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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, e	et al.,
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Defendants.

)

)

PACIFIC LEGAL FOUNDATION; ALASKA OUTDOOR COUNCIL; BIG GAME FOREVER; KURT WHITEHEAD; and JOE LETARTE,

Applicant Defendant-Intervenors.

DECLARATION OF KURT WHITEHEAD IN SUPPORT OF PACIFIC LEGAL FOUNDATION, ET AL.'S MOTION TO INTERVENE

I, KURT WHITEHEAD, declare that:

1. I submit this Declaration in support of the Motion to Intervene in the case, *Center for Biological Diversity v. Zinke*, U.S.D.C., Dist. of 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 am a licensed Alaska Master Guide/Outfitter (#211) and an Alaskan Fishing Guide.

4. I am a member of the Alaska Professional Hunters Association, Safari Club International, and the Boone & Crockett Club.

5. My wife and I own and operate Treasure Hunter Lodge, LLC in Klawock, Alaska, where we offer fully-guided, lodge, or boat-based fishing and hunting trips.

6. As a full-time guide, I have guided big-game hunters in Alaska every spring and fall since 1996. I plan to continue doing so in the future.

7. I have guided hunters in the Yukon Delta National Wildlife Refuge and plan to continue these guided hunts there in the future.

8. I have guided hunters in the Aniachak National Preserve since 2011 and plan to continue these guided hunts there in the future.

9. As a licensed Alaska Master Guide/Outfitter, and based on my experience in hunting in Alaska, I have observed that wolves and bears are voracious predators, and if left unmanaged, they will eliminate the ungulate populations in Alaska.

10. As a professional hunter-guide, I have a direct interest in controlling the predator population in Alaska and in conserving the diverse wildlife populations and their habitats.

11. As part of my full-time profession, I 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.

12. I am well aware of the Refuges Rule and the impact that its reinstatement would have on my profession and on Alaska's wildlife population and habitats. Reinstatement of the Refuges Rule would prevent me from helping to manage the predator population in the National Wildlife Refuges in Alaska.

13. I have direct interest in this Lawsuit. My access to and use of National Wildlife Refuges in Alaska will be severely restricted if the Refuges Rule is reinstated.

* * *

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

Executed in Klawock, Alaska on May 3, 2017

<u>s/ Kurt Whitehead (consent)</u> KURT WHITEHEAD