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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
MARK MENLOVE**

I, Mark L. Menlove, declare:

1. I am Executive Director for Winter Wildlands Alliance (“WWA”), in Boise, Idaho. I am a member of WWA, The Idaho Conservation League, and The Wilderness Society.

2. Formed in 2000, WWA’s mission is to promote and protect winter wildlands and a quality human-powered snowsports experience on public lands. WWA is the first and only national advocacy organization working on behalf of skiers, snowshoers, snow boarders, winter hikers, and other non-motorized winter recreationists to address national issues that impact winter wildlands. WWA represents the interests of 37 member groups and their 27,000 constituents, plus WWA’s own 1,300+ individual members. WWA is headquartered in Boise, Idaho. In my capacity as Executive Director, my responsibilities include monitoring state and federal land use planning and policies and assisting our members, grassroots groups, and affiliate organizations in participating in planning processes on federal lands.

3. I and many other WWA members are very concerned and disturbed about the Forest Service’s recent decision allowing Idaho Fish and Game to land helicopters into the Frank Church-River of No Return Wilderness in winter 2010 in order to dart and collar wolves in the wilderness.

4. The solace of wintertime in the Frank Church Wilderness is the epitome of what WWA and our members work to protect and to experience. WWA members go into the Frank seeking a winter wilderness experience with the understanding that it isn’t supposed to be easy or convenient – that’s part of the appeal. We go there to challenge ourselves and to experience wild country on its own terms. Using helicopters in this case

violates the very wilderness values that the Frank Church Wilderness was set aside to protect.

5. WWA also places significant organizational focus on connecting our members and constituents with winter wildlife. In conjunction with The Idaho Conservation League and with Sun Valley Trekking (one of our small business partners), WWA organizes and promotes an annual one-day wolf tracking hike in the Sawtooth Mountains. Sun Valley Trekking's outfitter and guide service has been exploring wild landscapes since 1982. They run back-country ski expeditions, snowshoe trips, expeditions overseas, and they have recently added wolf ecology tours to their list of offerings for locals and tourists. The goal of the wolf tracking tours is to learn more about wolves, wolf management, and opportunities for wildlife-based tourism. Dates for this year's tours are April 3 and April 10, 2010.

6. In addition, WWA sponsors a "backcountry scientist" program that engages backcountry and Nordic skiers, snowshoers and winter hikers as volunteer citizen activists in rare carnivore ecology, conservation and research. Nearly 30 WWA members and volunteers gathered January 31 in West Yellowstone for the one-day training and field session.

7. Aside from my professional capacity with WWA, I spend a great deal of time with my wife and children backcountry skiing and snowshoeing, camping, fly fishing, viewing wildlife and otherwise recreating and enjoying the public lands of Idaho. The Frank Church Wilderness is one of our favorite places in the world. In fact, my wife's history with the Frank Church Wilderness – growing up her family made an

annual trip into the Frank from their home in Louisiana – is one of the primary reasons we moved to Idaho to raise our family.

8. My wife and I are planning on taking a long winter backpacking trip by snowshoe into the Frank Church Wilderness on or around February 21, 2010, for the specific purpose of going to locations along the Middle Fork Salmon River where wildlife and wolves are congregating.

9. We are taking this trip specifically because we want to see and observe wolves in the wilderness. We are keenly interested in seeing how wolves interact with (and prey upon) other wildlife, particularly deer and elk populations. Because those wildlife tend to congregate in lower elevations areas along parts of the Middle Fork, we intend to plan our trip to target those locations.

10. I believe it is likely, therefore, that we will see and experience the impacts of the State of Idaho's helicopter operations to dart and collar wolves in the Frank Church Wilderness. Hearing and seeing the helicopters hovering close over the ground, shooting at wolves, and landing in the wilderness so that personnel can inspect, weigh, and collar the tranquilized wolves, would utterly disrupt and destroy the solitude and other wilderness values that we are looking to experience on our trip. I also think that these operations will scare and disturb wolves and other wildlife populations, and again destroy my aesthetic and recreational enjoyment of the Wilderness Area.

11. Unless the Court issues an injunction to stop the helicopter operations in the Wilderness, I will thus suffer irreparable harm.

I declare under penalty of perjury that the foregoing is true and correct. Executed
this 1st day of February, 2010, in Boise, Idaho.

/s/ _____
MARK L. MENLOVE