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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
EDWINA ALLEN**

I, Edwina Allen, declare:

1. My name is Edwina Allen, and I reside in Boise, Idaho.
2. I have been a member of the Sierra Club since 1968, and have served in leadership roles with the local Sierra Club chapter for much of that time. I am currently serving as Chair of the Idaho Chapter of the Sierra Club, which is a volunteer position.
3. The Sierra Club was founded in 1892 by John Muir and others. It is the oldest, largest, and most influential grassroots environmental organization in the United States. The Sierra Club has at least 2,300 members in Idaho. Nationally, the Club has over 600,000 members; and of course, many of these come to Idaho to recreate and/or work.
4. I and many other Sierra Club members whom I know – including many members of the Idaho Chapter – are very concerned and disturbed about the Forest Service's recent decision allowing the State of Idaho to take helicopters into the Frank Church-River of No Return Wilderness (FC-RNR) in winter 2010 in order to dart and collar wolves in the Middle Fork Salmon River portion of the wilderness. During the public scoping period over 100 of our members commented in opposition to the proposed action by the Forest Service.
5. The Frank Church-River of No Return Wilderness, designated by the 1980 Central Idaho Wilderness Act, is one of the great jewels of our national wilderness system. (Initially named the River of No Return Wilderness, it was renamed in 1984 the Frank Church-River of No Return Wilderness in honor of the role Idaho's Senator Frank Church played in its creation.) The Sierra Club was intimately involved in the discussions about how this Wilderness was to be managed, especially for the Middle Fork and Main Salmon Rivers. Sierra Club staff was in Washington, DC, for weeks during the final negotiations representing the conservation community on these wilderness management issues. Allowing helicopters to land and collar wolves in the FC-RNR is not consistent with what was agreed upon for management for the FC-RNR.
6. Allowing helicopters to be used in the wilderness for these wolf control purposes violates the letter and spirit of the 1964 Wilderness Act. Our members here in Idaho find this proposed violation of the Wilderness Act especially egregious, since Idaho's Senator Frank Church led the fight on the Senate floor for the passage that legislation.
7. I am planning to go into the Frank Church-River of No Return Wilderness during this winter, specifically to look for and observe wildlife and wolves there. I will be going with my husband and another couple, and we will drive

to or near the end of the Salmon River road, near Shoup, Idaho; and snowshoe or hike into the Wilderness Area from the Corn Creek campground and boat launch area there. We will determine exactly where to go in the Frank Church Wilderness based on weather conditions and the latest information we can obtain about where wolves and big game are located in that area.

8. Other Sierra Club members will also be taking trips into the Frank Church Wilderness this winter, including in and the Middle Fork Salmon River. These individuals are experienced in backcountry winter travel; and they will be camping and hiking or snowshoeing into areas where elk and other big game populations are concentrated, to observe the wildlife – including wolves expected to be there. Again, the groups will determine their precise locations shortly before leaving, based on the latest information of where the big game and wolf populations are located.
9. Sierra Club members, including myself, face irreparable harm to our wilderness experiences if Idaho Fish and Game is allowed to conduct helicopter operations and landings in the Frank Church Wilderness to pursue, dart, and collar wolves. The helicopters invading the wilderness will destroy the solitude and other wilderness values that Congress has protected through the Wilderness and Central Idaho Wilderness Acts.
10. Unless the Court issues an injunction to stop the helicopter operations in the Wilderness, myself, our members – and the Sierra Club itself – will 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.

/s/ _____
Edwina Allen