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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

CENTER FOR BIOLOGICAL DIVERSITY,)
)
Plaintiff,)
)
v.)
)
RYAN ZINKE, in his official capacity as)
Secretary of the Interior; and U.S.)
DEPARTMENT OF THE INTERIOR,)
)
Defendants,)
)
STATE OF ALASKA,)
)
Applicant Defendant-Intervenor.)

Case No. 3:17-cv-00091-JWS

DECLARATION OF BRUCE DALE

Pursuant to 28 U.S.C. § 1746, I, Bruce Dale, declare as follows:

1. I submit this declaration in support of State of Alaska’s Motion to Intervene as Defendant. If called as a witness, I have personal knowledge of the matters set forth below, and will competently testify on these matters if called upon to do so.

2. I hold a B.A. degree in scientific and technical communication from the Michigan Technological University and a M.S. degree in wildlife biology from the University of Alaska – Fairbanks.

3. I am the Director of the Division of Wildlife Conservation of the Alaska Department of Fish and Game (“ADF&G”). I have worked in this position since December 2014 as Acting Division Director and then appointed as the Director in July 2015. I have worked for ADF&G since 1995, initially serving as the Fairbanks Area Management Biologist and then as a Research Biologist. Over the last several years, I have accepted increasingly complex responsibilities, serving as Region IV Supervisor, Deputy Director, Acting Division Director, and now Director.

4. I am actively involved with the national Association of Fish and Wildlife Agencies and the Western Association of Fish and Wildlife Agencies. I participate regularly in AFWA and WAFWA committees that discuss, act, and comment on matters of state sovereignty in regards to wildlife management.

5. I am responsible for all matters involving the administration of wildlife management in the State of Alaska, including administration of hunting and trapping regulations adopted by the Alaska Board of Game. With the help of staff I coordinate the preparation, collection, organization, and/or policy oversight on comments regarding federal agency actions involving all federal land management planning and decisions that may affect wildlife in Alaska. I am also involved in various litigation efforts pertaining to wildlife in Alaska.

6. In my role as Director of the Division of Wildlife Conservation, I oversee Department research and monitoring activities on wildlife populations throughout Alaska. The Department manages Alaska’s wildlife, both predators and prey, under the principle of sustained yield as required by the Alaska Constitution. Alaska participates in the direct management of its wildlife resources. A key purpose of the Division is to maintain and enhance opportunities to hunt, trap, view, and conserve wildlife.

7. Based on my experience, training, and personal knowledge, I am familiar with statutes and regulations on Alaska's sovereign interest in managing wildlife, as well as Alaska's interests in habitat, land, and natural resource management. I am also familiar with Alaska's hunting, trapping, and subsistence regulations.

8. A potential judgment in Plaintiff's favor that may invalidate the Congressional Review Act ("CRA") or reinstate the (now revoked) U.S. Fish and Wildlife Service regulations, 81 Fed. Reg. 52,248 (August 5, 2016), could restrict methods and means for hunting on 80 million acres in Alaska and would directly and negatively impact wildlife management, hunting, and wildlife viewing in Alaska. The revoked rule, if reinstated, would restrict methods and means of hunting without a biological or conservation need.

9. A judgment in Defendant's favor would uphold the CRA and maintain the State's authority to manage wildlife and to regulate hunting on national wildlife refuges, except to the extent expressly limited by Congress.

10. Attached are true and correct letters from the Commissioner of ADF&G to our Representative Don Young and Senators Dan Sullivan and Lisa Murkowski, a letter from Dan Sullivan to Alaska Governor Bill Walker, and a press release issued by the Governor's office. Each of these reflect a concerted effort by the State, including ADF&G, to utilize the CRA to revoke the federal Refuge Rule.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on May ____, 2017 in Anchorage, Alaska.

Bruce Dale
Director
Division of Wildlife Conservation
Alaska Department of Fish and Game