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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
KEN HELMS**

DECLARATION OF KEN HELMS

I, Ken Helms, declare:

1. My name is Ken Helms, and I reside in Boise, Idaho. I have been a resident of Boise since 1994.
2. My wife and I moved here primarily to enjoy the wilderness opportunities presented in this wonderful state. We both enjoy whitewater boating, hiking, backpacking, back-country skiing, mountain biking, camping (including winter camping), and other outdoor activities.
3. We visit the Frank Church-River of No Return Wilderness at least once a year, and usually more often than that. We boat the Middle Fork and Main Salmon Rivers in the Wilderness; and we hike and backpack in the Wilderness. For example, in fall 2009, we hiked in the headwaters of the Middle Fork Salmon, hoping to see wolves.
4. In all the many weeks we have spent in the backcountry, we actively look for wolves, but so far we have only seen one wolf, which was in the Big Horn Crag area of the Frank Church Wilderness. We are eager to see wolves in the backcountry, which is their home. Wolves are a natural part of the ecosystem, and for the health of many other species – including elk and bear – you need to have wolves present.
5. I am very excited about the trip I am planning to take this February into the Frank Church Wilderness to look for wolves in the winter setting. I will be flying into Bernard Creek airstrip with a friend or two, in the period February 24-26 (or 27), 2010. We plan to scout for elk concentrations as we fly into the airstrip, and then establish a base camp nearby so that can observe and photograph elk and wolves that we expect will be there too.
6. I am a very experienced backcountry skier and winter camper, and I derive deep satisfaction from the quiet and solitude of the winter landscape. Being able to observe and photograph elk and other wildlife in the winter requires the solitude and quiet that you would expect to find in the winter, and that I respect when I camp and hike or ski in winter conditions.
7. The intrusion of any motorized equipment degrades the quiet and solitude and scares away wildlife; and this is particularly true for helicopters that may be hovering very low or landing on the ground. I know this from having experienced low-flying aircraft in wilderness areas in Colorado, California, and Idaho in the past. I have been buzzed by low-flying aircraft, which did not even land in the wilderness but the noise and intrusion was very disruptive.

8. I understand that the Forest Service is allowing the Idaho Department of Fish and Game to take helicopters into the Frank Church Wilderness during the same time as I will be there, so that IDFG helicopters can fly low and hover just above the ground to pursue and shoot at wolves, and then land in the wilderness to collar and study wolves.
9. In my opinion this is totally against the Wilderness Act and violates the values of quiet, solitude and natural setting that the Wilderness Act protects – values which are very important to me, and which I am traveling into the Frank Church Wilderness this winter to experience and enjoy.
10. Because I will be going to areas where wolves and elk are expected to congregate, which is where the IDFG helicopter operations will also occur, I am very concerned that my wilderness experience and my ability to enjoy watching and photographing wolves and other wildlife in the Frank Church Wilderness will be irreparably damaged.
11. I don't understand why the IDFG feels the need to use helicopters to collar wolves, when the Nez Perce Tribe in all the years of their management did not need to use helicopters to monitor wolf populations.
12. I have been a long-time supporter of the Sierra Club, Western Watersheds Project, and Idaho Conservation League, as well as other environmental groups.
13. Because the Forest Service has approved helicopter low level flights and landings in the Frank Church Wilderness, I feel I will be directly harmed by this action unless the Court issues an injunction to stop it.

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct. Executed this 30th day of January, 2010, at Boise, Idaho.

/s/ Ken Helms
Ken Helms