

Lauren M. Rule (ISB # 6863)
 ADVOCATES FOR THE WEST
 PO Box 1612
 Boise ID 83701
 (208) 342-7024
 (208) 342-8286 (fax)
lrule@advocateswest.org

Laurence (“Laird”) J. Lucas (ISB # 4733)
 PO Box 1342
 Boise ID 83701
 208-424-1466 (phone and fax)
llucas@lairdlucas.org

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
 VERONICA EGAN**

I, Veronica Egan, declare:

1. My name is Veronica Egan, also known as Ronni Egan. I am Executive Director of Great Old Broads for Wilderness, a national, not-for-profit public lands organization that uses the activism, passion and wisdom of elders to protect wilderness and roadless wild lands. Our principle objective is the protection of healthy, intact wild ecosystems, as a proper legacy for our descendants and for the planet as a whole.

2. I have been a guide, outfitter, and outdoor educator in wilderness areas for over forty years, mainly in the southwestern United States. I treasure every moment that I spend in wilderness, hiking, horseback riding, river rafting, watching and studying wildlife, and enjoying the peace and solitude. I especially enjoy the bio-diversity that wilderness harbors, believing that everything from the lowliest invertebrates to the top predators are necessary for an ecosystem to function properly.

3. I have rafted the Middle Fork of the Salmon River in the Frank Church-River of No Return Wilderness, on several occasions, and have truly enjoyed the abundant wildlife found therein. I am planning to travel there in late February of 2010 to observe wildlife, and look forward to doing so in winter, a new experience for me. I will be traveling with Ginger Harmon and Marcy Olajos, who are both members of Great Old Broads for Wilderness.

4. It has come to my attention that the Idaho Department of Fish and Game plans to land helicopters in the FCRONRW to dart and radio-collar wolves for the purpose of "managing" them. My understanding of the Wilderness Act is that the landing of helicopters in Wilderness Areas is prohibited except in emergency situations or when it is the minimum tool necessary for the administration of wilderness. Furthermore, I feel that wolves, like all other denizens of wilderness, should be allowed to remain

“untrammeled” by human devices and management. If this activity occurs during my visit, and particularly if it interrupts my wildlife observation opportunities, it will have an extremely negative impact on my experience.

5. The Forest Service, in issuing a permit to IDFG for this purpose, failed to open a public comment period as required by NEPA. Many of the 4000 members of Great Old Broads for Wilderness often comment on proposed land management actions, after being alerted by our communications to them. I feel that this is one of our most important means of influencing management decisions, and the lack of a public comment period denied me, and our membership, that opportunity. Both I and our other members are harmed by that violation of NEPA.

6. It is my sincerest hope that before my visit, the Forest Service will be enjoined from permitting a plan for helicopter operations in the FCRONFW.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed the 20th day of January, 2010.

A handwritten signature in black ink, reading "Veronica Egan". The signature is written in a cursive, flowing style with a long horizontal flourish extending to the right.