

**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.

Appeal No. 14-35043

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

DECLARATION OF JEFF GOULD

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I, Jeff Gould, declare as follows:

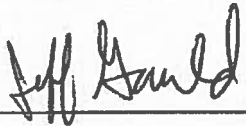
1. I am Chief of the Wildlife Bureau of the Idaho Department of Fish and Game (IDFG). I am a Certified Wildlife Biologist with an M.S. in Wildlife Ecology and Management.
2. In my capacity as Bureau Chief, I have supervisory responsibility for IDFG's actions to reduce the number of wolves in the Middle Fork Salmon River Elk Management Zone to address the impacts of predation from the reintroduced wolf population in support of the recovery of area elk herds. The Middle Fork Zone encompasses part of the Frank Church River of No Return Wilderness (Frank Church Wilderness).
3. Under a 2010 Memorandum of Agreement between IDFG and the U.S. Forest Service (USFS), IDFG coordinates and provides information and assessments to USFS regarding IDFG's wildlife management objectives, plans, projects, programs and policies on USFS-managed lands.
4. To improve coordination on IDFG's wolf management activities in the Frank Church Wilderness, IDFG managers, including myself, met in person with USFS managers in April and July, 2014. Over the next 12 months, IDFG and USFS will have additional meetings regarding our respective wildlife and habitat management authorities in wilderness, as well as elsewhere on national forest lands.

5. IDFG has determined it is in a better position to defend Idaho's sovereign wildlife management authorities by improving USFS' understanding as to how IDFG applies wilderness considerations in exercising state authorities, and how IDFG's actions to reduce the wolf population for the near term appropriately mitigate the negative effects to wildlife from wolf reintroduction into the wilderness.
6. The human intervention of wolf reintroduction had negative effects greater than the federal government anticipated to area elk herds, whose value to the Frank Church Wilderness was a significant factor in IDFG's and others' support for its wilderness designation.
7. Over the next year, IDFG will continue to gather information to inform its wolf management decisions. IDFG has recently expanded DNA sampling of wolf scat in key areas statewide, including the Middle Fork Zone. IDFG will continue to monitor the effects of wolf control activities conducted in the Middle Fork last winter and in other areas in Idaho for the benefit of elk and other ungulates. IDFG will also continue research regarding elk mortality.
8. IDFG has determined it will not conduct any agency control actions for wolves within the Frank Church River of No Return Wilderness before November 1, 2015.

9. As part of the coordination under our MOU with USFS, IDFG will provide courtesy notice to USFS by August 1, 2015 of any wolf control actions that IDFG may conduct in the Frank Church Wilderness in the winter of 2015-2016.
10. Recreational license activities for the take of wildlife will continue in the 2014-2015 period in the Frank Church Wilderness under Idaho Fish and Game Commission seasons and rules.

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

DATED this 18th day of July, 2014.



Jeff Gould