

# Exhibit 2

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

SIERRA CLUB and SOUTHERN  
BORDER COMMUNITIES  
COALITION,

*Plaintiffs,*

v.

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,

*Defendants.*

Case No.: 4:19-cv-00892-HSG

**Declaration of Ralph Hudson**

I, Ralph Hudson, declare as follows:

1. My name is Ralph Hudson. 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 judgement.

2. My primary address is 427 Stone Road, Gilmanton Iron Works, New Hampshire 03837. However, I have owned property in Ajo, Arizona for almost two decades and I am a member of Sierra Club's Grand Canyon Chapter in Southern Arizona.

3. I support the Sierra Club's mission and goals to encourage the public to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives.

4. I am a current member of Sierra Club and first joined in 2012.

5. I have been recreating in the wilderness areas along the U.S.-Mexico border in what U.S. Customs and Border Protection (CBP) refers to as the Tucson Sector for over 20 years. My love of this unique desert ecosystem led me to build my house in Ajo back in 2001. I use the lands close to the border in the Cabeza Prieta Wildlife Refuge and Organ Pipe Cactus National Monument to hike, take photos, and explore the natural history. I have been traveling to the areas in and around the proposed Tucson Projects 1 and 2 since 1997. I travel to these areas several times each year, sometimes for a week at a time.

6. Access to the Cabeza Prieta Wildlife Refuge, near the border, is along the El Camino del Diablo. Its proximity to the border makes hiking right to the current barrier possible. On foot you feel extremely connected with nature and I can hardly imagine the juxtaposition of this high border wall with the desert landscape. I have wonderful memories and photographs of the original border obelisks which served as the only demarcation of the border until about 10 years ago. It looks to me like little has changed along the border in these wild places in terms of human traffic. Away from a few well known crossing spots it has remained the same. These wild places are empty of people despite recent rhetoric about waves of migrants crossing the border.

7. I love hiking, camping, and taking photos in this remote wilderness. I cannot fathom seeing an 18 to 30 foot barrier when I focus my camera on Kino peak or seeing a tall barrier strung out behind Monument Bluff just south of the El Camino on the Cabeza Prieta NWR. These are special places which fulfill the Wilderness Act's goal of being places "untouched by the hand of man."

8. Over the past few years, I have also enjoyed visiting Quitobaquito Springs. This UNESCO World Heritage Site is less than a half mile from the U.S.-Mexico Border. Because of its proximity to the border you can even see traffic along Mexico's Route 2. As a water source within this desert

ecosystem, Quitobaquito Springs is extremely important to wildlife in the area. The replacement of penetrable vehicle barriers with pedestrian fencing will have a tremendous impact on the species that rely on this water source.

9. The current barrier is bad enough but, for the most part, it does allow desert animals to wander through this landscape as they always have. I am distressed that this may no longer happen and I fear that fragmenting their habitat may have unimaginable impacts. I have seen coyotes, javelina, bighorn sheep, pronghorn, and various reptiles in my Cabeza travels.

10. One of my favorite aspects of camping in these areas along the border is my ability to see the stars. There is very little light pollution in these areas, however, the proposed border construction will drastically change this reality. I have always been able to come out here and look up at the sky and see the Milky Way. If these projects move forward, the lighting will drastically impact my ability to stargaze in this beautiful border region.

11. I plan to continue returning to these unique landscapes along the border as long as I am able, but I am extremely concerned that Tucson Projects 1 and 2 will greatly detract from my ability to enjoy hiking, camping, and photographing these landscapes. The physical barrier alone is a blight on this landscape.

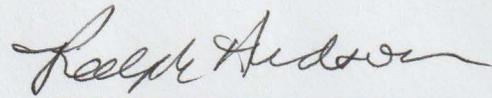
12. I am aware that President Trump declared a national emergency on February 15, 2019 in order to construct a wall along the U.S.-Mexico border.

It is my understanding that the Secretary of Defense has recently authorized funding for Projects 1 and 2 in the Tucson Sector. I am concerned that the border wall and its construction will adversely impact the expansive area around and including Cabeza Prieta Wildlife Refuge and Organ Pipe Cactus National Monument, its ecosystems, and the many people like me who recreate in these places.

13. For all of these reasons, the proposed border wall in Tucson Sector Project 3 will injure me recreationally, aesthetically, 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 26, 2019

A handwritten signature in cursive script, appearing to read "Ralph Hudson", written in black ink. The signature is positioned above a horizontal line.

Ralph Hudson