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

CENTER FOR BIOLOGICAL DIVERSITY,	)	
	)	
Plaintiff,	)	Case No. 3:17-cv-00091-JWS
	)	
v.	)	
	)	
RYAN ZINKE, in his official capacity as	)	<b>DECLARATION HAZEL NELSON</b>
Secretary of the Interior; and U.S.	)	
DEPARTMENT OF THE INTERIOR,	)	
	)	
Defendants,	)	
	)	
STATE OF ALASKA,	)	
	)	
Applicant Defendant-Intervenor.	)	

Pursuant to 28 U.S.C. § 1746, I, Hazel Nelson, declare as follows:

1. I submit this declaration in support of the 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 am the Director of the Division of Subsistence of the Alaska Department of Fish and Game (“ADF&G”) and have worked in this position since April 2011. I previously worked for Becharof Corporation since 1987, including serving as President of the ANCSA corporation.

3. Over the years I have worked on State and Federal resource regulatory processes, including fish and wildlife management issues. I served in key positions throughout Alaska in regulatory, industry, and economic development organizations, such as the North Pacific Fisheries Management Council, Lake and Peninsula Borough, Bristol Bay Economic Development Corporation, U.S.-Russian Inter-Governmental Consultative Committee, and the South West Alaska Municipal Conference.

4. I was raised in a subsistence household. I have direct, hands-on experience and knowledge of a subsistence lifestyle. In my work experience as well as my personal experience, I have developed a deep understanding of, and commitment to, the importance of subsistence to many Alaskans.

5. I am responsible for all matters involving the customary and traditional uses of fish and wildlife in the State of Alaska, including conducting research, analyzing data, and compiling information to assist the Alaska Board of Game and Alaska Board of Fisheries. With the help of staff, I monitor federal agency actions, plans, and decisions that may affect subsistence uses of fish and wildlife in Alaska. I am also involved in various litigation efforts pertaining to fish and wildlife in Alaska.

6. In my role as Director of the Division of Subsistence, I oversee the preparation, collection, organization, and reporting on subsistence harvests and uses of fish and wildlife throughout Alaska. The Department manages Alaska's wildlife, both predators and prey, under the principle of sustained yield as required by the Alaska Constitution and with a preference for subsistence uses as required by statute.

7. Based on my experience, training, and personal knowledge, I am familiar with statutes and regulations on Alaska's interest in managing fish and wildlife for subsistence uses,

as well as Alaska's interests in habitat, land and natural resource management. I am also familiar with Alaska's fishing, 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 hunting on 80 million acres in Alaska and would directly and negatively impact wildlife management and subsistence uses of wildlife in Alaska. The revoked rule, if reinstated, would prevent many Alaskans from participating in subsistence harvests or from using customary and traditional methods of harvest.

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

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.

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Hazel Nelson  
Director  
Division of Subsistence  
Alaska Department of Fish and Game