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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
(Eugene Division)

NEWPORT FISHERMEN'S WIVES, INC.,
an Oregon nonprofit corporation, **CITY OF
NEWPORT, LINCOLN COUNTY, PORT
OF NEWPORT** and **MIDWATER
TRAWLERS COOPERATIVE**, an Oregon
cooperative,

Plaintiffs,

v.

UNITED STATES COAST GUARD, an
agency of the United States Department of
Homeland Security,

Defendant.

Case No. 6:14-cv-1890-MC

**SUPPLEMENTAL DECLARATION OF
GINNY GOBLIRSCH IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

I, Ginny Goblirsch, being sworn, say:

1. This supplemental declaration is based upon my own personal knowledge.

Because of my keen interest in the maintenance of the Coast Guard's rescue helicopter in

Newport, I have followed developments related to the Coast Guard's budget over the last several years.

2. When the Coast Guard first raised the possibility of closing its Newport Air Station in testimony before Congress in March 2013, the Oregon congressional delegation followed up. As noted in the letter dated October 8, 2014 that is attached as Exhibit A, multiple members of Oregon's congressional delegation were told by the Coast Guard in April 2014 that the Newport Air Station "would remain open through 2015," which would have given our delegation and our community adequate time to address the proposed closure through Congressional action either to ensure adequate funding to keep the station open or to make other adjustments to ensure timely SAR coverage for cold water emergencies. It was then a complete surprise to receive the notice from Rear Admiral R.T. Gromlich on October 2, 2014 that the Coast Guard had decided to close the Newport Air Station. The attached October 8 letter notes that the Coast Guard's unilateral decision to close the facility in December 2014 is inconsistent with the prior commitment to keep it open at least through 2015 and was made "without consulting the fleet, the community, or any local stakeholders."

3. I attended the stakeholders meeting organized by the City of Newport and the Port of Newport on October 15, 2014 held in Newport. At that meeting, the Coast Guard was represented by U.S. Sector North Bend Commander Todd Trimpert. In his opening remarks, Commander Trimpert stated explicitly that "a final decision had been made" and that the Coast Guard would not consider reversing that decision.

4. I also attended the community meeting at the Oregon Coast Community College in Newport on October 20, 2014. At this meeting, Rear Admiral Gromlich made the following

statement: "The decision to close the air facility in Newport, Oregon, as well as Charleston, South Carolina, was actually part of a budget submission for fiscal year 2014." This quote was carried the next day in the Coos Bay newspaper The World. Rear Admiral Gromlich was adamant during the course of that meeting that the decision was final and would not be reversed. A copy of the article from The World is attached as Exhibit B.

5. Within one week after learning of the Coast Guard's closure decision in the October 2 letter from Rear Admiral Gromlich, Michael Bateman forwarded a public records request to the Coast Guard requesting all documents pertaining to the decision to close the Newport Air Station. I have been in regular contact with Mr. Bateman regarding any Coast Guard response to that public records request. To date, no documents or response of any kind has been received from the Coast Guard. A copy of Mr. Bateman's request under the Freedom of Information Act is attached as Exhibit C.

6. I have reviewed the declaration of Coast Guard Captain Christopher A. Martino and wish to make two points in response. First, despite access to significant research showing that the Coast Guard's national standard of two hours for search and rescue (SAR) response is inadequate in cold water areas, the agency has done nothing to address the issue. The 1993 review of SAR program standards by the Chief of the Office of Navigation Safety noted:

There is still much work to do . . . One factor to be used would be the SAR Response Standard(s) for the area and season, as appropriate, versus an array of various response asset (cutter, boat, aircraft, etc.) capabilities. In areas with large seasonal variations in water temperature, this analysis should also assist us in assessing the costs and practicality of designing for worst case (lowest temperature situations), using additional seasonal response assets, and/or applying additional safety regulations (e.g., mandatory wearing of survival suits).

Martino Decl., Ex. 1 (Document 19-1) at 3-4.

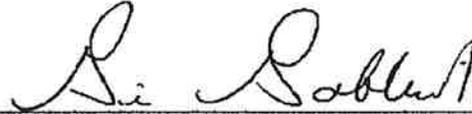
7. The two-page SAR Standards Review that was performed in 2000, Martino Decl., Ex. 1 (Document 19-1) at 1-2, also failed to examine the science regarding survival windows in cold water rescue situations and failed to address the factors quoted above in the 1993 review. I believe strongly that the Coast Guard, before it decommissions the Newport rescue helicopter, should systematically assess the relevant science and reexamine the assumptions underlying the two-hour, one-size-fits-all national SAR standard. It is a standard that simply does not work in the real world ocean waters along Oregon's coast. I would hope that the agency would rigorously assess these issues in the development of the action alternatives that would be analyzed in the environmental assessment or environmental impact statement that should accompany any consideration of whether decommissioning the Newport Air Station is appropriate.

8. Second, Captain Martino states in paragraph 17 of his declaration that there were only 47 SAR cases in a nearly five-year time frame that involved only the Newport rescue helicopter. This is a misleading statistic because, based on my observations, when the Newport helicopter is launched, it is almost always the case that one or more Coast Guard motor lifeboats also respond. The Coast Guard always provides back up for its personnel and equipment when on a rescue mission. In addition, Captain Martino's statistic is inconsistent with an October 13, 2014 email from North Bend Commander Todd Trimpert in which he reports that the data regarding the Newport rescue helicopter showed an average of 30-40 cases per year (factoring out false alarms) with a minimum of two cases per month. This statistic much more accurately reflects the significant life-saving service that the helicopter has performed over the last five

years, a response rate that has only grown over the 27 years that the rescue helicopter has been on station in Newport. A copy of Commander Trimpert's email is attached as Exhibit D.

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

DATED this 9 day of December, 2014.



Ginny Goblirsch

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December, 2014, I served the foregoing
**SUPPLEMENTAL DECLARATION OF GINNY GOBLIRSCH IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**, on the following:

Sean C. Duffy
United States Department of Justice
Environment & Natural Resources Division
Natural Resources Section
P.O. Box 7611, Ben Franklin Station
Washington, D.C. 20044-7611

by the following indicated method(s):

- by **mail** with the United States Post Office at Portland, Oregon in a sealed first-class postage prepaid envelope.
- by **email**.
- by **hand delivery**.
- by overnight mail.
- by **facsimile**.
- by the court's Cm/ECF system.

/s/Michael E. Haglund
Michael E. Haglund