

EXHIBIT 9

DECLARATION OF BRUCE D. ANDERSON

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

1. My name is Bruce D. Anderson and I reside at 9220 Grove Drive, Chisago City Minnesota which is considered part of the North Metro of the Twin Cities. I have lived here 4 years. Prior to that I lived in: Cloquet, MN (near Duluth MN) from 2000-2016; Grangeville, Idaho from 1990-2000; Spearfish South Dakota from 1988-1990; Red Lodge Montana from 1983-1988; Watford City North Dakota, from 1978-1983; Fargo, ND from 1974-1978; Crookston, MN from 1972-1974; and South St. Paul, MN from birth in November 1953 to attending college in 1974.
2. My interest in the natural world and conservation arose while in high school when my parents purchased 120 acres of forest land and wetlands in north central Minnesota. I began to appreciate natural landscapes and wild places on this property that launched my natural resources education and career.
3. I graduated from North Dakota State University in 1977 with a degree in Range Management (Botany Department) with a minor in Wildlife Management. Following graduation, I began a career with the US Forest Service as a Range Management Specialist and Wildlife Biologist in the National Grasslands of SE North Dakota. I continued this career in the Badlands of Western North Dakota, the Black Hills National Forest (NF) of South Dakota, the Custer NF in South Central Montana, Nez Perce NF in West Central Idaho and finally the Superior NF in Northeast Minnesota. Following my federal Forest Service career, I was hired by the Minnesota Department of Natural Resources and had a four-year career as an Assistant Wildlife Manager in northern and south central Minnesota.

4. During my natural resource career, I was involved with and/or responsible as program manager for wildlife management, wilderness, wild and scenic rivers, non-native invasive species (NNIS), range management, oil and gas development, mining, developed recreation and trails, fire effects monitoring and timber management. Involvement in these programs and areas has given me a working knowledge of ecosystem function and process across diverse landscapes including montane, canyon lands, northern plains prairies, the north woods, open brushlands and hardwood forests. This has allowed me to recognize, plan and execute management that sustained or enhanced ecosystem health. It also made me aware of the close relationship between population growth in the United States and environmental impacts.

5. When I was in elementary school in 1964, the U.S. population was only 190 million. It is now over 328 million. Immigration, both legal and illegal, has contributed to the rapid growth of Minnesota's population. In Minnesota immigrants comprise 10% of the population, and their children have led to even more population growth. Minnesota had about 113,000 foreign-born residents in 1990, but that number had more than quadrupled to about 457,200 residents by 2015. The net change for Minnesota's foreign-born population was an *annual* increase of 13% between 1990 and 2000, 4.5 % between 2000 and 2010 and 4.2% between 2010 and 2015.¹ By comparison, population growth due to natural increase in Minnesota was less than 1%, .6% and .4% annually during those same years. The driver of Minnesota's population growth is projected to shift by 2031 when population gains from net migration are anticipated to outpace natural

¹ See Minnesota State Demographic Center at <https://mn.gov/admin/demography/news/ada-to-zumbrota-blog/?id=36-291406>

increase.² Because of my long career in resource management has lead me to understand how profoundly population growth affects the environment, this unending population growth fills me with worry. Population growth leads to development and urban sprawl. I have observed firsthand the loss of open space and wildlands stemming from urban and rural sprawl in all five states I've lived and worked in and many states I've travelled through. But the loss of the open spaces in Minnesota are especially saddening for me to experience.

6. As a native Minnesotan, two natural landscape features that have always been especially important to me are native grasslands and wetlands, particularly prairie wetlands. Over half of my natural resource career I've been involved with grassland and prairie management and during that time and continuing through today, I've developed a genuine appreciation and love for grasslands through personal experience with them. Historically, Minnesota's prairies and "Big Woods" forest covered the land in the state—and now it has nearly disappeared. The loss of native prairie has diminished species and habitat diversity. Because of prairie's fertile soil the vast majority of native prairie has been converted to agricultural production. It is Minnesota's most endangered habitat type. I deeply value my experience exploring and protecting the prairie and deeply mourn and worry it will continue to disappear. The near elimination of native prairie has inspired many efforts to protect remaining parcels, but the pressure to further develop the lands of Minnesota will only increase if population continues to grow at a high rate through immigration.

² Id. at <https://mn.gov/admin/demography/news/ada-to-zumbrota-blog/?id=36-291406>

7. Although less involved, I also was responsible in management and protection of wetlands and hardwood forests. Historically, Minnesota's "Big Woods" forest covered extensive area of the state— but now they have nearly disappeared. By the turn of the 21st Century, wildland retaining much of their original wildness and naturalness constituted only 7 percent (3.1 million acres) of the state. Today I search out and continue to explore protected tall grass prairie, hardwood forest and wetland remnants. Unfortunately, today these landscapes are rare, due in part to the development caused by immigration driven population growth.

8. In Minnesota, within the Twin Cities 7 county Metro Area (SCMA), the average number of homes permitted between 2000 and 2015 was approximately 13,000 homes per year. Based on the upswing in construction the past several years, it is estimated the average annual permitted homes will approximate 18,500 for the SCMA. Assuming this permitting rate continues the next five years, by 2022 up to 92,500 new homes could be built in the larger metro area. Accepting that the average urban land use per 1,000 urban residents is 0.6 square miles or 384 acres per [1,000 urban residents](#) and a [2.5 household average](#), it is estimated that between 78,000 acres and 110,000 acres could be developed annually. Recognizing that immigrants constitute [10% of Minnesota's population](#) and that current immigration rates will continue or possibly accelerate, I worry that that the prairie and wetlands will only continue to be further encroached upon.

9. I am an avid a birdwatcher and student of natural history, and my enjoyment of these activities has become more and more threatened by this kind of urban sprawl and other development caused by population growth encroaching ever further into the

native wildlands I cherish. While engaged in a natural resource career and as a student of natural history in Minnesota, the Blackhills, North Dakota, Montana, and Idaho, over time I have personally witnessed the dramatic decline of many species including endangered species such as the Western Fringed Prairie Orchid, the Piping Plover and Black Footed Ferret. These species have brought me substantial enjoyment for much of my life. I greatly fear that if federal government driven population growth continues or accelerates, these unique species will disappear altogether.

10. This sprawl not only directly displaces native and rural habitats but has indirect affects to the environment including increased recreational pressure on adjacent open space, accelerated pollution to watersheds and air sheds, the need for additional roads and highways that displaces yet more open space and uncared for pets particularly house cats. It is not only that roads and houses are directly displacing former wild lands—pressure from an expanding population are exasperating this loss . Motorized recreation on public lands has sharply increased as ever more people crowd into the remaining spaces for their enjoyment of nature. This increase has threatened wildland character because of the unauthorized creation of roads and trails and the associated erosion, water-quality degradation, habitat destruction and wildlife harassment. ATVs are also a major factor in the spread noxious and invasive weeds. Over the past forty years I have personally seen the huge proliferation of motorized recreation resulting in the loss of solitude. Moreover, the physical and acoustic footprint of these vehicles negatively impacts big small game and non-game species particularly during the breeding season and throughout the winter. Displacement during winter depletes energy reserves needed for survival and reproduction by mammals and birds. I have also

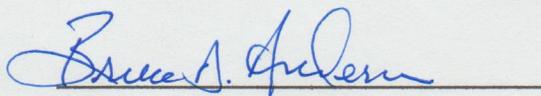
witnessed entire landscapes in Minnesota and western states succumb to invasive plant expansion over time. I've seen where invasive plant species establishment and spread has completely displaced native habitats further jeopardizing rare plants and wildlife.

11. In summary, the opportunity to experience natural landscapes, wildlife and wild places has drastically diminished during my lifetime. I fear my grandkids will have only a fraction of remaining wildlands to enjoy when they are adults. This loss is driven by an ever-expanding population with an insatiable appetite for consumer goods which in turn is propelled by a broken immigration policy. To sustain a quality of life that we have all grown accustomed to, we must ensure that our wildland heritage be preserved which can only be accomplished if the US Government enacts and implements a sustainable immigration policy.

12. As a Forest Service range conservationist, I am familiar with the National Environmental Policy Act (NEPA)—in fact I have been responsible for various aspects of environmental analysis under NEPA myself. NEPA requires that the federal government contemplate environmentally significant actions before carrying them out. Our current system of NEPA analysis requires environmental analysis before far less significant actions than immigration. Examples including performing NEPA analysis for cattle grazing and trail construction on public lands. Yet tens of millions of people are granted permission to move to this country permanently and the government never even considers the environmental impacts? I know that it is arbitrary and capricious that DHS and USCIS carry out no NEPA analysis.

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

Executed this 23rd day of November, 2020.



Bruce D. Anderson