THE HONORABLE THOMAS S. ZILLY 1 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 CITIZENS OF EBEY'S RESERVE FOR A HEALTHY, SAFE & PEACEFUL 10 ENVIRONMENT, NO. 2:13-cv-01232-TSZ 11 Plaintiffs, 12 DECLARATION OF DANIEL L. V. 13 SCHURR U.S. DEPARTMENT OF THE NAVY; 14 ADMIRAL BILL GORTNEY, in his official 15 capacity as the Commander, Fleet Forces Command; and COMMANDER MIKE 16 NORTIER, in his official capacity as Commander Naval Air Station Whidbey 17 Island, 18 Federal Defendants. 19 20 I, DANIEL L. SCHURR, declare as follows: 21 I am over the age of 18 and competent to testify in this matter. The 1. 22 information in this declaration is based on my personal belief. 23 2. I am 59 years of age. I am married and live one quarter of a mile from OLF 24 25 Coupeville, at 1137 Dewey Drive Coupeville, WA 98239. The noise study conducted by 26 COER's acoustic engineering consultant, JGL Acoustics, puts the noise in my residential 27 28 **GENDLER & MANN. LLP**

DECLARATION OF DANIEL L. SCHURR (NO. 2:13-cv-01232-TSZ) - 1

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DECLARATION OF DANIEL L. SCHURR (NO. 2:13-cv-01232-TSZ) - 2

neighborhood at 110-134 decibels. The Growlers fly extremely low and directly over my house when they are conducting FCLPs at OLF Coupeville. I have lived at this residence for 22 years, having purchased in May of 1992.

- 3. My career has been in aviation and aerospace. I am a United States Navy Veteran. I served at NAS Whidbey between 1980 and 1984, active duty, and as a Reserve from 1984 to 1985. While in the Navy I was a jet engine fuel system mechanic. All the time I worked on jets for the Navy they supplied me with excellent hearing protection. I have been an FAA Private Pilot since 1977. I also have an FAA airframe and powerplant license to perform inspections, maintenance and repairs on airplanes.
- 4. I have a Bachelors Degree in Aviation Administration. I have worked at Boeing for 29 years as an industrial engineer. I have a Bachelor of Science degree from Central Washington University in accounting. I have studied and earned all of my college degrees while working full time. I enjoy helping people and have trained and mentored many industrial engineers. I support two children in Mexico. I support local charities.
- 5. I was diagnosed with depression/anxiety in 2001. Presently I suffer hearing loss, diabetes, sleep disorder and difficulty concentrating at Boeing where I work full time.
- 6. I believe that my diabetes, sleep disorder, i.e. inability to sleep due to extreme jet noise, and resulting difficulty of concentrating at work are directly caused by the Growler jet noise. The Growler noise causes me severe stress and exacerbates my depression and anxiety problem. Before I moved into this noise zone I did not have these conditions at all.
- 7. Some nights when the Growlers fly I only get 2 to 3 hours of sleep. I have to get up at 3:15 a.m. to make it to work which starts at 5 a.m. I have to commute in a van

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pool or on a bus because I'm too exhausted to drive after a long evening and night, sometimes until I a.m., of jet noise. When I have tried to drive my own vehicle I pass out from fatigue.

- 8. When the Growlers are training we cannot do ANY outdoor activities. No yard work, no walking, nothing can be done outdoors. We have to stay inside, close all the windows, even in the summer. It gets hot and uncomfortable inside. Our entire house shakes, the windows rattle and it is pure hell.
- 9. The Growler noise in intolerable. I have NEVER been exposed to noise at any time in my life anywhere near the volume and frequency of the Growler noise in my neighborhood and inside my house. It is unimaginable.

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

Dated this 23 day of Mach, 2015, in Coupeville, Washington.

By:

Daniel L. Schurr