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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  
DALE GROOMS**

## DECLARATION OF DALE GROOMS

I, Dale Grooms, declare:

1. My name is Dale Grooms. I make this declaration based on my personal knowledge.
2. I have been an Idaho resident since 1973. I now live just outside McCall, Idaho.
3. Outdoor recreation is very important to me. I was born in Montana and grew up spending the weekends camping, hunting and fishing in the mountains of Montana, Idaho and Wyoming. I am an avid user of Idaho and other western public lands. I run, ski, hike, bike, climb and camp, in all seasons of the year.
4. I am a conservationist. I have studied and observed first-hand the ecology of the western landscapes enjoyed here in Idaho and across the West. For the last 12 years I have been very active in seeking to preserve and protect the fish and wildlife species and their habitats here, by active restoration and working with non-profit conservation groups and state and federal agencies.
5. For 10 years, I have been involved with a 501(c)(3) tax exempt non-profit group called Wilderness Volunteers, which involves trips where I and 8-10 other volunteers typically spend a week repairing trails, removing weeds, and otherwise helping maintain and restore the wilderness areas and their recreational and ecological values. I have personally led trips into the Bighorn Crags and Main Salmon River areas of the Frank Church Wilderness, and at least a dozen other trips into the Idaho backcountry. As a leader and as an individual I regularly visit wilderness and backcountry areas of Idaho, including the Frank Church-River of No Return Wilderness. I have taken numerous backpacking trips into the Frank Church Wilderness, and will continue doing so for the foreseeable future
6. I am also a long-time member of Western Watersheds Project, which I joined more than a decade ago because of a backpacking trip into wild areas that I assumed to be pristine but were in fact totally trashed by privately-owned cattle. I currently am a volunteer staff member of Western Watersheds Project's Western Idaho Office, with the title of Western Idaho Data Specialist. My position involves primarily monitoring and documenting conditions on livestock allotments on public lands in Western Idaho.
7. I have been climbing, kayaking, biking and backpacking in all areas of Idaho from border to border in all seasons. Visiting the Frank Church and other wilderness areas is deeply important to me. I find great emotional refreshment and satisfaction from experiencing the wild state of nature that I find in the Frank Church and other wilderness areas, including the solitude,

quiet, and absence of human development. I recently began selling commercially in the McCall area my photographic work from decades of backcountry photos of landscapes, birds, fish, and wildlife, and truly enjoy experiencing the vibrant natural ecosystems.

8. I am a United States Air Force veteran of nine years, with one year served during active combat in Vietnam. I am fully aware of the intrusion that the mere presence of a helicopter brings to a landscape. I again experienced the impacts of helicopters last year when an agency I believe was affiliated with the Interagency Fire Center out of McCall chose to do some helicopter drop off and retrieval practice near a popular mountain biking trail where I was riding. The noise and rotor wash terrified our 100 pound dog (a working guard dog breed Kuvasz) so badly we had to abort that portion of the ride. I find this type of disturbance completely unacceptable for humans, their companions and the wildlife to experience the same fear and noise in the backcountry of Idaho as was in Vietnam.
9. I do not fear for my safety or my dog's safety in the backcountry despite the presence of wolves; in fact I always look for wolves when I am hiking and backpacking around Idaho, and merely take commonsense precautions such as controlling my dog in wolf territory. I have an emotional and intellectual satisfaction when I hear or see wolves.
10. One of my goals is to be able to photograph wolves in their wild setting. To do that I am planning to fly into the Frank Church Wilderness, weather permitting, sometime between the last week in February to the first week of March this year to photograph wolves and elk in their natural habitat and to enjoy the solitude of the wilderness. The quiet is a key feature of wilderness for me and others--I have had people on my trips thank me just for bringing them to someplace quiet.
11. I will be using a private plane and pilot to get access to a public landing strip along the Middle Fork Salmon River the Flying B Ranch; from there I intend to snowshoe or hike in a 20 mile radius of the ranch, depending on local information on locations of elk herds and/or wolf packs. I will be camping and provisioned for 7 to 10 days, with the plan to fly out upon completion of the trip.
12. I am very concerned about the Forest Service's December 2009 decision allowing the Idaho Department of Fish and Game (IDFG) State of Idaho to operate and land helicopters in the Frank Church Wilderness to locate, dart, and collar wolves. I understand that the helicopters will be operating in the same area of the Middle Fork Salmon where I will be, and at the same time I will be there, since that is where big game populations and wolves are likely to be found. My intent is to also photograph using both still and video

photograph any use of helicopters harassing wildlife or otherwise intruding into the wilderness.

13. If I experience helicopter operations in the wilderness such as flying low, hovering and landing, it will leave me personally upset and angry, and will irreparably taint and injure my experience of the Frank Church Wilderness during the winter.
14. I have personally been in the Frank Church Wilderness at least 5 times from the 1980s to date either hiking or kayaking. I spend on average 60 nights a year in the backcountry all over Idaho and the western states, including trips under winter conditions such as a Jan. 1 ascent of Mt Borah and winter ski trips into the Sawtooths. I plan to continue my backcountry excursions as long as my health will permit.
15. Because the Forest Service has approved helicopter low level flight and landings in a designated 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 this 30th day of January, 2010, at McCall, Idaho.

/s/ Dale Grooms  
Dale Grooms