

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 GERALD A.
ROBERTS

I, Gerald A. Roberts, 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 am seventy years old. In January of 2015 I will have been married to my wife Norma Roberts for thirty-five years. Norma and I have raised and are very proud of our

1 four children all of whom are college graduates with established careers. Our six
2 grandchildren are a source of constant joy and pride.

3 3. From an early age I have been gifted with artistic abilities. My career path
4 has been in the fields of fine art, painting, architectural design and related disciplines. In
5 1979 Norma and I started our design and consulting business in Everett, WA and ran it
6 successfully until 2000 when I nearly died from a newly acquired auto immune disease
7 diagnosed as Crohns. During the pre---diagnosis period of time I was deathly ill and unable
8 to work in our business for nearly two years. I was flat on my back near death. My weight
9 went from approximately 160 lbs. to 115lbs. The medical bills and ongoing living
10 expenses wiped out our savings and retirement funds. To this day I have not been able to re-
11 --launch my business because any stress exacerbates the intensity and frequency of my
12 Crohn's flare ups. Norma tried continuing the business while taking care of me until my
13 care became a full time job. Around 2004 I was able to return to painting part time with
14 some success and national recognition. When physically able I enjoy fishing and
15 sightseeing.

16 4. We built our home at 550 Crockett Lake Drive Coupeville, WA 98239 in
17 1994. We live about one mile from OLF Coupeville in a large residential subdivision known
18 as Crockett Lake Estates, hundreds of homes on residential lots. We were aware of the
19 Navy Prowler (predecessor to the Growlers) flights at the OLF and found them to be
20 tolerable except for the flying late at night and on hot summer days when we had our
21 windows open. There is no question whatsoever that the Growler noise and frequency is
22 substantially louder and more impacting on my health than the prior Prowler noise
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1 5. When the Growlers fly their typical pattern at OLF Coupeville we are in the
2 geographic center of the flight pattern. The relentless and incredibly loud noise (100+
3 decibels) from the jets results in increased anxiety, anger and stress causing my Crohns to
4 flare. These flares have been pretty much non---stop since the introduction of the Growlers at
5 OLF. I have developed an increasing number of anger issues which did not occur with near
6 the frequency and intensity prior to the introduction of the Growlers. In the last few years I
7 have also developed constant Tinnitus and when the Growlers are active I have developed
8 even more noticeable ear ringing, discomfort, earaches and headaches.

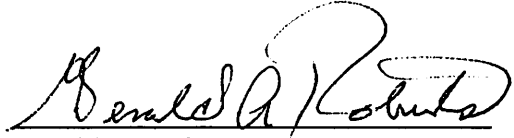
10 6. Crohns Disease makes it virtually impossible to maintain any moderate or
11 long term commitments. When my Crohns disease is flaring the symptoms can be anything
12 from moderate abdominal pain to diarrhea to severe intestinal pains and explosive diarrhea
13 all accompanied with excessive gas. My flares can last from days to months and vary in
14 intensity. Crohns is an autoimmune disease that causes my immune system to identify my
15 intestinal tract as foreign. It then attempts to eliminate my intestines as foreign invaders. I
16 have also suffered from severe pain and mobility problems caused by arthritis (known as
17 Crohns Related Arthritis) that affects my fingers, wrists, hips, shoulders, knees and ankles.
18 In the past the disease took me literally to my death bed for nearly eighteen months in the
19 early 2000s. I have zero desire to return to that state again. The disease has caused me
20 dramatic weight loss, colon bleeding, anemia, intestinal blockage and an abscess requiring
21 two surgeries to save my life. Presently the Growler jet noise upsets me to the point of
22 increased diarrhea, abdominal pains, anxiety, anger and the dread of the repeating of my
23 earlier more severe symptoms.
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7. Today, I find myself with deteriorating health and emotional distress mostly related to the Growler jet noise. At this time I am having a moderate flare just anticipating when they will fly again. With the advent of the Growlers our life here has become unbearable causing us to contemplate selling our home, which we love, and moving to a location that doesn't make me feel as though I live in an active war zone. I am sure we will not be able to get the true value for our home due to the stigma of the Growler over flight. As self employed business owners, parents and artists, we have faced numerous challenges in our lives with notable success. That is until the U.S. Navy introduced the Growlers to our peaceful living environment. The Navy has made our lives a living hell.

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

Dated this 28 day of MARCH 2015, in Coupeville, Washington.

By: 
Gerald A. Roberts