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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

NEWPORT FISHERMEN'S WIVES, INC., an Oregon nonprofit corporation, and LINCOLN COUNTY, a political subdivision of the State of Oregon, Plaintiffs, v. UNITED STATES COAST GUARD, an agency of the United States Department of Homeland Security, and KRISTI NOEM in her official capacity as the Secretary of Homeland Security, Defendants.	Case No. 6:25-cv-02165-AA **DECLARATION OF MAYOR JAN KAPLAN IN SUPPORT OF BRIEF OF *AMICUS CURIAE* CITY OF NEWPORT** Consolidated with: *State of Oregon v. Noem, et al.,* No. 6:25-cv-02172-AA

I, Jan Kaplan, declare under penalty of perjury as follows:

1. I am the Mayor of the City of Newport. I make this declaration based on personal knowledge.

2. Newport's coastal location and rugged terrain make Newport unique. Our landscape inspires residents, draws in tourists, and supports the commercial fishing industry and numerous sectors of the local economy.

3. Newport's unique location and terrain also underscore the community's need for a rescue helicopter, which residents and visitors alike depend on for safety and security.

Newport's Local Identity, Economy, and Culture

4. Newport is home to Oregon's largest commercial fishing port. While Newport is fondly referred to as the "Dungeness Crab Capital of the World," commercial and recreational fishing occur year-round and for a number of species. Because of the Pacific Ocean's conditions, much of that fishing occurs in dangerous circumstances, including chilling ocean water conditions, treacherous waves, high winds, and rain.

5. Our community depends on the jobs generated by the fishing industry in Newport. Many families in Newport depend on the income generated by a loved one's work on a vessel and the numerous jobs that flow "downstream" from the industry. Our processing plants, marine supply stores, ship makers, mechanics, grocery stores, and restaurants all rely on revenue stemming from fish harvested off Newport's coast.

6. Tourism is a major sector of Newport's economy. Tourists visit Newport year-round to engage in recreation off the Pacific Coast, including fishing, surfing, hiking, and mountain biking.

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7. Newport's waterfront serves as an economic hub and a social space. With locally-owned shops, galleries, and restaurants, locals and visitors alike take part in the unique and coastally inspired storefronts.

8. Another popular tourist destination is Newport's working bayfront. The only of its kind in Oregon, visitors can see people catching fresh fish from the ocean and peer into processing plants where fish are received and handled.

9. The real-life impacts of tourism on our economy and culture cannot be understated. Visitors support local jobs in the hospitality industry, restaurants (which serve locally harvested seafood), artists, and other small businesses. The wellbeing of Newport's residents and economy depend, in large part, on revenue received from tourism.

10. Newport also serves as a marine science hub, with research vessels and experts from National Oceanic and Atmospheric Administration (NOAA) and Hatfield Marine Science Center regularly taking to the sea off of Newport's coast to study whale and sea lion migrations along with other marine life. This work supports the Oregon Coast Aquarium, named as one of the top 10 aquariums in the country, and likewise brings in jobs that support our economy.

11. Newport's residents are drawn to Newport because of its location. People live in Newport because they want to be near the ocean. We engage in recreation on our beaches, hills, and in the water. We surf in the waters and eat the fish and crabs harvested here. We draw inspiration from the ocean. We raise our children to respect the water, sea life, and land.

Safety Implications and Related Effects

12. The United States Coast Guard's rescue helicopter is a critical safety net in Newport. Our unpredictable ocean conditions and rugged terrain make it necessary.

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13. The ocean can turn on a person in half a minute. It is not a matter of *if* the helicopter will be needed, but *when*, and whether or not it will arrive in time to save a life.

14. I am greatly concerned by the impacts that will be felt across our community due to the helicopter's absence.

15. Given that a city of our size cannot afford a rescue helicopter of its own, we have relied upon the Coast Guard's helicopter as a safeguard for decades.

16. Fishing in the Pacific Ocean, and off the Oregon coast in particular, is very dangerous. These risks are dramatically increased by the helicopter's absence. The decision to deprive Newport of this life-saving infrastructure is like removing seatbelts from a vehicle—it is both hazardous and ill-advised.

17. The departure of the Coast Guard's helicopter from Newport directly undercuts the safety of our visitors, residents, and fishers. I have personally seen the helicopter rescuing individuals out of riptides on many occasions.

18. In addition to the direct dangers heightened by the helicopter's absence, our community and local economy will feel an indirect impact. Tourists, residents, and fishermen partaking in the ocean could previously take comfort in knowing that the helicopter served as a safeguard if they needed it. Now, they may choose to visit or work elsewhere, nearer to a rescue helicopter's location.

19. Our community and businesses rely heavily on the income brought to Newport through fishing and tourism. I fear we could feel an economic ripple effect across our local economy, including in the hospitality industry, ship makers and mechanics, restaurants, locally-owned businesses, and artists. The effect on tourism—our bread and butter—and the local job market could be incredible.

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20. I am also concerned about the emotional strain the helicopter's absence is putting on our community. Our residents recognize its importance and have expressed concerns for their own security without the rescue helicopter's near-immediate availability.

Coast Guard City Designation

21. More than twenty years ago, on March 28, 2005, Newport was recognized as a "Coast Guard City." The Coast Guard City Program awards this special designation to communities that display extraordinary support to their local Coast Guard units. Newport was the fifth city nationwide to obtain this designation and the first in Oregon. We have long recognized the Coast Guard as part of our community and have taken great pride in this special designation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 11/25/2025 day of 11/25/2025.

By: _____
Mayor Jan Kaplan

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