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

ANNE HAUSRATH, JOHN WHEATON,
JOANIE FAUCI, MEG FEREDAY, ROGER
ROSENTERETER, 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 KATHRYN
RAILSBACK**

I, Kathryn Railsback, 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 a Plaintiff in this lawsuit.

3. My family and I have lived in Northwest Boise since 2001. I am married and have three children. Our oldest son, who was a valedictorian at Centennial High School, died in 2015. Our youngest son is presently a junior at Centennial High School.

4. I am an immigration attorney and have worked for roughly 35 years with survivors of armed conflict, beginning with working in Thailand in 1982 with war survivors from Vietnam, Cambodia, and Laos. My husband is a survivor of the Cambodian genocide. Since 2013 I have also been a volunteer facilitator with a community-based trauma-healing organization. Since 1982, either as an attorney or as a volunteer trauma program facilitator, I have worked with hundreds of trauma survivors from Cambodia, Vietnam, the Democratic Republic of Congo, Iraq, Somalia, Bosnia, Afghanistan, Nigeria, and numerous other countries. I work closely with social workers and health professionals and am familiar with the behavioral, psychological, physical, and emotional symptoms of trauma. I won the “Refugee Champion Award” award from the Idaho Office of Refugees in 2016 and was awarded a Pro Bono Service award by the Idaho Bar Association for organizing a collaborative program to provide pro bono naturalization assistance for senior, disabled, and preliterate refugees with volunteer lawyers, law students, social workers and health care professionals. I presently serve as a Lecturer and Director of the Immigration Law Clinic at the University of Idaho and commute between Boise and Moscow. My other activities in Boise have included serving as an active participant of Hyde Park Mennonite Fellowship, as a volunteer with the Idaho Peace Coalition, and on the Board of the Idaho Human Rights Education Center. As an immigration attorney, I have also worked with scores of agricultural workers from Burley to Caldwell in the proposed U.S. Air Force (USAF) training area.

5. My family and I spend a significant amount of time outdoors in Idaho. I am an avid hiker, camper and bicycle commuter. Working with trauma survivors and people with mental health issues typically entails a lot of stress, and I find that exercising outdoors and spending time in nature are the most effective therapies for managing my own stress levels. My husband spends a lot of time gardening outdoors, and all four of our children have participated in numerous outdoor sporting activities, including soccer, baseball, cross country, lacrosse, and track, throughout the year. Our youngest child currently runs cross country and is on the ski racing team and does many outdoor trips with the Boy Scouts.

6. I first heard about the Air Force Urban Close Air Support project at church. I attended the two public scoping meetings in Boise and was shocked and dismayed at the nature of the proposal, its large scale, the paucity of information provided, and the U.S. Air Force's (USAF's) apparent failure to follow the relevant environmental requirements. It appeared to me that USAF was trying to obscure not only what they were planning to do, but what they had done in the past in Boise. I found their cavalier attitude towards the public very troubling. Their numbers were contradictory and incomplete and their claims to be unable to obtain important information honestly seemed to be either deceptive or incompetent or both. The audience members and I asked many questions but were given very little concrete information. I found that the written materials provided later were similarly unhelpful and misleading.

7. I am opposed to this project for numerous reasons. I believe that conducting simulated attacks in Idaho could exacerbate the symptoms of trauma experienced not only by refugee war survivors and U.S. veterans but by the participating USAF members *themselves*. Based on my personal experience and my conversations with mental health professionals, I believe it could be psychologically unhealthy for U.S. servicemembers, some of whom have

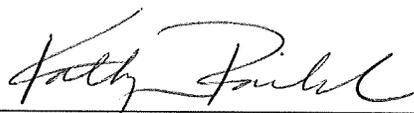
been through traumatic wartime experiences, to simulate armed attacks on their own homeland. Seeing military planes flying on a regular basis over our community and knowing that those planes are targeting individuals and structures in our community, even in simulation, could have negative mental health impacts on current and former U.S. servicemembers and the many refugees in our community and people like me who work regularly with war survivors. It would not be unusual for such exercises to have triggering effects.

8. I am also opposed to this project for its many negative environmental impacts, including negative impacts related to noise, air quality, pollution of soil and water, impacts on wildlife, and possible negative physiological impacts from the laser targeting. As mentioned above, spending outdoors in nature is very important to me and I try to spend time exercising outdoors each day, whatever the weather. I also worry about the effects on people who work outdoors for months at a time, including the large number of agricultural workers in our state.

9. As an attorney, I am troubled by the lack of information provided by USAF and by the poor way in which the public meetings were handled. It is incredible to me that the government would propose a project of this magnitude while providing the public so little information on its potential impacts. Also, it appears that USAF is considering other overlapping projects in our area and that their analysis does not adequately address the cumulative impacts.

10. A court decision requiring USAF to complete a rigorous Environmental Impact Statement will benefit me because I will have increased confidence that the environmental and other costs, including costs to our community members' physical and psychological health, will be fully reviewed by individuals with expertise in their fields and that the results will be fully reported for the public to review.

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



Kathryn Railsback