

THE HONORABLE THOMAS S. ZILLY

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CITIZENS OF EBEBY'S RESERVE FOR A  
HEALTHY, SAFE & PEACEFUL  
ENVIRONMENT,

Plaintiffs,

v.

U.S. DEPARTMENT OF THE NAVY  
ADMIRAL BILL GORTNEY, in his official  
capacity as the Commander, Fleet Forces  
Command and COMMANDER MIKE  
NORTIER, in his official capacity as  
Commander Naval Air Station Whidbey  
Island,

Federal Defendants.

NO. 2:13 cv 01232 TSZ

DECLARATION OF JANICE  
PICKARD

I, JANICE PICKARD, declare as follows:

1. I am over the age of 18 and competent to testify in this matter. The information in this declaration is based on my personal belief.

2. I was born here in Coupeville in 1946. My grandparents came here to Whidbey Island in 1921, I am a third generation islander. I am a mental health therapist, and have practiced here in Coupeville for over 20 years. I serve on a number of Boards as

1 well, including the Ebey's Landing National Historical Trust Board, Friends of Ebey's, the  
2 Country Mental Health and Substance Abuse Advisory Board, and CADA ( Citizens  
3 Against Domestic Violence and Sexual Assault ).

4 3. I have sought medical care for anxiety brought about by Growler touch and  
5 go training at the OLF Coupeville field. The anxiety which has evolved into a state of  
6 trauma, includes not only the actual touch and go exercises, but also my anticipation of  
7 them. I have also been treated for high blood pressure, which I believe was brought on as a  
8 result of the anxiety and trauma.  
9

10 4. Based on my experience and observation I believe that digestive problems  
11 that I experience have been exacerbated by the noise from the Growlers flying over my  
12 home. I also have Diabetes, which I believe is exacerbated by exposure to the noise.  
13 When I intentionally remove myself from my home for extended lengths of time, my  
14 glucose levels improve.  
15

16 5. My sleep patters are completely disrupted when the jets fly.

17 6. I have Tinnitus that I attribute to exposure.

18 7. Exposure to touch and go jet training has become a dominant  
19 mental/emotional focus and is degrading the quality of my life. The rumbling, and ear  
20 splitting noise causes ones internal organs to shake. I will need to move away from this  
21 most treasured place if the jets don't find an alternative place to practice.  
22

23 8. During a therapy session, my client , a Vietnam War Veteran suffering from  
24 PTSD, was frightened so badly by a jet going 200 feet over my home, that he ran from the  
25 session and fled in his car. I constantly have to reschedule clients, and often that doesn't  
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DECLARATION OF JANICE PICKARD  
(NO. 2:13 cv 01232 TSZ) 2

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1 work because the Navy often doesn't stick to its published schedule, making it very difficult  
2 to practice my work.

3 9. I believe that it is inhumane to expose our community to such violence. The  
4 military is reputed to be our protector. In fact they consider our town, our designation as a  
5 National historical Reserve, our citizens, and the Reserves wildlife, pets and commercially  
6 raised livestock to be Collateral Damage. Because there are alternative locations for such  
7 training I believe their intentionally imposing this trauma on us is criminal.  
8

9 10. It saddens my heart and alters my life in ways I could never have imagined  
10 to believe that in my America this can be allowed to occur.

11 I declare under penalty of perjury under the laws of the State of Washington that  
12 the foregoing is true and correct.

13 Dated this 15<sup>th</sup> day of March, 2015, in Coupeville, Washington.

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16 By: Janice Pickard  
17 Janice Pickard  
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