

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

RALPH MAUGHAN, DEFENDERS
OF WILDLIFE, WESTERN
WATERSHEDS PROJECT,
WILDERNESS WATCH, and
CENTER FOR BIOLOGICAL
DIVERSITY,

Plaintiffs-Appellants,

v.

TOM VILSACK, U.S. Secretary of
Agriculture; TOM TIDWELL, Chief,
U.S. Forest Service; NORA RASURE,
Regional Forester of Region Four of the
U.S. Forest Service; KEITH LANNOM,
Payette National Forest Supervisor; and
VIRGIL MOORE, Director, Idaho
Department of Fish and Game,

Defendants-Appellees.

No. 14-35043

D.C. No. 4:14-cv-00007-EJL
District of Idaho, Pocatello

DECLARATION OF JEFF GOULD

I, Jeff Gould, declare as follows:

1. I am Chief of the Wildlife Bureau of the Idaho Department of Fish and Game.

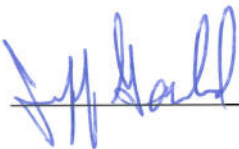
In this capacity, I have supervisory responsibility for the action being conducted by the Department to reduce the wolf population in the Middle Fork Management Zone (within the Frank Church River of No Return Wilderness) to address the impacts of wolf predation in support of the recovery of the Middle Fork elk population.

2. This action began in December 2013 and has consisted of a single Department employee conducting trapping and hunting activities on foot and with the aid of stock. The most recent take of a wolf was on January 13, 2014.
3. As of today, the Department has directed its employee to halt the Department's wolf control action in the Middle Fork Salmon River area.
4. The Department is proceeding promptly to gather up trapping equipment and transport the employee out of the area. It may take a few days for the Department to complete the gathering up of trapping equipment. The Department employee will vacate the Cabin Creek cabin today and will stay in state or private facilities for the final few days of the operation. The Department expects its operations in the area to be complete by the end of this week.

5. To date, the Department employee has removed nine wolves. As the Department removes trapping equipment, it is possible that the Department will find a small number of additional wolves have been taken.
6. The Department will not conduct any agency control action to lethally remove wolves from the Middle Fork area during the remainder of this state fiscal year (i.e., through June 30, 2014).

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 27 day of January, 2014



Jeff Gould