

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

RALPH MAUGHN, <i>et al.</i> ,)	Case No. 4:14-CV-0007-EJL
)	
Plaintiffs,)	
)	
v.)	
)	
TOM VILSACK, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

THIRD DECLARATION OF KEITH LANNOM

I, Keith Lannom, in accordance with the requirements of 28 U.S.C. § 1746, declare:

1. I am employed by the Forest Service, United States Department of Agriculture. I am the Forest Supervisor for the Payette National Forest. I have held this position since July 3, 2011. I have worked for the Forest Service since June, 1992.
2. I have a Bachelors of Science degree and Master of Science degree, both in Forestry, from Mississippi State University.
3. As the Forest Supervisor, I am responsible for the administration of the Payette National Forest, including regulation of the occupancy and use of National Forest System land within the boundaries of the Payette National Forest, and supervision of Forest Service employees assigned to the Payette National Forest.
4. I am familiar with the subject of this lawsuit based on my own personal knowledge and information provided to me in the course of my official duties.

5. As indicated in my First Declaration, the Forest Service first learned of specific plans by the Idaho Department of Fish & Game (IDFG) to hunt and trap wolves in the Middle Fork Zone, within the Frank Church River of No Return Wilderness and the Payette National Forest, in December of 2013, when the Forest Service was contacted by IDFG about the use of a Forest Service cabin for the State trapper.
6. IDFG ceased its hunting and trapping activities in January 2014.
7. Since then, the Forest Service has contacted and met with IDFG on several occasions to discuss IDFG's predation and elk management plans in the Middle Fork Zone, in accordance with the provisions of Federal regulations at 36 CFR § 241 Subpart A. These regulations call for the Forest Service to work cooperatively with State Fish and Game Departments to formulate plans for securing and maintaining desirable populations of wildlife species on the National Forests, and the planned and orderly removal of wildlife from National Forest System land. Most recently, the Regional Forester, Regional Wildlife Staff, and I met with the Director of IDFG on July 15, 2014 to discuss the State's predation and elk management plans.
8. On July 18, 2014, I learned that IDFG determined that it will not conduct any agency control actions for wolves within the Frank Church River of No Return Wilderness before November 1, 2015.
9. Over the next year, the Forest Service will continue to work cooperatively with IDFG by holding regular meetings with IDFG regarding its predation and elk management plans for the Middle Fork Zone, and regarding any specific plans or proposals by IDFG to conduct agency control actions within the Frank Church River of No Return Wilderness.

10. In addition to meeting with IDFG, the Forest Service will work cooperatively with IDFG on IDFG's plans to gather additional information on elk mortality and the effects of wolf control activities in the Middle Fork Zone.
11. I have been informed that IDFG will provide notice to the Forest Service by August 1, 2015, through the cooperative process, of any wolf control actions that it intends to conduct in the Frank Church River of No Return Wilderness during the winter of 2015-2016.
12. The Forest Service will provide written notice to plaintiffs by August 5, 2015, which includes the following information: a description of any wolf control actions that IDFG has informed the Forest Service it plans to undertake within the Frank Church River of No Return Wilderness during the winter of 2015-2016; and a final determination by the Forest Service as to whether it concurs with or objects to such plans.

Executed this 23rd day of July, 2014 in McCall, Idaho.


KEITH LANNOM
Forest Supervisor
Payette National Forest