

DECLARATION OF SANDRA BAHR

- 1. I, Sandra Bahr, am a member of the Sierra Club. I have been a member of the Sierra Club since 1992. I am also the Director the Grand Canyon Chapter of the Sierra Club, the chapter of the Sierra Club that covers the state of Arizona. I have held this position since January 1998. The following information is within my personal knowledge.
- 2. I regularly visit Saguaro National Park directly east of Tucson. In the past two summers, ozone levels in the Park have exceeded federal health standards. I am concerned about the impacts to my health due to the high ozone levels in the Park. I am also concerned about the impact of elevated ozone levels on the Park's resources, including the iconic Saguaro cacti, which I enjoy viewing when I visit the Park. I plan to visit Saguaro National Park within the next six months, but if the air quality is bad I will be forced to limit my activities according to the applicable health advisories.
- 3. I am concerned that emissions of nitrogen oxides (NO_x) from the nearby Irvington Generating Station contribute to elevated levels of ozone in Saguaro National Park, and that increases in NO_x emissions from this power plant will exacerbate unhealthy levels of ozone in the Park.
- 4. As Chapter Director, I am responsible for advocating for environmental protection with various state and federal agencies, conducting research, developing and evaluating policies, conducting grassroots outreach and organizing, developing and implementing priority projects, fundraising and budget development, and supervising staff, among others.
- 5. The Sierra Club is a national non-profit environmental organization founded in 1892. Its headquarters is located at 2101 Webster St. Suite 1300, Oakland, CA 94612. The Grand Canyon Chapter office of the Sierra Club is located at 514 W. Roosevelt St., Phoenix, AZ 85003.
- 6. Sierra Club has more than 780,000 members nationwide, including more than 15,700 in the state of Arizona. About 5,000 members live in Tucson, Arizona.

- 7. Sierra Club's purposes are to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth's ecosystems and resources; to educate and enlist humanity in the protection and restoration of the quality of the natural and human environment; and to use all lawful means to carry out these objectives. We pursue these objectives nationwide.
- 8. Sierra Club has members, including myself, who live, work, or recreate in the City of Tucson, Arizona, and who live, work, and recreate near the Tucson Electric Power ("TEP") Irvington Generating Station located at 3950 East Irvington Road in Tucson, Arizona.
- 9. Sierra Club members, including myself, are negatively impacted by air pollution from the Irvington Generating Station.

In accordance with the provisions of 28 United States Code § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED: September 7, 2018

Sandra Bahr