

Exhibit 6

**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 Margaret Case</p>
---	---

My name is Margaret F. Case. The information in this declaration is true and correct, based on my experience, and my review of publicly available information:

1. I am a member of the Sierra Club, and have been since 1990. My interest in the natural areas of southeast Arizona, and my concern for those areas, led me to join the Sierra Club's Borderlands Team.

2. I reside in the rural area know as Palominas, in southern Cochise County, Arizona. I have lived in the area for over 11 years. As the crow flies, my home is approximately four miles from the San Pedro River, and approximately 5 miles from a wall segment that runs along the United States-Mexico border. The border wall and the foliage corridor along the San Pedro River are visible from my house's

patios. The Coronado Memorial is a short drive from my home—approximately ten minutes. The San Bernardino Wildlife Refuge is also in our county, to the east of my house.

3. I understand that the Tucson Section Project 3 involves the construction and replacement of border wall sections that include the San Pedro River, the San Bernardino Wildlife Refuge, and areas south of the Coronado Memorial.

4. I use and enjoy the areas affected by the border wall—from my home, and on excursions with friends and visitors. Indeed, my husband and I spent our first Christmas Day in Arizona visiting the Slaughter Ranch and the San Bernardino National Wildlife Refuge. We are both birders; on that first trip, on a track running parallel to the Normandy-style ‘vehicle barriers’ currently along the border, we saw our first Black Phoebe.

5. The border areas and their natural beauty have been a central element of my life here since we moved to Arizona from Kentucky. Shortly after arriving, I went on an overnight Sierra Club outing along the border. My goal was to learn about the southeast borderlands area, which I intended to be my home for the rest of my life. That trip took us to the Buenos Aires National Wildlife Refuge, the San Pedro Riparian National Conservation Area, and to the Coronado National Memorial.

6. Since then, I have grown more familiar with the landscapes of southeast Arizona. I continue to regularly visit the San Pedro River. I saw my first Gray Hawk at the San Pedro Riparian National Conservation Area. My husband and I have an annual tradition of hiking at the San Pedro House (in that Conservation

Area) on Thanksgiving Day. When friends and family visit, we routinely take them to the Coronado National Memorial; we, along with them, are always dazzled by the sweeping vistas of the continuous landscape shared by the United States and Mexico.

7. My pleasure in living along the border is immensely enhanced by my knowledge that there are wolves, bears, ocelots, and even jaguars that inhabit those lands, prowling in secret and filling crucial, and unique, ecological niches. Just a few days ago, on a trip into nearby New Mexico, my husband and I spotted a wolf standing in the brush. I never thought I might see a wolf. Doing so was the thrill of a lifetime, and one that deepened my appreciation of the presence of such wildlife in my own backyard neighborhood, as well as my concern that border-wall construction will inhibit the mobility upon which those species depend.

8. The construction and expansion of the border wall, both as the construction proceeds and in the hard infrastructure that it will produce, will diminish the values that caused me to choose these borderlands as my home.

9. I understand that the proposed 'pedestrian' barriers will impose significant, often impassable, barriers to the wildlife that currently inhabit areas on both sides of the border. Near my home, wildlife such as deer and javelina have been photographed, in apparent consternation, unable to cross such barriers. I personally have heard the frustration of a neighbor—a long-time rancher—whose property is bounded by the border wall and road for many miles. His family has ranched that land for three generations. He describes a sharp drop in the deer population, as

border barriers increase. These and other similar stories suggest to me that the decrease in observable wildlife in my own property may be due to border enforcement activities; I find the notion of increasing the structures and human activities that interrupt the flows of wildlife, and water, painful, almost viscerally so.

10. I am also concerned that increased human activity along the border, and more substantial border walls and infrastructure, will affect the diverse bird life that provides one of the greatest pleasures of my current home. A higher, less permeable wall will impair the visibility that makes the border such an enticing bird-watching area. Many birds depend upon rabbits and other prey species that are likely to be disrupted by construction activities, and whose habitat will be fragmented by the wall; and their own nesting habitat, especially along the rivers, is likely to be adversely affected. Birds that frequent this area depend upon a delicately balanced habitat, which exists in only a few places around the world; disrupting the habitat of these birds disrupts and diminishes my own life.

11. I have read articles documenting the manner in which border-wall construction disrupts delicate ecosystems, adding sediment to rivers and streams, adding vehicular traffic and other human activity, contributing light pollution, and inhibiting wildlife corridors. And I have personally seen how the Department of Homeland Security's border walls, roads, and traffic have diminished the beauty and serenity of the border region where I live.

12. At night, from my house, I can watch the lights of Border Patrol vehicles on the roads that the agency has built in previously roadless areas. In our part of the world, dark night skies are a pride and joy; law enforcement lighting, which I understand will be exacerbated by the proposed project, is an intrusive nuisance and decreases my enjoyment of the area. I am additionally worried about nocturnal animals, whose activities and habitat are disrupted by night-time lights and activity.

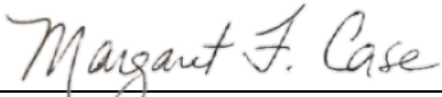
13. With each increase and escalation in enforcement along the border, my and other border residents' quality of life decreases. I once enjoyed taking visiting friends and family to the actual border; as access roads have been closed, such trips have become very difficult. Law enforcement activities which claim to limit northbound human migration are in fact limiting my own freedom and mobility, and my ability to show visitors where I live, and what I enjoy. The proposed wall will, moreover, extend an already unwanted eyesore in the middle of a landscape whose beauty I treasure, irrevocably harming my enjoyment of that landscape.

14. I am greatly concerned about the federal agencies' refusal to comply with environmental statutes that Congress passed to protect natural and cultural resources. I chose to live the rest of my life in this area; when deciding to do so, I relied upon those legal protections to protect the lands around my home, never dreaming that they would be rendered impotent with the stroke of a pen.

15. For all of those reasons, the proposed Tucson border wall project will cause me and my family irreparable harm. An order preventing the wall's construction would remedy that harm.

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 24, 2019



Margaret Case