

# EXHIBIT A

## SECOND DECLARATION OF BRIGADIER GENERAL GLENN A. GODDARD

I, Glenn A. Goddard, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Brigadier General in the United States Army and am currently the Deputy Director for Military Programs at the Headquarters of the U.S. Army Corps of Engineers (Corps). Among other duties, I serve as the National Program Manager for the Corps' Southwest Border Infrastructure Program.

2. This declaration is based on my own personal knowledge and information made available to me in the course of my official duties.

3. As described in my previous declaration of September 3, 2019, on that date the Secretary of Defense decided to undertake eleven military construction projects pursuant to 10 U.S.C. § 2808. To date, the Corps has awarded construction contracts for seven of these projects: Yuma 2, Yuma 10/27, San Diego 4, Yuma 3, Yuma 6, and segments of El Paso 2' and El Paso 8.

4. In my previous declaration, I explained that the Corps anticipated the earliest date on which any ground-disturbing activities could occur for these projects was 20 days after contract award, and the earliest date on which substantial construction could occur for these projects was 40 days after contract award. The Corps has adhered to this timeline for Yuma 2 and Yuma 10/27 (awarded November 6, 2019), San Diego 4 (awarded November 19, 2019), and Yuma 3 (awarded December 2, 2019).

5. With respect to the remaining projects, however, the Corps is now able to move with greater speed. Due to efficiencies that have been gained during the award and administration of the first several construction contracts, the Corps is prepared to begin ground-disturbing activities as early as five days after contract award and substantial construction as early as ten days after contract award, as set forth below:

<b>Project Name</b>	<b>Award Date</b>	<b>Earliest Ground Disturbing Activities</b>	<b>Earliest Substantial Construction</b>
Yuma 6	January 10, 2020	January 24, 2020	January 29, 2020
El Paso 2 (Segment 3)	January 17, 2020	January 24, 2020	January 29, 2020
El Paso 2 (Segment 2), El Paso 8 (Primary)	January 17, 2020	January 24, 2020	January 29, 2020
El Paso 2 (Segment 1)	TBD	5 days after award	10 days after award
El Paso 8 (Secondary)	TBD	5 days after award	10 days after award
San Diego 11	TBD	5 days after award	10 days after award
El Centro 5	TBD	5 days after award	10 days after award
Laredo 7	TBD	5 days after award	10 days after award
El Centro 9	TBD	5 days after award	10 days after award

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 22nd day of January, 2020.

A handwritten signature in black ink, appearing to read "Glenn A. Goddard", written over a horizontal line.

Glenn A. Goddard  
Brigadier General, United States Army