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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

WOLF RECOVERY FOUNDATION, and	)	No. 09-cv-686-BLW
WESTERN WATERSHEDS PROJECT	)	
	)	DECLARATION OF
Original Plaintiffs,	)	FORREST MCCARTHY
	)	
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.	)	

I, Forrest G McCarthy, declare:

1. I am the Public Lands Director for Winter Wildlands Alliance. 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.

2. Aside from my professional capacity with WWA, I spend a great deal of time backcountry skiing, river running, camping, hunting, viewing wildlife and otherwise recreating and enjoying wilderness and public lands. Large wilderness areas, including The Frank Church Wilderness, are of the highest personal value to me.

3. I, other WWA members, and my adventure companions 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-River of No Return Wilderness is the epitome of what I seek when exploring wilderness. When traveling in designated Wilderness Areas, it is my expectation that the Forest Service will manage them in accordance with the 1964 Wilderness Act; and that I will be ensured a quiet non-motorized experience. The existence of helicopters violates the very wilderness values that the Frank Church Wilderness was set aside to protect.

5. I and several friends are planning on taking a ski and rafting traverse of the Frank Church Wilderness beginning on or around March 7, 2010, for the specific purpose of going to locations along the Middle Fork Salmon River where wildlife and wolves are congregating. We expect this trip to take about a week.

6. The non-mechanized wilderness quality of this region is a major attraction for us. We will traverse the Frank Church wilderness self-supported. One of the primary reasons we have chosen this area is its lack of mechanized and motorized vehicles, and the opportunity to view a lot of wildlife – including wolves – in the quiet wilderness setting.

7. Because the Middle Fork is an area with elk and wolf populations present, I believe it is likely 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 and landing in the Wilderness would disrupt and destroy the solitude and other wilderness values that we are looking to experience on our trip. The helicopter's hovering and landing will also scare and disturb wolves and other wildlife populations, and again destroy my aesthetic and recreational enjoyment of the Wilderness Area.

8. 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 2nd day of February, 2010, in Boise, Idaho.

/s/
FORREST G MCCARTHY