

Exhibit 5

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

<p>SIERRA CLUB and SOUTHERN BORDER COMMUNITIES COALITION,</p> <p style="text-align: center;"><i>Plaintiffs,</i></p> <p style="text-align: center;">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 style="text-align: center;"><i>Defendants.</i></p>	<p>Case No.: 4:19-cv-00892-HSG</p> <p>Declaration of Patricia Gerrodette</p>
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My name is Patricia Gerrodette, and I declare:

1. I am over 18 years old. The information in this declaration is based on my personal experience and my review of publicly available information. If called as a witness, I could and would testify competently to these facts. Any opinions contained in this declaration reflect my personal opinion and judgment.
2. My primary residence is 3327 Eagle Ridge Drive, Sierra Vista AZ, 85650. I have lived in Sierra Vista since 1995.
3. I am an active member of the Sierra Club, Grand Canyon Chapter. I've been a member since 1984. I am currently a volunteer with the Sierra Club Grand Canyon Chapter's Water Sentinels Program, a volunteer group that monitors the flow of

Arizona's San Pedro River and tests its water quality, and have been a member of the program since it began in Arizona in 2010.

4. Throughout my time in Sierra Vista, I have become closely connected to the San Pedro River and the San Bernardino National Wildlife Refuge, both of which fall within Tucson Sector Project 3.
5. Within a few months of arriving in Sierra Vista, I started connecting with people in my community who, like me, value and appreciate the natural world. I quickly became educated about the San Pedro River and the surrounding watershed, and I started to explore and recreate along the river. As an activist on San Pedro River issues, I spend a lot of my free time working to protect the San Pedro River and the watershed that supports it, including the desert washes that originate in the Huachuca Mountains and the groundwater aquifer that keeps the San Pedro River flowing all year round. My efforts to protect the San Pedro River have included participation for the last 19 years in the Upper San Pedro Partnership, a collection of 21 federal and state agencies and some private entities working to ensure that the long-term water needs of the Sierra Vista Subwatershed are met.
6. I bought my current house three years after moving to Sierra Vista. My house is just a fifteen to twenty minute drive to the San Pedro River, which allows me to regularly travel to the river. I enjoy walking along its trails, identifying native plants, bird-watching, and observing wildlife. In my time along the river, I have seen many neotropical migrant birds, which use the San Pedro River's riparian habitat as a migratory stop-over site, as well as Mexican specialty birds like Gray Hawks that come to the river to breed in the summertime. I have also seen the western Yellow-

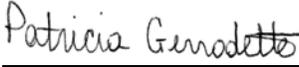
billed Cuckoo, which is a listed species under the Endangered Species Act. When friends come to town to visit, I often take them to the San Pedro River, because it is a jewel in our community. These days, I travel to the San Pedro River about once a month to visit, walk with friends, exercise, and observe the wildlife and vegetation that rely on the river.

7. The proposed border wall at the San Pedro River touches directly on the work that I've been doing for the past 24 years and is deeply upsetting to me. I am concerned about what the wall will do to the flow of the river. I don't see how this wall will be any different than walls that have failed along the border in the past. Experience with other sections of the border wall suggest that the wall will cause debris to accumulate in the river; in the worst case, it may cause the border wall to blow out as it did in Lukeville and Nogales. I also worry that the border wall and its construction will harm the plant and animal species living along and migrating through the San Pedro River ecosystem.
8. As I've mentioned, I regularly visit the San Pedro River. However, if construction moves forward, it will deter me from visiting as often as I once did. I will avoid the noise, dust, and unsightliness of a construction zone in a place I love so dearly for its natural beauty.
9. I am also deeply worried by the proposal along the San Bernardino National Wildlife Refuge. While construction itself is hugely disruptive, it is the proposed permanence of an impenetrable barrier that I find most distressing. The wall will prevent wildlife from crossing, thereby disrupting natural migration patterns. Such disregard for the needs of other life is very upsetting to me.

10. I am aware that President Trump declared a national emergency on February 15, 2019 in order to construct a wall along the U.S.-Mexico border. It is my understanding that the Secretary of Defense has recently authorized funding, and imminently plans to construct, Tucson Project 3. I am concerned that the border wall and its construction will destroy the natural beauty and ecosystems of the San Pedro River and the San Bernardino Wildlife Refuge as well as my ability to enjoy these places.
11. For all of these reasons, the proposed border wall in Tucson Sector Project 3 will injure me recreationally, aesthetically, spiritually, 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 27, 2019



Patricia Gerrodette