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**Pro Hac Vice* Pending

Attorneys for Applicant Defendant-Intervenors

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

CENTER FOR BIOLOGICAL DIVERSITY,) No. 3:17-cv-00091-JWS
)
Plaintiff,)
)
v.)

| | | |
|---|---|----------------------------|
| RYAN ZINKE, et al., |) | DECLARATION OF |
| |) | ROD ARNO IN SUPPORT |
| |) | OF ALASKA OUTDOOR |
| Defendants. |) | COUNCIL’S MOTION TO |
| |) | INTERVENE |
| PACIFIC LEGAL FOUNDATION; |) | |
| ALASKA OUTDOOR COUNCIL; |) | |
| BIG GAME FOREVER; KURT |) | |
| WHITEHEAD; and JOE LETARTE, |) | |
| |) | |
| Applicant Defendant-Intervenors. |) | |
| <hr style="width: 40%; margin-left: 0;"/> |) | |

I, ROD ARNO, declare that:

1. I submit this Declaration in support of Alaska Outdoor Council’s Motion to Intervene in the case, *Center for Biological Diversity v. Zinke*, U.S.D.C., D. Alaska No. 3:17-cv-00091JWS (Lawsuit).

2. I have personal knowledge of the facts stated in this Declaration, and if called as a witness, I could and would testify to these facts under oath.

3. I serve as the Executive Director of Alaska Outdoor Council, which is a non-profit corporation, formed in 1955 and headquartered in Anchorage, Alaska.

4. Alaska Outdoor Council has long been dedicated to the preservation of outdoor pursuits in Alaska—hunting, fishing, trapping, and public access—and conservation of the habitats upon which they depend.

5. Alaska Outdoor Council works to unite the voices of its more than 10,000 members and 47 member clubs to effectively represent their outdoor interests in all facets of public policy.

6. Our members include fishers, mountaineers, hunters, boaters, hikers, trappers, campers, and photographers.

7. On behalf of our members and member clubs, and based on their extensive input, Alaska Outdoor Council is committed to, among other things, (a) maintaining Alaska’s fish and wildlife resources and their habitats, (b) protecting the hunting and fishing rights of our members and the general public,

(c) assuring equal access to and common use of public lands and resources, (d) preserving critical wildlife habitat, (e) supporting professional state management of Alaska’s fish, wildlife, and habitats, (f) continuing education on renewable resource management, (g) participating in legislative, regulatory, administrative, and judicial decisions that affect Alaska’s natural resources and their use.

8. Both Alaska Outdoor Council and I, as its Executive Director, stay up to date on state and federal environmental laws, rules, and regulations. I am familiar with the “Non-Subsistence Take of Wildlife, and Public Participation and Closure Procedures, on National Wildlife Refuges in Alaska” (Refuges Rule). 81 Fed. Reg. 52,248 (Aug. 5, 2016). I understand that this Refuges Rule was withdrawn pursuant to Public Law No. 115–20. I further understand that through this Lawsuit, Plaintiff Center for Biological Diversity seeks to reinstate the Refuges Rule.

9. Alaska Outdoor Council and I are well aware of the Refuges Rule and the impact that its reinstatement would have on our members and member clubs. Indeed, Alaska Outdoor Council represented its members and member clubs throughout the administrative process after the initial draft of what eventually became the Refuges Rule was proposed and considered.

10. Alaska Outdoor Council and its members and member clubs therefore have a direct interest in this Lawsuit. Alaska Outdoor Council’s members’ access to and use of National Wildlife Refuges in Alaska will be severely restricted if the Refuges Rule is reinstated. Further, this Lawsuit relates directly to Alaska Outdoor Council’s mission—to preserve outdoor pursuits in Alaska, hunting, fishing, trapping, and public access, and to conserve the habitats upon which they depend.

11. Additionally, if Alaska Outdoor Council is not permitted to intervene in this Lawsuit, it will be compelled to divert resources toward legislative, legal, and administrative efforts to protect its interests and the interests of its members and member clubs, namely their access to and use of the National Wildlife Refuges in

Alaska. These resources would otherwise be used for conservation and related efforts elsewhere.

* * *

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed in Wasilla, Alaska on May 3, 2017.

s/ Rod Arno (consent)
ROD ARNO
Executive Director – Alaska Outdoor Council