in managing the Frank Church Wilderness to protect and preserve quiet, solitude, and the natural values of the Wilderness.

13. If Idaho Fish and Game Department proceeds with its plans to take and land helicopters in the Frank Church Wilderness to dart and collar wolves this winter, it will set a precedent that could allow much more use of helicopters in the Wilderness in the future, and will completely undermine the reasons why we congressionally designated it in the first place. There is no excuse for designating a place a Wilderness, then managing it only as long as it is convenient to do so.

14. The IDFG helicopter operations this winter, if not stopped by the Court, will also irreparably damage my trip into the Middle Fork with John, and interfere with our enjoyment of wolves and wildlife in the Wilderness setting.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of January, 2010 at Lewiston, Idaho.

/s/ Brenda Hanley
Brenda Hanley