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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)
ROADS 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
DANA DOHERTY
MENLOVE**

I, Dana Doherty Menlove, declare:

1. My name is Dana Doherty Menlove, and I reside in Boise, Idaho. I am a member of Winter Wildlands Alliance.
2. For twenty years I have been a back country skier, mainly in Idaho and Utah. I love the wild places I can access and enjoy in the winter by skiing and snowshoeing and I treasure the wildlife and solitude. I am a member and supporter of Winter Wildlands Alliance because it helps protect these places and their wilderness values.
3. Though I was raised in Louisiana, I spent a great deal of time during my formative years in the Frank Church-River of No Return Wilderness, a national wilderness treasure. My family owned a share of the Flying B Ranch on the Middle Fork of the Salmon River, and I have spent a lot of time exploring the country around there. In major part because of my strong connection to Idaho wilderness and the way it sustains me and my family, we moved to Idaho.
4. I now have two children of my own and as a family we regularly take trips into the back country to have aesthetic, recreational, and educational experiences that only wilderness can provide.
5. My husband and I are planning to take a snowshoeing/backpacking trip within the Frank Church Wilderness on or around February 21, 2010, to view the wildlife that gathers around the Middle Fork of the Salmon River during the winter season.
6. Our plan is to locate areas where deer, elk, moose, and other wildlife congregate in winter; and to observe, photograph, and study relationships between predator and prey in winter wilderness.
7. I am particularly eager to observe wolves finding and taking prey along the Middle Fork, and to observe in general other animals' reactions to wolf behavior. I believe wolves belong in wilderness; they are a crucial part of the ecosystem. Further, wolves represent in significant ways a wildness that is central to my experience of wilderness and use of the Middle Fork area.
8. I understand, however, that the Forest Service is allowing the State of Idaho to fly helicopters into the Middle Fork area this winter, in order to locate and tranquilize wolves and then land the helicopters so that agency personnel can inspect and collar the wolves.
9. I am very concerned about this proposal, which would literally ruin the trip my husband and I are planning to take into the Middle Fork, and thus cause me irreparable emotional and aesthetic harm.

10. I know that it is allowable to fly into established landing strips in the Frank Church Wilderness, such as the landing strip I flew into at the Flying B Ranch often during my youth. It is, however, a very different thing for the State of Idaho to fly helicopters into the wilderness – up and down the Middle Fork corridor – away from the landing strips, where the helicopters will hover over the ground and shoot at wolves, and then eventually land so that their staff can collar them. Helicopters are extremely loud and intrusive, and using them to chase wolves in wilderness violates the heart and soul, and the established law, of wilderness.
11. Because my husband and I are travelling into the Middle Fork area to view wolves and their prey, if the State of Idaho continues with its plan to use helicopters in locating and collaring wolves, it is likely that we will see and experience the helicopters invading this pristine wilderness and its wildlife.
12. I would be personally upset and angry, and it would irreparably taint and injure my experience of the Frank Church Wilderness during winter, if we are subjected to helicopters operating in the area where we will be exploring this winter.
13. Unless the Court issues an injunction to stop the helicopter operations in Wilderness, I will thus suffer irreparable harm.

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

/s/ _____
Dana Doherty Menlove