

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 KATLAINA
RAYNE

I, Katlaina Rayne, 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. My name is Katlaina Rayne. I am 70 years old and have lived on Whidbey Island for 14 years, and in Coupeville for 11 years. My father has lived in Coupeville for about 40 years. In the late '70's he built a house on about 5 acres that he inherited from his

1 mother. My grandmother had inherited it from her father. This property, which is on SR
2 20 about 2 miles north of the OLF, has been in the family for over 100 years. My father,
3 age 94, moved into an assisted living situation 3 years ago, and my husband and I moved
4 into his house as caretakers about a year ago.

5 3. I grew up in a military oriented family. My father served in WWII, and
6 again in the Korean War in the Air Force reserves. My father loves aircraft. It was his
7 dream to be a pilot, but poor eyesight limited him to starting out as a mechanic. He retired
8 from the Air Force as a Master Sargent and went to work for the Federal Government as a
9 Production Specialist overseeing contracts between the Air Force and Boeing. He retired
10 as a GS 13, and moved to Whidbey. A highlight of my childhood summers was watching
11 the Blue Angels during Seafair.
12

13 4. I am a Licensed Mental Health Counselor, and have been in practice over
14 25 years. I have had a successful practice her on the Island for 14 years.
15

16 5. When we moved to Coupeville 11 years ago we were aware of the jet
17 activity at OLF and noise that was generated by it. We considered it a minor annoyance.
18 The arrival of the Growlers lifted it to another level. We moved into my father's house
19 because he needed us to, but find that it is impossible to live under the Growlers. We are
20 right in their flight path. Sometimes it seems they are just a little above the treetops behind
21 the house, they are very low.
22

23 6. I have developed Tinnitus, even though we are diligent about wearing ear
24 protection when they fly. It seem preposterous to me that American citizens should be
25 required to wear industrial strength ear protection in their homes, as well as being unable
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DECLARATION OF KATLAINA RAYNE
(NO. 2:13 cv 01232 TSZ) 2

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1 to carry on a phone conversation, watch TV, talk to each other, or have workmen over. I
2 actually had a workmen leave when the jets started flying.

3 7. I find that my blood pressure rises significantly when they are flying, and
4 stays elevated for a day or 2 after. I happened to have a doctors appointment last summer
5 the day after they had been flying most of the day and into the late night, and was shocked
6 to find my blood pressure reading about 50 points higher than normal. I have never had
7 blood pressure issues before.

8 9. Most troubling to me is that the deep, penetrating vibration the Growlers
10 emanate causes me to be very anxious and distracted. I can't concentrate when they've
11 been flying. I get a headache and feel nauseous. It is impossible to sleep when they are
12 flying into the late night hours, and this affects my ability to be an effective therapist for
13 my clients.

14 10. I find that I seem to have developed a traumatic response to their flights. I
15 feel very anxious each week when I check to see if they will be flying, and am so relieved
16 when I find they won't be. If I find that they will be flying I'm very anxious in
17 anticipation of it. And I can't help but feeling very panicked when they do fly, even
18 though my mind knows that it will stop at some point. The vibrations shake the body so
19 deeply one can't help feeling panicked.

20 11. It doesn't make sense to me that the health of so many people should be
21 compromised because the Navy prefers the OLF to other practice sites.

22 12. My husband and I will not be able to live here if the Growlers continue to
23 fly, and it is very sad to me that we will be forced to sell a property that has been in our
24 family for over 100 years. This is my inheritance, and the basis of my retirement, and if
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1 we are forced to sell it will be at a very steep discount. Not a lot of people want to live
2 with this kind of stress. I believe that our health is being damaged by the kind of intense
3 noise the Growlers generate. In addition, we have the additional stress of having our
4 financial security significantly diminished.

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

7 Dated this 15th day of March, 2015, in Coupeville, Washington.

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10 By: Katlaina Rayne
11 Katlaina Rayne