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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 M. ROBISON**

I, John M. Robison, declare as follows:

1. I am the Public Lands Director for the Idaho Conservation League, a 501c(3) non-profit organization based in Boise, Idaho. Since 1973, the Idaho Conservation League has worked to protect Idaho's clean water, wilderness, and quality of life through public education, citizen action and professional advocacy. As Idaho's largest state-based conservation organization we represent over 9,500 members, many of whom have a deep personal interest in protecting Wilderness values.

2. I received my Bachelor of Arts Degree in 1989 from Bowdoin College and a MS Degree in Botany in 1999 from the Field Naturalist Program at the University of Vermont.

3. My work experience and graduate studies in natural resource issues extend from 1994 to the present. In 1994 to 1996 I worked as a ranger at Stanford University's Jasper Ridge Biological Preserve. From 1996-1997 I was a graduate student at Professional Residency in Environmental Education at the Teton Science School, and completed my Masters Degree in Botany in 1999 at the University of Vermont. From 2000 to 2001 I worked as the River Program Coordinator at the Canyonlands Field Institute in Moab, Utah. Since 2002 I have been employed at the Idaho Conservation League in the Public Lands Program.

4. My graduate studies included trapping, radio collaring, radio tracking and snow tracking pine martens in the Bridger Teton National Forest. My Final Project for my Masters Degree consisted of a winter tracking study to determine if the habitat preferences of coyotes changed during different snow pack conditions.

5. The Idaho Conservation League has a long history of involvement in Wilderness management issues. The ICL was the only statewide conservation organization with paid staff that worked towards the passage of the 1980 Central Idaho Wilderness Act that designated the Frank Church River of No Return Wilderness (FCRNRW).

6. Since that time, the ICL has closely tracked land management decisions in the FCRNRW. We have commented on numerous management plans, including the FCRNRW Management Plan, Forest Plans for individual National Forests within the FCRNRW, and noxious weed management plans. In addition, we commented on individual proposals such as the Golden Hand mine and previous and current requests by the Idaho Department of Fish and Game (IDFG) to land helicopters to collar wolves in the FCRNRW.

7. Idaho Conservation League members ascribe great value to the FCRNRW. Our members use the FCRNRW in a variety of ways, including day hiking, backpacking, photographing, nature studies, field sketching, bird watching, wildlife watching, hunting, fishing, camping, skiing, snowshoeing, kayaking, canoeing, rafting and serving as a outfitters and guides. Even members who do not visit the FCRNRW still assign value to its existence.

8. Based on our experience reviewing proposals within Wilderness areas, we concluded that the current proposal from IDFG to land helicopters to collar wolves does not meet the Minimal Tools requirement of the Wilderness Act or the FCRNRW Management Plan. We believe that helicopter use of this nature will indeed seriously detract from wilderness values.

9. IDFG states the information from helicopter-supported monitoring will support wolf recovery efforts and provide a better understating of wolf behavior and predator-prey relationships to assist with wolf and wilderness management. We conclude that traditional, ground-based trapping methods could provide the information desired by IDFG.

10. ICL also determined that the Forest Service erred by analyzing IDFG's proposal under an expedited Categorical Exclusion that limited analysis of additional alternatives that we felt were feasible and prevented further discussions through the administrative appeals process. In our opinion, proposals with this level of attention and controversy and complexity are best handled through an Environmental Assessment or Environmental Impact Statement. In addition, the Idaho Conservation League often uses the administrative appeals process to resolve outstanding issues of disagreement without resorting to litigation. We were not afforded such opportunities in this instance.

11. The ICL is also concerned that by authorizing a special use permit for this proposed activity, the Forest Service will be setting a precedent that will allow further use of mechanized equipment in the FCRNRW and will grant similar proposals from other agencies and entities.

12. The Idaho Conservation League has a long history of involvement in wildlife management issues. The ICL helped craft the 2002 Wolf Conservation and Management Plan which established the IDFG as the agency responsible for wolf management following delisting. The ICL also participated as a stakeholder in developing the 2008 Wolf Population Management Plan and has utilized other

opportunities to comment on annual plans. Members of the ICL and I have testified at numerous public meetings regarding wolf management issues.

13. Although our comments have recommended implementing the particulars of IDFG's wolf management plan differently, the ICL has consistently supported state management of recovered wolf populations since 2002 and has not participated in legal efforts to re-list the species under the Endangered Species Act.

14. The ICL recognizes that monitoring is an essential component of wildlife management and supports such efforts as long as the research methods are consistent with land management planning.

15. The Idaho Conservation League staff and members have participated in a variety of wildlife education and viewing. Dating back to 2002, we have featured a wolf presentation at our annual Wild Idaho conference at Redfish Lake Lodge, Stanley. These events have included presentations on wolf management and ecology from the US Fish and Wildlife Service and the Idaho Department of Fish and Game. Our members have repeatedly seen wolves on these field trips. Last year, our members also participated in two wolf-tracking field trips hosted by Hailey-based outfitter, Sun Valley Trekking and sponsored in part by the ICL.

16. I have personally visited the FCRNRW on a number of occasions, including float trips down Bear Valley Creek, Marsh Creek, Middle Fork Salmon River, Loon Creek, Big Creek, the South Fork of the Salmon River, and the Main Salmon.

17. Key points of interest for me are the opportunity to watch and track wildlife, including wolves, and the solitude provided by the FCRNRW.

18. My past experiences in the FCRNRW have all been in the spring, summer and fall. I am looking forward to visit the FCRNRW later this winter in hopes of seeing more wildlife when they are concentrated in critical winter range areas and thus more visible. I am planning to go into the Middle Fork Salmon River area in the third week of February, 2010, specifically to look for wolves and wildlife in that area. If IDFG is allowed to conduct helicopter operations in the Wilderness to pursue wolves and land within the Wilderness to collar wolves, it will degrade and injure my ability to observe and enjoy wolves and other wildlife in the wilderness setting.

19. Another reason to visit the FCRNRW in the winter is because of the increased opportunities for solitude. In the summer, there are large numbers of floaters, hikers and air traffic in the river corridor but the chances of encountering other parties is greatly reduced for this time of year. Again, if IDFG conducts the low-level helicopter hovering and landings for its proposed wolf collaring operations, it will substantially impair my experience and ruin the wilderness values of quiet, solitude, and natural setting that I am seeking.

20. I am interested expanding ICL's involvement in citizen science programs. At the Teton Science School I designed and implemented field monitoring programs in which visiting students recorded wildlife tracks along track transects in Grand Teton National Park and participated in pine marten trapping project. This information was provided to the US Park Service and US Forest Service.

21. Idaho Conservation League members and volunteers have provided information on wildlife numbers and locations to management agencies. In the summer of 2007, my girlfriend and ICL member Angela Hart observed a pack of wolves on the

outskirts of the wilderness boundary near Stanley, Idaho. I suggested that she describe her experience to the Idaho Department of Fish and Game and her report formed the basis for that year's pup count for that pack.

22. Because of the remoteness of the FCRNRW, many users rely on existing airstrips, which were authorized in the FCFNRW legislation, as "trailheads." I have flown in and out of these airstrips and understand that a certain degree of air traffic is to be expected. Excessive low-elevation flying and landings beyond those normally authorized, however, can substantially impair my enjoyment of Wilderness resources. For example, in 2007 I filed a verbal complaint to the ranger at the Chamberlain Basin guard station regarding one plane that repeated practice "touch downs" at the airstrip which are beyond the bounds of normal use.

22. Given the importance of the FCRNRW to myself and so many other Idaho Conservation League members and supporters, the IDFG wolf collaring operations using helicopters within the Wilderness should be enjoined, to prevent irreparable harm to us and to the wilderness values that Congress has protected there.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct. Dated this 31st day of January, 2010

s/John Robison  
John Robison