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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  
JEFF HALLIGAN**

I, Jeffrey Dean Halligan, declare:

1. My name is Jeffrey Dean Halligan. I have been an Idaho resident since 1969. I now live in McCall, Idaho.

2. I was grew up in Boise and spent my summers and winters recreating and playing in the mountains of Idaho. I grew up watching the deer and elk along Highway 21 and Arrowrock Reservoir as they spent the winter in the lower elevations. I started bow hunting for these animals when I turned 12 and continued this passion well into my 40s. I also fed and donated money to feed these animals during hard winters. My passion for the mountains and the wild places increased after my first hike across the Idaho Primitive Area at age 12. From that point on I spent much of my free time moving through the forests and mountains in search of remote and beautiful places.

3. After spending several years trying to figure out how to make a living working in the Idaho mountains, working for the Forest Service, packing mules/guiding hunters for outfitters, running rivers, and finally working for the ski industry, I met a woman who shared my passion for the mountains and wild places. Together we got jobs with the Forest Service and moved to Chamberlain Guard Station, in the heart of the Frank Church River of No Return Wilderness. We spent the next 18 years working for the Forest Service all over the state of Idaho, most of it with in designated Wilderness.

4. Working all of those years in Wilderness has given me a great appreciation for the need to have these lands. These are areas where the wildlife can live with minimal intrusions from man, where they can be wild most of the time. Checks and balances are closer to natural than outside the Wilderness where depredation from roads,

fences and disease are more prevalent. These areas are a great place to go to watch the wildlife be wild.

5. Wilderness is also an area to go to experience the peace and quiet that is so hard to find anywhere. With the public lands in America being overrun by motorized vehicles, designated Wilderness is one the last places to go where quiet can be found. The Frank Church River of No Return Wilderness is unique, with some of the grandfathered airstrips that if abused can take away from the experience. I can remember being down on lower Big Creek in the Frank Church when a Fish and Game helicopter, on a salmon redd counting flight, flew right up the creek about 20 feet off of the water, and about 50 feet from my horses, mules and me. Being almost 30 miles from the trailhead and 2 days into the trip, this set a very bad feeling in me. I heard helicopters for 3 days, which is not what I expected or wanted when I planned that 10 day trip.

6. I am planning a 5 day trip into the Middle Fork of the Salmon River in late February to watch some wildlife and hike the river trail. Some friends and I are also planning a ski trip up to Big Baldy in early March. I am concerned that the decision of the Forest Service to allow the Fish and Game to fly and land helicopters to collar wolves in the Wilderness will ruin my trip. I don't believe that allowing this to happen follows the Wilderness Act, the Forest Service's *Minimum Tool* analysis, or the spirit of the Wilderness.

7. I request that the Court issue an injunction to stop the Fish and Game wolf collar helicopter operations in the Wilderness during February and March, to protect the wilderness values that I treasure and to ensure that I am not irreparably harmed in my enjoyment of the Frank Church Wilderness.

I declare under penalty of perjury that the foregoing is true and correct. Executed  
this 2<sup>nd</sup> day of February, 2010, at McCall, Idaho.

/s/ \_\_\_\_\_  
Jeff Halligan