

Exhibit 3

**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 Kevin Arthur Dahl</p>
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My name is Kevin Arthur Dahl, 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 1609 E. Spring St., Tucson, AZ. I have lived in Tucson for 42 years and Arizona for 53 years.
3. I am a current member of the Sierra Club and have been a member since 1997. I support the Sierra Club's mission to explore, enjoy and protect the planet; 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. I have been a member of the executive committee of Sierra Club's Grand Canyon Chapter (Arizona-wide), which is a volunteer position.
4. I am the Arizona Senior Program Manager for the National Parks Conservation Association.

In this position I work to protect and enhance our National Park System for present and future generations with a specific focus on the Southwestern region of Arizona.

5. Throughout my time in Arizona, I have explored and worked to protect public lands including the Organ Pipe Cactus National Monument. I love the remote and rugged landscapes of Southwest Arizona, the native plant and animal species that live here, and the recreational opportunities these lands provide. I regularly spend time in Organ Pipe Monument, especially in the areas along the border that include Tucson Sector Projects 1 and 2. I intend to return to these areas as long as I am able.

6. Organ Pipe Cactus National Monument is near and dear to me, and I have been closely connected with the Monument for more than forty years. I first visited the Monument in the early 1970s when I was living in Phoenix, Arizona. In the following years, I became involved in the wilderness designation process for the Monument, in which the Park Service reviewed their designations under the Wilderness Act. I spoke at hearings and organized the citizens' committee that wrote the wilderness boundaries and advocated for wilderness designation. Currently, I'm working on creating the Friends of the Organ Pipe Cactus National Monument, a group that will further advocate for the Monument, the plant and animal life that depends on it, and the people who use and enjoy it. I am deeply concerned that border wall construction and the wall itself would destroy an area I have worked so hard to preserve and protect.

7. I visit Quitobaquito Springs, maybe once a year, which is located less than half a mile from the border. In years past when it was allowed, I camped at this location. From Quitobaquito I can see Mexico's El Pinacate and Grand Desierto de Altar Biosphere Reserve, which was recently designated a UNESCO World Heritage Site. On March 2, 2018, I was there to make observations as part of a "Bio-Blitz" along with park staff, volunteers, scientists from the U.S. and Mexico,

and students from Arizona State University. Together we observed 116 species. We all saw the endangered Quitobaquito Pupfish. I photographed the elusive Howarth's White Butterfly, which only regularly comes into the United States at this location. Construction of a wall at and near Quitobaquito Springs will impede wildlife from crossing from Mexico to get to this vital source of water, impeding my enjoyment of wildlife observation at this biologically rich oasis.

Construction could also impact the hydrology of this wetland area, as its water shed extends on both sides of the border.

8. When I visit Organ Pipe Cactus National Monument, I like to stay at the main campground located behind the visitor center. This popular spot affords wonderful access to desert hiking and at night the sky is so clear and unimpeded by light that it seems you could almost touch the stars. The long view to the south into Mexico includes parts of the UNESCO World Heritage Site and a long reach of the border. I am aware that construction will require massive installation of temporary lighting and that the Tucson Sector border wall will include permanent lighting as well. These lights will prevent me from seeing the neighboring El Pinacate, impede the desert dark skies that are a hallmark of this landscape, and generally degrade my camping experience.

9. The beautiful landscapes in which Tucson Projects 1 and 2 are planned are home to unique plant and animal species including Sonoran pronghorn, desert big horn, mountain lion, javelina, white-tailed and mule deer, kangaroo rat, coyote, and other animals and plants common to the Sonoran Desert. Migrating bats call Organ Pipe Cactus National Monument home for part of the year, and migrating birds also make their way north and south across this landscape twice a year. Border wall construction will have lasting negative impacts on this ecosystem. As we've seen from previous border construction projects, native vegetation is uprooted which leads to the spread of invasive, non-native species and harms the animals that rely on native plants.

Construction will also degrade the beauty and integrity of these wild places and undermine their very purpose - to provide spaces “where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain” (The Wilderness Act).

10. It is my understanding that these project areas include the replacement of existing vehicle barriers with new pedestrian fencing. This type of fencing will further fragment wildlife habitat, preventing current migration patterns and likely leading to reduction of populations and possible local extirpation. Added to other modern stressors, this could lead to extinction. Any kind of barrier along the U.S.-Mexico border impedes the movement of wildlife and leaves them more susceptible to predators.

11. 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 Organ Pipe Cactus National Monument, its ecosystems and inhabitants, and the many people that enjoy it, myself included.

12. For all of these reasons, the proposed wall construction in the Tucson Sector 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 24, 2019

A handwritten signature in blue ink that reads "Kevin Dahl". The signature is written in a cursive style with a large initial 'K' and 'D'.

Kevin Arthur Dahl