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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

DEFENDERS OF WILDLIFE, NATURAL)
RESOURCES DEFENSE COUNCIL,)
SIERRA CLUB, HUMANE SOCIETY OF)
THE UNITED STATES, CENTER FOR)
BIOLOGICAL DIVERSITY, JACKSON)
HOLE CONSERVATION ALLIANCE,)
FRIENDS OF THE CLEARWATER,)
ALLIANCE FOR THE WILD ROCKIES,)
OREGON WILD, CASCADIA WILDLANDS)
PROJECT, WESTERN WATERSHED)
PROJECT, and WILDLANDS PROJECT,)

Plaintiffs,

vs.

H. DALE HALL, U.S. Fish and Wildlife)
Service Director; DIRK KEMPTHORNE,)
Secretary of the Interior; and UNITED)
STATES FISH AND WILDLIFE SERVICE,)

Defendants.

Case No. CV-08-56-M-DWM

**DECLARATION OF FRANZ
CAMENZIND**

I, Dr. Franz Camenzind, declare as follows:

1. I am a resident of Jackson, Wyoming and the Executive Director of the Jackson Hole Conservation Alliance. I am also a member of the Jackson Hole Conservation Alliance. The Jackson Hole Conservation Alliance consists of 1,800 members from all across the country who share a desire to see that human activities in the Jackson area are in harmony with the area's irreplaceable wildlife resources. The Jackson Hole Conservation Alliance and I have advocated for, and worked to promote legitimate wolf recovery in Wyoming and the Yellowstone ecosystem. I have been the executive director for the past eleven years and before that was a member of the board of directors for 13 years.
2. I have lived in Jackson Hole since 1970. My professional training is in wildlife biology, specializing in the study of canids, or the dog family, which includes coyotes and wolves. I came to Jackson Hole as a graduate student studying coyote behavior primarily on the National Elk Refuge. I received my B.S. in Biology from the University of Wisconsin in 1966, an M.S. in Zoology from Brigham Young University in 1968, and a Ph.D. in Zoology from the University of Wyoming in 1978.
3. I have studied and observed wolves and coyotes for more than thirty years. I have observed wild wolves in the Canadian Provinces of The Northwest Territory, Alberta and British Columbia, and the states of Alaska, Montana, Wyoming and

Minnesota. I have made a one-hour film that aired on network television in 1989. The film presented information and images on gray wolves, Mexican wolves and the red wolf. While I am not currently employed as a wildlife biologist, I continue to study wolf biology in my free time. I often attend public presentations by wolf managers and researchers, and conferences such as the North American Wolf Conference so that I can continue to keep abreast of scientific developments. I regularly read the Rocky Mountain Wolf Management Annual Reports, Yellowstone Wolf Project reports and new scientific articles as soon as they appear. I read and maintain a personal library containing thousands of articles and dozens of books on wolves from Wyoming and all around the world. I regularly visit Grand Teton and Yellowstone National Parks in order to view wolves. Attached as Exhibit A is a picture of a wolf in the Teton Pack that I took in October of 2006, in Grand Teton National Park. This was one of four wolves that I saw while hiking. She was inquisitive as she circled and approached me to within 75 yards. I was able to take several pictures before she wandered off to join her pack members. I never felt threatened or in harm's way, in fact I was exhilarated to have such an open encounter. Whenever possible, I continue to go into the field to search for wolves and signs of their activity in western Wyoming.

4. I follow closely the reports of the six Grand Teton Park and Jackson Hole wolf packs, which reside near my hometown, Jackson, Wyoming. In every season of

the year, I visit the public lands around Jackson in search of wolves, and will continue to do so in the future. Specifically, I have seen the Teton wolf pack on numerous occasions over the past ten years. I fear that the Teton Pack, or members of the Teton Pack, will be killed under Wyoming state management, because part of the home range of Teton Pack includes Wyoming's state-operated winter elk feeding grounds. If wolves visit these feeding grounds and are deemed to be causing "unacceptable" wolf-elk interactions, Wyoming State Legislation and the State Management Plan call for the wolves to be "aggressively managed." I also fear for the lives of two Jackson Hole wolf packs whose home ranges extend into the State's predator zone, where after delisting, wolves can be killed by anyone, anytime and without restriction. The predator zone is adjacent to the southwestern boundary of the incorporated limits of the Town of Jackson, Wyoming and six miles from the southern boundary of Grand Teton National Park. Searching for, seeing tracks and scat, and viewing the Jackson Hole wolves and specifically the Teton Pack is an important part of my life. It would be a big loss for me if any Jackson Hole wolves and specifically, members of the Teton Pack were harmed merely because they ventured into the Wyoming predator zone.

5. Immediately after delisting, Wolf 253M, a male wolf originally from the Druid Pack in the Lamar Valley in Yellowstone Park was killed in the Wyoming predator zone. As far as I know, Wolf 253M had never caused any trouble, it was simply a

victim of Wyoming state management. Wolf 253M had an interesting life story. I had first seen Wolf 253M in Yellowstone Park. It was a large black wolf with a discernable limp. Wolf 253M was born in Yellowstone Park in 2000, as a sub-adult traveled to Utah, about twenty miles from Salt Lake City, where it was caught in a coyote trap. It was then trucked to the southern boundary of Yellowstone National Park. From there, it traveled back to the Lamar Valley in Yellowstone Park where it rejoined the Druid Pack. Two years later, it traveled south to the National Elk Refuge outside Jackson, Wyoming and formed what became known as the Flat Creek Pack. For the next year, I made many trips to the Elk Refuge in search of 253M and his pack of three adults and five pups. On numerous occasions I experienced the joy of observing 253M and his pack members on the Elk Refuge, traveling, resting and occasionally chasing elk and antelope. Sometime later, 253M left the valley and was not heard from again until it was one of the first wolves reported killed in Wyoming in Sublette County on March 28, 2008 in the State's newly designated predator zone. I was injured by the killing of Wolf 253M, because I will never be able to see this well-known wolf again. I also regularly look for wolves in Sublette County, Wyoming, and will continue to do so in the future. My prospects for seeing wolves in Sublette County have been seriously reduced by wolf delisting, Wyoming state management, the Wyoming predator status and the resulting killing of wolves.

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

Executed on April 23, 2008, in Jackson, Wyoming.



Dr. Franz Camenzind

