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9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

11 THE KLAMATH TRIBES, a federally
12 recognized Indian Tribe,

13 Plaintiff,

14 vs.

15 UNITED STATES BUREAU OF
16 RECLAMATION; UNITED STATES FISH &
17 WILDLIFE SERVICE; NATIONAL MARINE
18 FISHERIES SERVICE,

Defendants,

19 and

20 KLAMATH WATER USERS ASSOCIATION,
21 SUNNYSIDE IRRIGATION DISTRICT, and
22 BEN DuVAL,

Defendant-Intervenors.

Case No: 3:18-cv-03078-WHO
[Related Case Nos. 3:16-cv-06863-WHO and
3:18-cv-03078-WHO]

**DECLARATION OF KELLEY MINTY
MORRIS IN SUPPORT OF AMICUS
CURIAE COUNTY OF SISKIYOU,
COUNTY OF MODOC, KLAMATH
COUNTY, AND THE MODOC TRIBE IN
SUPPORT OF DEFENDANTS UNITED
STATES BUREAU OF RECLAMATION
ET AL. AND DEFENDANT-
INTERVENORS KLAMATH WATER
USERS ASSOCIATION ET AL.**

DECLARATION OF KELLEY MINTY MORRIS

I, Kelley Minty Morris, declare as follows:

1. I was elected Klamath County Commissioner, Position 2. Unless otherwise stated, I have personal knowledge of the facts stated herein.

2. The Klamath Irrigation Project is home to nearly 200,000 acres of irrigable farm land. Klamath County contains a large portion of the Klamath Project which straddles the Oregon/California border in Oregon’s Klamath County and California’s Siskiyou and Modoc Counties.¹

3. The total direct, indirect and induced² value of agricultural production in Klamath County exceeds \$550 million annually, and provides direct and indirect benefits to Klamath County. *See*, Exhibit A, Klamath 2007 Aggregated Model. This figure may not represent the actual value of irrigated pasture associated with livestock production.

4. Klamath County receives direct benefits from agricultural production, including but not limited to, property tax revenue. In 2017, irrigable land produced approximately \$3.5 million in property tax revenues. Crops grown in Klamath County include, but are not limited to, cereal grains, alfalfa hay, onions, sugar beets and potatoes. If water deliveries are curtailed or halted, some or all of the current crops will be lost or severely damaged, significantly reducing land values. Additionally, water delivery shut off would likely result in loan default and foreclosure of properties.

5. Klamath County will experience severe economic impacts if the Court issues an injunction limiting water deliveries because it is likely many landowners will not be able to pay their property tax assessments. Less property tax revenue in turn means Klamath County has less disposable income which equals less services provided.

¹ It is worth noting that the jurisdiction which comprises the U.S. District Court for the Northern District of California does not include Klamath County, Siskiyou County or Modoc County. Klamath County is situated in the State of Oregon; Siskiyou County and Modoc County are located within the Eastern District of California’s jurisdiction. Venue is improper.

² Induced effects reflect the change in household personal consumption expenditures due to direct and indirect changes.

EXHIBIT A

14-Sep-09
 Total Value Added Multipliers
 Klamath 2007 Aggregated Model 091409.rpt
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	Direct Effects	Indirect Effects	Induced Effects	Type I Multiplier*	Type SAM Multiplier**	
1 Agriculture	0.34191	0.206563	0.103784	0.652258	1.604144	1.907687
15 Logging & Forest Products	0.574303	0.20947	0.104927	0.8887	1.364737	1.547441
30 Mining	0.753807	0.072464	0.294267	1.120538	1.09613	1.486504
31 Utilities	0.656212	0.067534	0.139734	0.86348	1.102914	1.315854
33 Construction	0.370096	0.189498	0.170265	0.72986	1.512025	1.97208
46 Manufacturing Food	0.083059	0.302429	0.100914	0.486401	4.641137	5.856106
95 Manufacturing Wood Products	0.371982	0.266104	0.146982	0.785068	1.715366	2.110497
113 Manufacturing All Other	0.297761	0.142241	0.122239	0.562241	1.477701	1.888226
132 Manufacturing High Tech	0.193935	0.202228	0.108337	0.5045	2.042758	2.601385
319 Wholesale Trade	0.625915	0.152562	0.239662	1.018139	1.243742	1.626641
320 Retail Trade	0.688154	0.131076	0.264523	1.083754	1.190475	1.57487
335 Transportation & Warehousing	0.456818	0.183746	0.166769	0.807333	1.402231	1.767297
341 Information	0.434171	0.183044	0.152844	0.770059	1.421594	1.773631
360 Real estate & rental	0.691818	0.114985	0.095038	0.901841	1.166207	1.303581
366 Finance & insurance	0.421823	0.16735	0.173653	0.762826	1.396731	1.808403
367 Other services	0.500627	0.186209	0.207865	0.894702	1.371952	1.787161
369 Professional- scientific & tech svcs	0.564629	0.165803	0.256154	0.986586	1.293649	1.747316
381 Management of companies	0.492507	0.19019	0.198161	0.880858	1.386168	1.788521
390 Administrative & waste services	0.423079	0.211465	0.178275	0.812819	1.499824	1.9212
391 Educational svcs private	0.480405	0.20399	0.203254	0.887649	1.424622	1.847711
394 Health & social services	0.562426	0.162565	0.226004	0.950995	1.289043	1.690881
402 Arts- entertainment & recreation	0.562582	0.188358	0.2232591	0.983532	1.33481	1.748246
411 Accommodation & food services	0.482301	0.19114	0.190332	0.863773	1.396308	1.790942
427 Government	0.90627	0.032149	0.292272	1.230691	1.035474	1.357974
428 Non- NAICS	0.316697	0.144661	0.21136	0.672719	1.456781	2.124169

EXHIBIT A

14-Sep-09

Employment Multipliers
 Klamath 2007 Aggregated Model 091409.iap
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	Direct Effects [^]	Indirect Effects [^]	Induced Effects [^]	Type I Multiplier*	Type SAM Multiplier**
1 Agriculture	9,061,581	3,798,558	2,017,422	14,877,561	1,419,194
15 Logging & Forest Products	2,518,266	1,913,745	2,062,341	6,494,346	1,759,947
30 Mining	15,480,717	1,255,898	5,887,414	22,624,028	1,081,127
31 Utilities	1,310,994	1,249,441	2,680,877	5,241,312	1,953,048
33 Construction	8,079,634	3,647,581	3,393,846	15,121,061	1,451,454
46 Manufacturing Food	2,291,882	5,635,086	1,995,019	9,921,987	3,458,715
95 Manufacturing Wood Products	4,034,544	3,230,101	2,919,964	10,184,605	1,800,612
113 Manufacturing All Other	5,350,669	2,335,888	2,439,245	10,125,793	1,436,558
132 Manufacturing High Tech	2,147,838	3,360,592	2,157,195	7,665,625	2,564,664
319 Wholesale Trade	8,280,354	2,847,053	4,645,826	15,773,233	1,343,832
320 Retail trade	17,808,958	2,247,25	5,127,894	25,184,102	1,126,186
335 Transportation & Warehousing	5,636,661	3,409,576	3,315,692	12,361,929	1,604,893
341 Information	5,893,812	3,732,205	3,011,991	12,638,009	1,633,241
360 Real estate & rental	2,275,7	1,840,946	1,769,346	5,885,992	1,808,958
366 Finance & insurance	8,202,561	3,434,649	3,466,888	15,104,199	1,418,729
367 Other services	16,745,033	3,759,279	4,126,589	24,630,901	1,224,501
369 Professional- scientific & tech svcs	8,749,516	3,462,755	5,128,298	17,340,569	1,395,765
381 Management of companies	5,640,171	4,346,509	3,956,55	13,943,23	1,770,634
390 Administrative & waste services	6,079,555	4,113,577	3,509,653	13,702,785	1,676,625
391 Educational svcs private	28,966,209	2,924,154	4,050,527	35,940,89	1,100,95
394 Health & social services	14,270,333	2,848,453	4,515,705	21,634,491	1,199,607
402 Arts- entertainment & recreation	26,717,197	4,136,223	4,595,998	35,449,418	1,154,815
411 Accommodation & food services	18,481,771	3,305,67	3,740,995	25,528,036	1,178,861
427 Government	15,049,562	0,571,169	5,871,294	21,492,024	1,037,953
428 Non- NAICS	7,574,628	2,459,176	4,234,834	14,268,638	1,324,66