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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
JOHN W. HILLMAN**

I, John W. Hillman, declare:

1. My name is John Wade Hillman, and I reside in Lewiston, Idaho with my partner, Brenda Hanley.
2. I am a member of The Wilderness Society and support other conservation groups and causes.
3. I have a BS in biology and am currently studying towards a BS nursing degree at Lewis-Clark State College.
4. I have worked as a wildlife field biologist and as a professional river guide for more than 15 years. Since 1999, I have been a seasonal boatman and sweep boat driver for OARS-Dories, Inc., a Lewiston-based river outfitter.
5. I have completed approximately 75 trips down the Middle Fork Salmon River, and 20+ trips on the Main Salmon River within the Frank Church-River of No Return Wilderness. As a wilderness river guide in the Frank Church Wilderness, I am very familiar with the Forest Service's requirements for visitors using the Middle Fork Salmon and other areas; I teach and observe "leave no trace" camping and other values to help preserve the wilderness values and heritage established by the Wilderness Act.
6. My earliest launch date on the Middle Fork Salmon River was March 18th one year, flying into Indian Creek to start the winter float; and I have run the Middle Fork in the fall as late as October. In December 2009, I boated the Main and Lower Salmon River with Brenda. This winter trip was a fantastic experience for us, as we saw lots of wildlife and few other people.
7. I also hike and backpack in the Frank Church Wilderness. Recently, Brenda and I hiked from Marsh Creek at the headwaters of the Middle Fork Salmon River at the southeast corner of the Frank Church Wilderness, to the Big Horn Crags in the northeast quadrant of the Wilderness. This trip took over two weeks, starting Aug. 18, 2009, and we averaged 19 miles a day. I am fortunate to be able to say that I am one of few people who has had the honor of seeing a wolverine in the wild; 20 feet away on the banks of Ship Island Lake in the Big Horn Crags.
8. I have a keen interest in the Frank Church Wilderness, and in observing wildlife – including wolves – in the wilderness. I have seen wolves and their sign in the Frank Church Wilderness several times, including along the Middle Fork Salmon River in 2009, upstream from Flying B Ranch near Little Bear Creek; in Ayers Meadow and also near Boundary Creek. I have also witnessed wolves howling from several locations along the Salmon River on many occasions.
9. I am planning to take a winter camping trip with Brenda again into the Frank Church Wilderness during the period March 12-18 this year, which is our spring break week, for the purpose of looking for wolves and other wildlife there.

10. We will be flown by a friend, who is a very experienced backcountry pilot and has his own plane, in and out of a public airstrip along the Middle Fork Salmon River, which may be Indian Creek, Thomas Bar, Mahoney Creek, or Bernard Creek – we will select the exact location depending on weather, snow conditions, and proximity of elk populations and wolves. We may also go into Big Creek, depending on conditions.

11. We will be back-country camping and hiking or snowshoeing along the Middle Fork Salmon and tributary streams, and up onto ridges and exposed slopes, looking for signs of big horn sheep, mountain goat, elk and wolves; and we intend to spend as much time as possible listening for and viewing wolves and their interactions with other wildlife. We are excited to witness these wonderful creatures and others as well.

12. If Idaho Fish and Game Department is allowed to take helicopters into the Frank Church Wilderness to dart and collar wolves this winter, it would disrupt and even destroy our ability to observe and enjoy wolves and wildlife in the wilderness setting. If the helicopter operations occur while we are there, the noise and intrusion will obviously shatter the quiet and solitude that we seek in wilderness; and scare away wolves and wildlife.

13. Even if the IDFG operations occur before we arrive, the effects of IDFG helicopter pursuit and shooting of wolves with high-powered rifles (loaded with tranquilizer darts) and landing in the wilderness may result in scaring away both wolf and elk populations from the areas they otherwise would be found; and thus prevent or impair our ability to quietly watch and observe them in the natural setting.

14. I believe the use of helicopters to hover and land in the Frank Church Wilderness is completely contrary to the Wilderness Act and the management requirements of the Frank Church Wilderness; and that it poses irreparable harm to my own use and enjoyment of the Wilderness and to the wilderness values for which the Frank Church was protected by Congress.

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

A handwritten signature in black ink, appearing to read "John W. Hillman". The signature is fluid and cursive, with a large initial "J" and "H".

John W. Hillman