

# Exhibit 1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO-OAKLAND DIVISION

<p>SIERRA CLUB and SOUTHERN BORDER COMMUNITIES COALITION,</p> <p><i>Plaintiffs,</i></p> <p>v.</p> <p>DONALD J. TRUMP, President of the United States, in his official Capacity; PATRICK M. SHANAHAN, Acting Secretary of Defense, in his official Capacity; KIRSTJEN M. NIELSEN, Secretary of Homeland Security, in her official Capacity; AND STEVEN MNUCHIN, Secretary of the Treasury, in his official Capacity,</p> <p><i>Defendants.</i></p>	<p>Case No.: 4:19-cv-00892-HSG</p> <p><b>Declaration of Gayle G.Hartmann</b></p>
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My name is Gayle G. Hartmann. The following is true and correct, based on my experience and my review of publicly available information.

1. I live in Tucson, Arizona, and have lived in Tucson for over 50 years.
2. I joined the Sierra Club in the 1970s, and am a Life Member. In the early 1980s I was the Co-chair and then Chair of the Rincon Group of the Sierra Club, which encompasses the city of Tucson and the surrounding

region including Organ Pipe Cactus National and a portion of the Cabeza Prieta National Wildlife Refuge. During that time, and since, I have been active in efforts to protect from development areas of biological and cultural importance in southern Arizona.

3. Over the years I have spent considerable time in southwestern Arizona including Organ Pipe Cactus National Monument, the Cabeza Prieta National Wildlife Refuge and the Barry M. Goldwater Range as well as the Pinacate volcanic region just south of the border (that region is now El Pinacate and Gran Desierto Biosphere Reserve [recently designated a UNESCO World Heritage Site] along with El Alto Golfo and Rio Colorado Delta Biosphere Reserve). I first visited the Arizona portion of the region in 1971 while working on a book with my husband, Bill Hartmann. The book, titled *Desert Heart: Chronicles of the Sonoran Desert*, published in 1989, focused on the Sonoran Desert of northwestern Sonora and southwestern Arizona. It described the natural history and social history of this unique and truly amazing region.

4. In the 1980s I was a member of a team of scientists working with the University of Arizona that produced the first natural and cultural resources management plan for what was then called Luke Air Force Range (now Barry M. Goldwater Range). At that time the Cabeza Prieta National Wildlife Refuge was considered a part of the Range and was included in our study.

5. More recently, in the late 1990s I spent three months working on an archaeological project at Tinajas Altas – the series of pools that provide one of the most important sources of water in the region. We each lived in individual tents, cooked on an outdoor stove, spent chilly evenings around a campfire (the project was conducted from January through early April), and gained an enormous appreciation for the prehistory and history of this region. One result of that project was a book published in 2012 entitled *Last Water on the Devil's Highway: A Cultural and Natural History of Tinajas Altas*, of which I was a co-author.

6. Over the course of those activities and work, and others, I have regularly visited and enjoyed the area in the vicinity of the proposed wall-construction projects labeled Tucson Sector 1 and 2, extending along the border near Lukeville, and I certainly expect to return in the near future.

7. A central element of my enjoyment of that area has been learning, understanding, and appreciating the wildlife and plants, as well as the human history of the region. The connected nature of its geography—both human and ecological—is particularly important to me. I am especially concerned about the impacts on wildlife of further fragmenting the cross-border habitat of species like pronghorn and bighorn. Such species rely on their access to lands on both sides of the border to survive; it is my understanding that it is well-nigh impossible for such animals to cross the

pedestrian fencing planned for Tucson Sectors 1 and 2, threatening that access, and likely reducing their numbers.

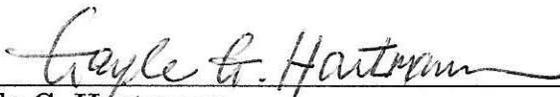
8. The construction of the proposed wall will also negatively affect my ability to enjoy the manner in which these lands retain the connectedness that allowed indigenous peoples to live and thrive in this arid, beautiful, and seemingly inhospitable place, by travelling back and forth from the Gila River to the Pinacate region and Gulf of California to the south.

9. The proposed wall segments will fundamentally alter my experience of these lands, by intruding upon the natural beauty, and historical connectedness of people and species, that I visit these areas to experience.

10. For these reasons, the proposed Tucson Sector 1 and 2 projects will, if they occur, injure me aesthetically, recreationally, morally and professionally. That harm would be prevented by an order preventing those projects' construction.

I hereby declare under penalty of perjury pursuant to the laws of the United States that the above is true and correct to the best of my knowledge.

Dated: May 26, 2019

  
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Gayle G. Hartmann