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14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

18 **STATE OF CALIFORNIA et al.;**
19 Plaintiffs,
20 v.
21 **DONALD J. TRUMP, in his official**
22 **capacity as President of the United States of**
23 **America et al.;**
24 Defendants.

Case No. 4:19-cv-00872-HSG
**DECLARATION OF HEATHER LESLIE
IN SUPPORT OF MOTION FOR
PARTIAL SUMMARY JUDGMENT
REGARDING SECTION 2808 AND
NEPA**
Date: November 20, 2019
Time: 10:00 am
Judge: Honorable Haywood S. Gilliam,
Jr.
Trial Date: None Set
Action Filed: February 18, 2019

1 I, Heather Leslie, declare as follows:

2 1. I have personal knowledge of the facts set forth in this declaration. If called as a
3 witness, I could and would testify competently to the matters set forth below.

4 2. I am employed by the California Department of Justice, Office of the Attorney
5 General, and currently serve a Deputy Attorney General within the Office's Public Rights
6 Division, Environment Section. I am a licensed member of good standing with the California
7 State Bar and represent the State of California in the above-captioned matter.

8 3. In my role as one of the attorneys representing the State of California in this
9 matter, on September 10, 2019, I e-mailed Andrew Warden, an attorney with the United States
10 Department of Justice and counsel for the Defendants, requesting the latitude and longitude
11 coordinates for the border barrier projects identified on page 4 of Exhibit 1 of the Notice of
12 Decision by the Department of Defense to Authorize Border Barrier Projects Pursuant to
13 U.S.C. § 2808, ECF No. 206-1.

14 4. On September 23, 2019, I received an e-mail from Andrew Warden, counsel for
15 Defendants, stating "Attached is a chart listing the coordinates for the 2808 projects." Attached to
16 that e-mail was the list of coordinates I have attached hereto as Exhibit 1. I shared this list of
17 coordinates with other attorneys representing the State of California in this matter and we
18 provided this list of coordinates with our declarants for their use in determining the proposed
19 location of the border barrier projects that Defendants seek to construct under 10 U.S.C. § 2808.
20 This list of coordinates is the only information I received from the Defendants in response to my
21 September 10, 2019 e-mail.

22 I declare under penalty of perjury under the laws of the United States that the foregoing is
23 true and correct. Executed on October 11, 2019, at Sacramento, California.

24
25 /s/ Heather Leslie
HEATHER LESLIE

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EXHIBIT 1

2808 Project Coordinates

Project	Lat Start	Long Start	Lat End	Long End	Fence Program	Fund Type
El Centro 5	32.66609683	-115.4825268	32.66639969	-115.4783807	Secondary	2808
El Centro 5	32.66441744	-115.50539	32.66502661	-115.5003213	Secondary	2808
El Centro 9	32.65298241	-115.6621623	32.65674745	-115.6119704	Secondary	2808
El Centro 9	32.65674745	-115.6119704	32.65997305	-115.5685476	Secondary	2808
El Centro 9	32.65997305	-115.5685476	32.66268114	-115.5317336	Secondary	2808
El Centro 9	32.66268114	-115.5317336	32.66400527	-115.5107808	Secondary	2808
El Centro 9	32.66672509	-115.4740716	32.67008528	-115.4310461	Secondary	2808
El Centro 9	32.66400527	-115.5107808	32.66441744	-115.50539	Secondary	2808
El Centro 9	32.66639969	-115.4783807	32.66672509	-115.4740716	Secondary	2808
El Centro 9	32.67008528	-115.4310461	32.67065177	-115.4231003	Secondary	2808
San Diego 4 (1&2)	32.55576079	-116.877791	32.55675216	-116.866256	Secondary	2808
San Diego 4 (1&2)	32.55675216	-116.866256	32.56012814	-116.8414011	Secondary	2808
Yuma 6 (1&2)	32.71603068	-114.7605058	32.71764807	-114.7365576	Primary Pedestrian Replacemen	2808
Yuma 6 (1&2)	32.71905241	-114.7191752	32.70406484	-114.7257261	Secondary	2808
Yuma 6 (1&2)	32.71643589	-114.7606214	32.7167382	-114.7560448	Secondary	2808
Yuma 6 (1&2)	32.7167382	-114.7560448	32.71825951	-114.7284394	Secondary	2808
San Diego 4 (1&2)	32.55637513	-116.8658211	32.55768939	-116.8531846	Primary Pedestrian	2808
San Diego 4 (1&2)	32.55535062	-116.8777419	32.55637513	-116.8658211	Primary Pedestrian	2808
Yuma 6 (1&2)	32.71869511	-114.719492	32.70419718	-114.726013	Primary Pedestrian	2808
Yuma 6 (1&2)	32.71815515	-114.7282353	32.71824028	-114.7269522	Primary Pedestrian	2808
El Paso 8 (1&2)	31.33337004	-108.6176304	31.33337005	-108.6175192	Vehicle to Pedestrian	2808
El Paso 8 (1&2)	31.3329165	-108.7158582	31.33337004	-108.6176304	Vehicle to Pedestrian	2808
El Paso 8 (1&2)	31.33333552	-108.7158147	31.33375248	-108.6176157	Secondary	2808
San Diego 11	32.57427251	-116.6581131	32.57670274	-116.6282079	Secondary	2808
San Diego 11	32.57687801	-116.6260834	32.57866339	-116.6045492	Secondary	2808
El Paso 2	31.33336836	-108.5824119	31.33340657	-108.4792601	Vehicle to Pedestrian	2808
El Paso 2	31.78372235	-108.1824416	31.78371909	-108.1582742	Vehicle to Pedestrian	2808
El Paso 2	31.33231251	-108.9321214	31.33229403	-108.8986798	Vehicle to Pedestrian	2808
El Paso 2	31.332323	-108.962631	31.33231251	-108.9321208	Vehicle to Pedestrian	2808
El Paso 2	31.78371916	-108.1566405	31.78370825	-107.9631931	Vehicle to Pedestrian	2808
El Paso 2	31.33229403	-108.8986798	31.33229168	-108.8859448	Vehicle to Pedestrian	2808
Yuma 2	32.36531415	-114.3866211	32.3579244	-114.3623999	Primary Pedestrian Replacemen	2808
Yuma 3	32.23292391	-113.955219	32.19928542	-113.8465093	Vehicle to Pedestrian	2808
Yuma 3	32.1935563	-113.8280496	32.18621857	-113.8044093	Vehicle to Pedestrian	2808
Yuma 3	32.18075874	-113.7868986	32.17759305	-113.776713	Vehicle to Pedestrian	2808
Yuma 3	32.15087662	-113.6908774	32.05685869	-113.3906895	Vehicle to Pedestrian	2808
Yuma 3	32.05345764	-113.3798902	32.0390333	-113.3341097	Vehicle to Pedestrian	2808
Yuma 3	32.05685869	-113.3906895	32.05381251	-113.3810172	Vehicle to Pedestrian	2808
Yuma 10/27	32.41373234	-114.5445796	32.35831411	-114.3621746	Secondary	2808
Yuma 10/27	32.35454649	-114.3498202	32.26078649	-114.0440488	Secondary	2808
Yuma 10/27	32.41831713	-114.5597239	32.41373234	-114.5445796	Secondary	2808
Laredo 7	28.19685431	-100.2088407	28.12144242	-100.0703333	Primary Pedestrian	2808
Laredo 7	28.12144242	-100.0703333	28.02047236	-100.0053196	Primary Pedestrian	2808
Laredo 7	28.02047236	-100.0053196	27.86156482	-99.89227461	Primary Pedestrian	2808
Laredo 7	27.86155739	-99.89226627	27.74799699	-99.8004009	Primary Pedestrian	2808
Laredo 7	27.74799699	-99.8004009	27.73322231	-99.77084466	Primary Pedestrian	2808
Laredo 7	27.73322231	-99.77084466	27.70087	-99.74378	Primary Pedestrian	2808

The coordinates are not survey accurate and are subject to change

California v. Trump, 19-CV-872 (N.D. Cal.)
 Sierra Club v. Trump, 19-CV-892 (N.D. Cal.)
 Produced by Defendants on Sept. 23, 2019