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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

ANNE HAUSRATH, JOHN WHEATON,
JOANIE FAUCI, MEG FEREDAY, ROGER
ROSENTRATER, KATHRYN
RAILSBACK, DALE REYNOLDS, and
GREAT OLD BROADS FOR
WILDERNESS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
THE AIR FORCE,

Defendant.

Case No. 1:19-CV-00103-CWD

**DECLARATION OF PAMELA G.
CONLEY**

I, Pamela G. Conley, declare as follows:

1. I am over the age of 21 and competent to testify in this matter. The following facts are personally known to me, and if called as a witness I would and could truthfully testify to these facts.

2. I am currently the leader of the Boise grassroots chapter of Great Old Broads for Wilderness (“Great Old Broads”) and have been a member since 2014. Our chapter has over 100 members who advocate for and recreate in Idaho open spaces and public lands.

3. Great Old Broads is a national grassroots organization, led by women, that engages and inspires activism to preserve and protect wilderness and wild lands. Formed in 1989, Great Old Broads now has over 8,500 members and supporters, many of whom reside in and/or engage in recreational activities in Idaho.

4. Protection of wild places in Idaho is an important focus of Great Old Broads. The organization has worked to protect the Owyhee Canyonlands in southwestern Idaho, the last great unprotected expanse of the American West, and other treasured public lands that may be impacted by the Urban CAS project. The Boise grassroots chapter has been involved with helping to preserve the Boise foothills from various development projects, as well as providing public input on management plans for Idaho public lands. Great Old Broads, its members, and supporters also value the spirit and intent of national conservation legislation, such as the National Environmental Policy Act, and support sound science as a basis for informed decisions.

5. I personally am an active member of the Boise community, where I’ve lived for 34 years. I worked on the effort to establish Hulls Gulch as a natural preserve as well as Blacks Creek Bird Reserve east of Boise. I retired from federal service in January 2019 after 30 years of working on mapping and survey projects.

6. I have lived in the Highlands neighborhood of North Boise for 32 years. My daughter was born in the house that we live in and plans for it to be her home one day. Our house is close to the Boise foothills and all that open space, and there is no other place in Boise we’d rather live.

7. I love our city and surrounding areas. I spend many hours walking my dog in the Boise foothills, gardening in my yard, enjoying the view from my deck, and biking in town. I am an avid birder and spend many hours observing birds in Boise's various parks and open space areas as well as our public lands that surround the city such as the Birds of Prey area, Intermountain Bird Observatory, Bogus Basin Ski Area, Bureau of Land Management lands, and U.S. Forest Service lands. I frequently bicycle in town and commuted to work via bicycle before I retired. I enjoy meeting friends at restaurants with outdoor seating to have a meal and a beer.

8. There is nothing more rejuvenating than taking a long walk in the Boise foothills or going birding in the foothills, parks, or along the Greenbelt. The quiet allows me to forget that I live in a city and gives me a sense of peace in a frenetic world. The quiet lets me identify the birds that are around since you usually hear them before you see them. This serenity is necessary for my peace of mind and heart.

9. I first heard about the Air Force Urban CAS project from a friend. It seemed incredibly short sighted and scary. Comments were due on the proposal very shortly after I heard about the project and I joined forces with some others to submit comments.

10. When I heard about this project, I was reminded of an event that had happened a year or two ago. My husband and I were hiking in Hulls Gulch in the Boise foothills, and all of a sudden we heard jets flying overhead. The noise was so loud we had to stop talking to one another since we could no longer hear one another. Our dog was very upset and frantic. That experience was very frustrating and made me feel very angry. There was no peace that day on our hike.

11. This project will ruin Boise's reputation as a quality place to live. It will increase the frequency of these disruptive military overflights in Boise and other Idaho cities. This noise

pollution will diminish the serenity of our city—and my ability to use and enjoy outdoor areas in and around Boise. I can't live like that. Many other members of Great Old Broads enjoy recreating in quiet natural places in Idaho and will be similarly affected. I am also concerned that the Air Force did little research to examine the negative effects this project would have on our communities and wildlife.

12. I grew up as an Air Force “brat” and was born in an Air Force hospital. I understand that training needs to happen. But training programs that ignore and sideline the community in which the trainings take place is counterproductive to the Air Force’s mission. That mission is to protect us, not ruin our communities.

13. Making the Air Force do a proper EIS, one that looks at the current science, will allow a better decision to be made on how to implement a training plan. That will help me and other members of Great Old Broads to live with a decision that takes into account how this project would affect me and others.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 13th day of January, 2020, in Boise, Idaho.

/s/ Pamela Conley
Pamela G. Conley