

Exhibit 4

DECLARATION OF LINDA HUHNS

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Linda Huhn. I was born in Minnesota and have lived in the state for 72 years, virtually all my life.

2. Nature has always been an integral part of my life. I grew up in the medium-sized, southwestern Minnesotan town of New Ulm on the Minnesota River. Nearly all land around the town was converted from prairie to farmland before my birth. Native prairie (tallgrass prairie is one of Minnesota's three biomes) is now 99% gone in the state according to the Minnesota Department of Natural Resources.¹ Our little house rested on a large treed yard at the edge of town. After a rain we often had frogs around our yard, most likely because of proximity to a wetland. The last frog I saw was when I was high school aged.

3. When I was a child, through high school, summer nights sparkled with fireflies. I slept to a chorus of crickets and woke to the cooing of mourning doves. The songs of many bird species were heard all day long. One of the first sounds I remember was the song of the Eastern Meadow Lark, now heard less often, even by farmers (according to a recent report from the Cornell Ornithology Lab, which in 2019 reported North America has lost 29% of its bird populations).² Northern Flickers, Chickadees, Northern Cardinals, Robins, and Blue Jays were everywhere. The Red-Headed Woodpecker was a common sight. Recent news articles report its population

¹ *Tallgrass Aspen Parkland*, The Nature Conservancy (2007), <https://www.nature.org/content/dam/tnc/nature/en/documents/mn-tallgrass-aspen-parkland-fact-sheet-2007-2.pdf>

² Gustave Axelson, *Nearly 30% of Birds in U.S., Canada Have Vanished Since 1970*, CORNELL CHRONICLE (Sept. 19, 2019), <https://news.cornell.edu/stories/2019/09/nearly-30-birds-us-canada-have-vanished-1970>

down by 95% in Minnesota because of loss of oak savanna habitat, of which we now have less than 1% of the original.³ This decline is related to increased urban sprawl due to population growth. This loss of something that marked my childhood in a large way, saddens me.

4. The wetland area near my home was alternately a cow pasture and corn field connected to oak savanna running up the overlooking hills. When I visited this area in my adult life after learning about native plants, I recognized species now less common in the hill's sandpit—various grasses and sedges, sand stickers and bittersweet bushes. The majority area of these hills and fields were sold for development years ago. Large building construction there has led to more and more of the oak savanna woods being cut down. Many newer homes sit atop the hill, where there once were farms and farm fields, ruining the erstwhile view of the sunset.

5. My interest in nature persisted as I grew. After high school I attended nearby Mankato State College, graduating in 1970, the year of the first Earth Day and the year NEPA was enacted. By my final year I had joined Zero Population Growth, continuing an interest in human population that I had had since researching and giving a presentation in high school. I also helped gather student signatures to allocate a share of college student fees as a permanent source of funding for Ralph Nader's Minnesota Public Interest Research Group (MPIRG). Later, I joined The Nature Conservancy (TNC) in 1980 (to which I've donated to every year since) and learned more about many of Minnesota's ecosystems that deserved preservation. I also participated in TNC volunteer work trips: I helped plant trees outside of a State Park to extend the forest area that had been cut down years ago for farmland; I also was part of an emergency action (about 30 of us) to replace soil furrows to save a delicate sand prairie area in southeastern

³ Jennifer Brooks, *Eyes on Empty Skies: Minnesota Bird Watchers Unsurprised by News of 3 billion-bird decline*, STAR TRIBUNE, (Oct. 8, 2019), <https://www.startribune.com/eyes-on-empty-skies-minnesota-bird-watchers-unsurprised-by-news-of-3-billion-bird-decline/562289422/>

Minnesota, (which was in danger of drying out) that an uninformed farmer had erroneously run his tiller through the night previous. Beginning with the first Earth Day, and into succeeding years, I was optimistic and hopeful about preservation and passing along an intact Earth to future generations. The Clean Air and Clean Water Acts became law. I donated to many environmental groups in the early 1970's that were saving whales, dolphins, sea turtles, tigers, elephants and rhinos, as well as the Sierra Club, Environmental Action, the World Wildlife Fund, the Union of Concerned Scientists (which spoke out against nuclear power proliferation), and the Natural Resources Defense Council.

6. Throughout this involvement, it was clear to me (and in those days recognized by the press and environmental experts) that population growth was directly and indirectly affecting biodiversity, nature, open spaces, not to mention my enjoyment of all these. According to Metropolitan Council figures, Minneapolis and its twin city, Saint Paul, have from 2010 to 2018 added 75,000 people. As of 2018 Minneapolis had a population of 429,382 residents., adding more than 46,800 people since 2010, equivalent to 12.2 percent growth; St. Paul's population during the same period grew by 27,900 people, for 9.8 percent growth.⁴

7. I later learned of the enormous impact that immigration was having on population growth, as immigration is now responsible for over 80% of U.S. population growth.⁵ In recent years I see everywhere in Minneapolis people from other nations and in greater numbers than I did in the early 1990's. The Minneapolis/St. Paul area in recent years has become home to a

⁴ Frederick Melo, *St. Paul and Minneapolis are Growing. Here's How They Compare to Other Metro Cities*, TWIN CITIES, (May 21, 2019) <https://www.twincities.com/2019/05/20/st-paul-and-minneapolis-lead-population-growth-across-the-twin-cities/>

⁵ Mike Allen, *A Growing Nation of Immigrants*, Axios, (Apr. 21, 2019), <https://www.axios.com/newsletters/axios-am-0f1c5786-d201-49d0-a1df-a00fd7fecf28.html?chunk=0#story0>

large number of refugees. An area of the city near the University of Minnesota campus is known as little Mogadishu because it is home to more Somali people than anywhere outside Somalia. Minnesota has about 57,000 Somali refugees altogether according to a recent *New York Times* article.⁶ Friends who work in schools tell of Somali families being quite large, such as having 11 children. One friend tells me, based on ages of young children she taught, that Somali mothers each have a baby about every year. I believe this generation of children will fuel a population balloon in the next generation that will add to our congestion and housing problems, as generations-long U.S. families are having fewer children than ever. I know that many government decisions have specifically sent refugee populations into our state, especially Minneapolis. The Department of State signs contracts with non-governmental organizations (NGOs) that directly send refugees into Minneapolis. A number of these NGOs, including Lutheran Social Service of Minnesota, Catholic Charities of Mpls/St. Paul, Catholic Charities of Winona, the MN Council of Churches, the International Institute, and Arrive Ministries, are located in Minnesota. The local citizens have never had the opportunity to speak out about they feel about these government actions. Nor do we get to see the contracts between the NGOs and the Department of State.

8. The Biden Administration has raised the refugee ceiling, and plans to raise it next further even more— altogether, an 8-fold increase in the number of refugees from 2020. Inevitably, this will mean that the Department of State will enter into further agreements with the Minnesota refugee resettlement which will lead to further resettlement in the community I live in. This will

⁶ Kimiko de Freytas-Tamura, *In Minneapolis Somali-Americans Find Unwelcome Echoes of Strife at Home*, NEW YORK TIMES, (Jun. 7, 2020), <https://www.nytimes.com/2020/06/07/us/minneapolis-somalis-george-floyd.html>

add to the population, an addition that over time will be far greater than simply the number of refugees settled here, because of chain-migration and the large families of the refugees.

9. I will be noticeably impacted by this population growth personally, as I have already been by population growth over the past few decades. In addition to that noted above, I have encountered additional negative impacts which I believe are a direct result of population growth, exacerbated by immigration. I will detail them below.

10. During my post-college years, I settled in Minneapolis. When I finally bought a car in my 30's and visited New Ulm more regularly, I found the trip grew longer as the Minneapolis urban area sprawled farther west. Instead of two hours, by the mid 1990's the 100-mile trip had stretched to nearly three. It was also less scenic. Construction of office buildings atop a hill overlooking the Minnesota River outside a western suburb I passed through meant destruction of about half the hill prairie I had always eyed for seasonal wildflowers. Traffic congestion at large in Minneapolis has also been on the rise, leading to lost time—and in aggregate—high opportunity cost both professionally and personally.

11. I became interested in photography in the early 1970's and focused much of my amateur efforts on nature subjects. I ended up becoming a professional event photographer but also sold some of my nature work on the side as stock for calendars and other publications. A favorite subject was butterflies. Because of learning about and photographing the Karner Blue butterfly on a professionally-led mid-90's field trip in Wisconsin, I became interested in its preservation. Unfortunately, the Karner Blue no longer exists in Minnesota; the last population disappeared with the installation of a county road through habitat in Anoka county—the Anoka Sand Plain—that took out a population of blue lupine, the sole caterpillar plant for the Karner Blue. I have since had to travel outside the state to see and photograph it. An entomologist

friend tells me of five other butterfly species once found in Minnesota that have also disappeared from the state *in my lifetime*. Moreover, I once enjoyed photographing native wildflowers on virgin prairie remnants near historic Fort Snelling near where the Minnesota River joins the Mississippi (this juncture is sacred to the Dakota). Sadly, much of this prairie area was bulldozed for light rail construction for the Minneapolis and St. Paul International Airport.

This development destroyed other virgin habitat, including part of a grove of ancient oaks also sacred to the Dakota. Below is one of the first photographs I took of a Karner Blue (female):



12. Because of my connection to the Minnesota Native Plant Society, which I joined in the mid-1980's (serving first as secretary, then later for about seven years as program director as well on the board of directors) and connection to people in the Minnesota Department of Natural Resources, I was asked in 2003 to be among those testifying before a legislative natural resources committee advocating increased funding for the Minnesota Scientific and Natural

Areas (SNA) program, which is funded through the Minnesota Legislative-Citizen Commission on Minnesota Natural Resources. It was established to protect rare landscapes and species that are examples of pre-settlement Minnesota. I testified to the value of these lands to me as a citizen, lover of nature, and nature photographer. Since that time one of my favorite places, the Helen Allison SNA, has development abutting it, with a house very near a boundary on one end. Not only does this encroachment impede my enjoyment of the Helen Allison SNA, it also threatens the SNA itself. For instance, invasive species are often carried by livestock and pets. I have seen horse tracks (though restricted) in the SNA. With this, I worry that much of the legislative and citizen activism in which I participated will be nullified if invasive plant species begin to take root.

13. Though Minneapolis sticks closely to its standards for the amount of green space within the city, the effects of increasing density threaten the remnant ecosystem areas around lakes (such as hundreds of trees being removed for a light rail line inside Minneapolis proper) and also my enjoyment of them as an urban dweller. Sharp population growth has also led to serious housing shortages. Tent camps for unsheltered people have been part of daily news for over two years. Sadly, many of these tent camps are impinging on the ecological integrity of suburban and urban open spaces per the camps' physical footprints or the trash and debris they produce. These reduce my enjoyment of these areas from a visual, functional, and recreational standpoint.

14. As a life-long Minnesotan, I love my state and I love Minneapolis, where I plan to continue living. I fear, however, that the effects of immigration-fueled overpopulation already upon us are not good for the natural or human environment of city or my state, and especially for lower-income people needing housing. We are experiencing congestion and increased costs of living such as higher rents and grossly higher property taxes, (overpopulation puts everything at

a premium), as well as destruction of historic homes, threatening the character of our traditional neighborhoods. Considering that the Biden Administration started with promises that it would instruct agencies to pay special attention to “Environmental Justice,” it is wrong that the Administration is blind to the greater impacts high levels of immigration have on low income and minority communities.

15. I am aware of the existence and provisions of NEPA and both saddened and frustrated that it has not been applied to actions that cause population growth. The authors of NEPA understood that there exists a strong public good in nature—via open spaces, recreation, visual beauty, biodiversity—and a need to safeguard this for future generations. But the agencies that implement immigration policy all have adopted NEPA regulations that ignore the environmental effects of immigration completely, and as a result, none of them do any environmental analysis. In my lifetime, I have already seen severe environmental changes brought on at least in part by immigration-led population growth. While I can only timidly imagine the exponential effects on future generations, NEPA mandates that the government does take a hard look at the effects of actions it takes before carrying them out. NEPA needs to properly be applied to immigration. If it had been, we may never have lost the natural landscapes and species in Minnesota that I miss being able to see and photograph. If our immigration agencies were to start applying NEPA now, and give Minnesotans a voice before bringing people into the state and driving growth, I think things would change. I want all future generations of Minnesotans have the possibility of a childhood similar to mine, where natural resources were available and enjoyable, where life was affordable, and where there was not a feeling of crowdedness.

16. I hereby declare under penalty of perjury, that the foregoing is true and correct.

Executed this 24 day of August, 2021.

A handwritten signature in cursive script that reads "Linda Huhn". The signature is written in dark ink and is positioned above the printed name.

Linda Huhn