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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 JOHN WHEATON

I, John Martin Wheaton, 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. I grew up in North Idaho and graduated from the University of Idaho in 1977. After completing Masters of Business Administration at University of Rochester, NY in 1981 and moving to California for a position with Hewlett Packard Co., I returned to Idaho with my family in 1990. I have lived at my current home in North Boise for the past five years.

4. I have been retired since July 2016 and have been involved in volunteer work with Idaho Trails Association as the board treasurer. I have also volunteered for other local non-profit organizations that serve the local community. I have five grown children and four grandchildren.

5. I frequently hike, mountain bike and ski in the hills around Boise. At home I enjoy gardening and relaxing in our quiet edge of town where we are only a bike ride into the city. Most of my travel in Boise is done via bicycle and I mountain bike most of the year. I enjoy fly fishing in the Boise River drainage, floating on neighboring rivers and backpacking in Idaho's wilderness areas in the warmer months.

6. Boise is so close to isolated parcels where animals roam free and people are scarce. I, and many others, find personal solace in these semi-wild places. I hope to preserve the availability of these quiet, natural spaces for my children and grandchildren as they make their home here.

7. The military has been an important part of my family's life as my father and brother served in the US Navy. Their experiences in the service provided them with the strength and courage to persevere life. I value the military as a career option for young adults who want to serve their country. I see the military as an important part of protecting our country from outside aggression and protecting the world's disenfranchised populations.

8. However, I am deeply concerned about the impacts of the Urban CAS project on the quality of life in our state. As noise and congestion continues to grow in Boise, this project only adds to the burden on humans and wildlife. Additional noise overhead will be particularly disturbing to those such as myself who enjoy outdoor recreation and seek out quiet solitude in natural areas. Hearing a military jet while hiking, skiing, biking, or fishing in the Boise foothills and neighboring rivers will negatively impact my experience.

9. I also worry about the impacts to sleep quality of Boise residents. There are homeless sleeping outside and many residents, including myself, sleep with windows open all night. I am concerned that these flyovers will cause restless sleep for those of us exposed to the open air.

10. The impact on wild birds, bats, and other wildlife in our area at night is also a big concern and we need to understand the impact on them. The Air Force seemed to dismiss the possibility for wildlife impacts in its EA. Negative impacts to wildlife in areas where I recreate, whether through collisions, abandonment of habitat, or reproductive declines, would decrease my ability to observe and enjoy viewing such species in their natural habitat.

11. I feel these environmental impacts have not been rigorously assessed. The Air Force seemed to rush through to start the project without considering the impact on the community. Our city leaders, for some time, did not even acknowledge the existence of the project or how citizens could be impacted.

12. A court decision forcing the Air Force to complete an Environmental Impact Statement would give the Air Force, public officials, and citizens a better understanding of how this Urban CAS project will impact Idaho and possible mitigation strategies.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of January, 2020, in Boise, Idaho.

/s/ John Wheaton
John Wheaton