

# EXHIBIT 1

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION

RUSSELL COUNTRY SPORTSMEN, )  
MONTANA TRAIL VEHICLE RIDERS ) No. 4:08-cv-64-SEH  
ASSOCIATION, GREAT FALLS )  
TRAIL BIKE RIDERS ASSOCIATION, ) Judge Sam E. Haddon  
MEAGHER COUNTY LITTLE BELTERS, )  
GREAT FALLS SNOWMOBILE CLUB, ) FEDERAL DEFENDANTS'  
TREASURE STATE ALLIANCE, ) DECLARATION OF LESLEY  
MOTORCYCLE INDUSTRY COUNCIL, ) W. THOMPSON  
(more parties on next page) )

SPECIALTY VEHICLE INSTITUTE )  
 OF AMERICA; AND THE )  
 BLUERIBBON COALITION, )  
 )  
 Plaintiffs, )  
 )  
 THE UNITED STATES FOREST )  
 SERVICE, )  
 THE LEWIS AND CLARK NATIONAL )  
 FOREST, AND )  
 LESLEY W. THOMPSON, )  
 Forest Supervisor, )  
 )  
 Defendants, )  
 )  
 MONTANA WILDERNESS )  
 ASSOCIATION, )  
 )  
 Defendant-Intervenor. )  
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I, LESLEY W. THOMPSON, declare:

1. I am employed by the United States Department of Agriculture, U.S. Forest Service, as the Forest Supervisor for the Lewis and Clark National Forest. As Forest Supervisor I am responsible for overall management and administration of the Lewis and Clark National Forest, including the implementation of the 2007 Travel Management Plan that is at issue in this litigation.
2. The Forest Service’s proposed remedy would result in less sediment reaching stream channels, improved elk security, improved westslope cutthroat

trout habitat, more loop opportunities for motorized users, more opportunities for unlicensed drivers and unlicensed vehicles to use Forest Service roads, a slight increase in opportunities for solitude in summer, and it will leave in place the winter decision which is based on an agreement between the Montana Snowmobile Association (MSA), Montana Wilderness Association (MWA), and the Forest Service.

3. Compared to the 1988 Travel Plan as amended (the 1988 Travel Plan), the proposed remedy would reduce numerous stream crossings that contribute greatly to sediment reaching streams and permits the continued obliteration of unneeded roads which also contribute to massive amounts of sediment reaching streams.

4. The proposed remedy's seasonal restrictions on many of the roads beyond the 1988 Travel Plan would increase elk security in areas where elk are vulnerable during spring calving and during hunting season.

5. In some areas, the proposed remedy would allow the Forest Service to restore westslope cutthroat trout. Westslope cutthroat trout are a species of concern and currently occupy less than 5 % of their historic habitat.

6. Compared to the 1988 Travel Plan, the proposed remedy would allow the Forest Service to continue to construct loop opportunities for motorized users that did not exist in the 1988 Travel Plan. It also allows the Forest Service to continue

to designate mixed use roads for unlicensed drivers between the ages of 12 and 16 to drive on roads that they would be excluded from if the 1988 Travel Plan were to remain in place.

7. Since 2007, the Forest Service has been rehabilitating trails or otherwise correcting resource problems as the 2007 Travel Plan allowed. That work is continuing, and the Forest Service has scheduled future work to rehabilitate trails and to address resource issues.

8. The proposed remedy would leave in place the motorized restrictions in Hoover Creek and Pilgrim Creek areas, which provide the opportunity for solitude near Great Falls. The Forest Service based the timing of use of the designated routes in the Pilgrim Creek area on an agreement between motorized users and non-motorized users.

9. The proposed remedy would also leaves in place the decision for winter recreational use, which is based on an agreement between MSA, the MWA, and the Forest Service. This is a historic agreement reached between groups that are frequently at odds with each others' goals, and leaving this plan in place encourages the groups to continue to cooperate to find mutually acceptable solutions to recreational travel.

10. The Forest Service removed the King Creek Trail in the Judith Wilderness

Study Area (Judith WSA) soon after it began implementing the 2007 Travel Plan. The trail designated for motorized use crossed King Creek twenty-one times. Most ford approaches were composed of fine textured soils and continually routed fine material to King Creek either through fording of vehicles or during intense rain events. That disrupted the creek's function and increased the sediment reaching the creek. The sediment was impairing westslope cutthroat trout rearing habitat and habitat of other aquatic organisms.

11. Pursuant to the provisions of 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

June 18, 2010

  
LESLEY W. THOMPSON  
Forest Supervisor