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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO
ALBUQUERQUE DIVISION**

WILD WATERSHED, MULTIPLE CHEMICAL SENSITIVITIES TASK FORCE, Dr. ANN MCCAMPBELL, M.D., and JAN BOYER,

Plaintiffs,

vs.

SANFORD HURLOCKER, District Ranger, Santa Fe National Forest, JAMES MELONAS, Supervisor, Santa Fe National Forest, CAL JOYNER, Southwest Regional Forester, U.S. Forest Service, and VICTORIA CHRISTIANSEN, Chief of the U.S. Forest Service, an agency of the U.S. Dept. of Agriculture,
Defendants.

6:18-cv-00486

DECLARATION OF ANN MCCAMPBELL, M.D.

I, Ann McCampbell, MD, pursuant to 28 U.S.C. §1746, declare under penalty of perjury that the following is true and correct to the best of my knowledge, and if called to testify I would attest to the following:

1. I am a physician and environmental health consultant residing in Santa Fe, New Mexico.
2. I was Chair of the Multiple Chemical Sensitivities Task Force of New Mexico (MCS Task Force) from 1997 to 2016, and since then have served as Co-Chair.
3. The MCS Task Force is a statewide advocacy organization comprised of chemically sensitive New Mexicans and supporters. The organization is dedicated to increasing awareness of Multiple Chemical Sensitivities and educating others about the hazards of high and low level chemical exposures.
4. Multiple Chemical Sensitivities is a medical condition recognized as a potentially disabling condition by the Social Security Administration and the U.S Dept. of Housing and Urban Development. It is also covered under the American with Disabilities Act. See: <http://annmc-campbell.com/wp-content/uploads/2012/01/mcsbro.pdf>
5. Multiple Chemical Sensitivities is a medical condition characterized by debilitating chemical sensitivities. For chemically sensitive people, exposures to even small amounts of toxic compounds in the air can produce a range of mild to life-threatening symptoms, including headache, nausea, fatigue, respiratory distress, irregular heartbeat, and seizures. Ibid.
6. Individuals with chemical sensitivities are also at higher risk of harm from wildfire smoke. In 1997, the NM Department of Health estimated that **16%** of adults in NM had chemical sensitivities and **2%** had been diagnosed with multiple chemical sensitivities. Voorhees R., Dep.

State Epidemiologist, Letter to Joe Thompson, (March 18, 1998), Special Counsel, Office of the Governor, New Mexico.

7. A more recent U.S. prevalence study of multiple chemical sensitivities was published in 2018. It showed that compared to a similar study done 10 years ago, the prevalence of those reporting chemical sensitivity has doubled (from 11.2% to 25.9%), and the prevalence of those reporting medically diagnosed MCS has more than tripled (from 2.5% to 12.8%). *Steinemann, A.* 2018. "National Prevalence and Effects of Multiple Chemical Sensitivities."¹
8. From 2005-2009 I was the Coordinator for the Coalition for Mercury-Free NM and in 2006 was a member of the NM Mercury Reduction Task Force convened by the NM Departments of Health and Environment.
9. In 2010, I served as a member of the Smoke Management Program Working Team convened by the NM Environment Department Air Quality Bureau to revise state burning regulations.
10. I have filed timely comments raising the concerns over the potential harms to human health posed by a prescribed burning program in the Santa Fe National Forest in relation to the Hyde Park and related forest treatment projects in 2005/2006, on behalf the MCS Task Force, and in 2009 and 2017 in my individual capacity.
11. According to the Montana Wildfire Event Action Plan, the "combustion of forest fuels from wildland fire results in the emission of hundreds, if not thousands of chemical compounds into the atmosphere in the form of smoke." See: [www.deq.state.mt.us/Air Quality/Planning/fire_plan/doc.asp](http://www.deq.state.mt.us/AirQuality/Planning/fire_plan/doc.asp)

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[J Occup Environ Med.](#) 2018 Mar; 60(3):e152-e156. doi: 10.1097/JOM.0000000000001272

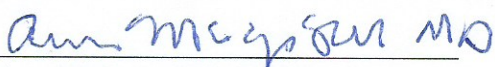
12. Smoke is made up of small particles, gases and water vapor. Gases include carbon monoxide, carbon dioxide, nitrogen oxide, and irritant volatile organic compounds (excerpted from: NM Fire Info, Smoke Management).
13. According to the Center for Disease Control, smoke can injure your eyes, irritate your respiratory system, and exacerbate chronic heart and lung disease.
14. According to the Center for Disease Control, people who have chronic conditions like heart disease, chest pain, lung disease, or asthma, are at higher risk from wildfire smoke than the average person who is not so afflicted. Older adults are more likely to be affected by smoke. Children are also more likely to be affected by health threats from smoke, since children's airways are still developing and they breathe more air per pound of body weight than adults.
15. Those most vulnerable to forest smoke include the young, the elderly, asthmatics, the chemically sensitive, pregnant women and individuals with cardiovascular disease. Not accounting for overlaps in these categories, the current total percentage of these vulnerable populations in New Mexico amounts to 80% of the general population, indicating that the adverse health effects from forest fire smoke has a disproportionately large impact on the majority of those exposed to it in this state.
16. From my own observations and experience as a physician consultant and from what I have learned through my work with the MCS Task Force, it is not uncommon for those with chemical sensitivities and/or asthma to have to barricade themselves in their houses or evacuate the area entirely when outdoor air is contaminated with smoke from unplanned or prescribed forest fires.

17. In 2004, I received numerous calls from chemically sensitive individuals who were made sick from smoke resulting from Forest Service burning in the Santa Fe Municipal Watershed. I have been advised by those familiar with forestry practices that the burning program being considered by the Forest Service and the Greater Santa Fe Fireshed Coalition will necessarily involve many more projects like those at issue here, and that each will require re-burn every 15-20 years, likely resulting in a program of annual prescribed burns in the vicinity of the Santa Fe Watershed. Since the proposed GSFFC program would involve even more extensive burning closer to populated areas than 2004's prescribed burn, it seems quite likely from my professional perspective that it will cause even more significant impacts on human health than I observed in 2004.

18. For most chemically sensitive individuals, it is more harmful and a hardship to be exposed to smoke from frequent and prolonged low intensity burning, such as that resulting from prescribed burns, than rare high intensity wildfires that would be expected in the project area. It is easier to evacuate for the duration of a rare natural fire than to evacuate repeatedly for prescribed fires. In my August 5, 2005 comments to the Forest Service, I suggested as a mitigation measure to burn the least number of days, that is, to burn in smaller time frames rather than burning on a continual intermittent schedule that offers little or no break from toxic smoke.

I swear that the foregoing is accurate and true to the best of my knowledge.

Dated this 27 day of August, 2018,


Ann McCampbell, M.D.