

Exhibit 4

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

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| <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>Declaration of Bill Broyles</p> |
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My name is Bill Broyles, and I declare:

1. I reside in Tucson, Arizona, north of the border between the United States and Mexico. I also own land near Ajo, Arizona, near the Organ Pipe Cactus National Monument and the Cabeza Prieta National Wildlife Refuge.
2. I have been a member of the Sierra Club since 1989.
3. I regularly spend time in the vicinity of the proposed Tucson Section Projects 1 (extending northwest and southeast from Lukeville, Arizona) and 2 (extending through Lukeville), and intend to continue to do so in the future. Those portions of the border are flanked by large federal reserves that protect wildlife, habitat, and which provide extraordinary opportunities for wilderness-based recreation. Those

areas include Organ Pipe Cactus National Monument, the Cabeza Prieta National Wildlife Refuge, and the Goldwater Range. Similar reserves lie along the Mexican side of the border: El Pinacate and Gran Desierto Biosphere Reserve (recently designated a UNESCO World Heritage Site) and El Alto Golfo and Rio Colorado Delta Biosphere Reserve.

4. For the past 50 years, I have hiked, camped, vacationed, and traveled through the above-described areas, studying and observing the region's human- and natural history. I have traversed thousands of miles, and spent hundreds of days and nights, in these areas. I continue to visit these areas four to six times a year.

5. As a volunteer with the Cabeza Prieta National Wildlife Refuge, I have worked several thousand hours counting desert bighorn, surveying desert waterholes, measuring rainfall, and removing trash from the Refuge

6. I have written and edited books and articles on the area, including: *Organ Pipe Cactus National Monument*, *Our Sonoran Desert*, *Dry Borders*, *Sunshot*, *Last Water on the Devil's Highway*, *Desert Duty: On the Line with the U.S. Border Patrol*, *Cowboys and Cowgirls Around Ajo Arizona*, and *Field Man*.

7. My study and travels through these borderlands are critically enhanced by the presence of a wide array of species—some of which are endangered—within them. Some of those species, such as Sonoran Pronghorn and Desert Bighorn, use and require habitat that spans the border and have historically moved throughout northwestern Sonoran and southwestern Arizona. I understand that the construction of walls that such species cannot cross harms such species, by

inhibiting their access to parts of their habitat, and increasing human disturbances in the area.

8. My enjoyment of these areas will also be damaged by the incessant lighting associated with the wall and its construction, which, I understand, will disrupt night flights of migrating birds, and mar my and others' view of the night skies—a central attraction of Organ Pipe Cactus National Monument and other public lands in the area.

9. The widening of roads necessary to enable construction of these wall segments, along with the noise and dust associated with construction, will disturb that natural quiet of the area for many months, displacing wildlife from areas near the wall, exacerbating soil erosion, and substantially diminishing my and others' pleasure in experiencing the area.

10. At a more fundamental level, the proposed barrier construction will blight a landscape whose core attractions include unimpeded views across the border (of, for example, the volcanic cones and peaks of Mexico's Pinacate Biosphere Reserve), solitude and quiet, and the shared heritage, history, and culture of our two bordering nations. The wall diminishes each of those basic values, thereby irrevocably altering my and others' experience of the borderlands.

11. I am concerned by the absence of any environmental review of these projects. Such review, and an opportunity for public comment, would allow the community (including me) to better inform the agencies' decision, and, at a minimum, would

permit the agencies to identify less intrusive means of pursuing their goals, or of mitigating the impacts of their actions.

12. For all of these reasons, the proposed wall construction will injure me professionally, aesthetically, recreationally, and morally. An order halting the wall's construction would remedy those injuries.

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 23, 2019



Bill Broyles