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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.,                       | ) | <b>DECLARATION OF RYAN</b>  |
|   | ) | <b>BENSON IN SUPPORT OF</b> |
|   | ) | <b>BIG GAME FOREVER'S</b>   |
| Defendants.                               | ) | <b>MOTION TO INTERVENE</b>  |
|   | ) |                             |
| 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, RYAN BENSON, declare that:

1. I submit this Declaration in support of Big Game Forever's Motion to Intervene in the above-captioned case (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 have an undergraduate degree in Political Science, with a minor in Zoology. I also graduated from Harvard Law School.

4. I have been a lifetime outdoorsman, involved in conservation, hunting, fishing, and education.

5. I am the Founder and President of Big Game Forever, which was established to counter threats to wildlife and sportsmen's rights. Its mission is to unite sportsmen to address the most serious threats to wildlife, hunter's rights, and America's outdoor heritage.

6. Big Game Forever is a non-profit corporation in Bountiful, Utah. It has approximately 65,000 members.

7. Big Game Forever carries out its mission through three principles: Protect what we have, Restore what we have lost, and Ensure abundant wildlife for future generations.

8. By “Protect,” Big Game Forever engages in legislative and legal strategies to tackle the most complex and challenging issues threatening abundant wildlife populations and the North American Model of user-based conservation through hunting, trapping, and angling. Big Game Forever engages with state and local governments to protect diverse wildlife populations. It also participates in strategic litigation to further these interests.

9. Further, Big Game Forever seeks to “Restore” healthy populations of wildlife so that various species can thrive in modern environments.

10. Finally, Big Game Forever “Inspires” its members by assisting their related efforts in wildlife conservation.

11. Big Game Forever and its members are active across the country, including in Alaska.

12. Both Big Game Forever, and I as its President, 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.

13. Big Game Forever's participation in this Lawsuit is directly related to its mission to address the most serious threats to wildlife, hunter's rights, and America's outdoor heritage. The reinstatement of the Refuges Rule would severely restrict Big Game Forever's members from hunting and trapping on National Wildlife Refuges in Alaska. It would also harm Big Game Forever's efforts to conserve and promote diverse wildlife in these refuges by ensuring balance of predator and prey populations. Big Game Forever believes that due to its interests in hunting and America's outdoor heritage, it is particularly qualified and motivated to protect wildlife in the modern environment. Reinstatement of the Refuges Rule will impede Big Game Forever's efforts.

14. Additionally, if Big Game Forever is not permitted to intervene in this Lawsuit, it will be compelled to divert resources toward legislative, legal, and administrative efforts to protect Big Game Forever and its members' access to National Wildlife Refuges in Alaska. These resources would otherwise be used for conservation and other 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 Bountiful, Utah, on May 2, 2017.

s/ Ryan Benson (consent)  
RYAN BENSON