

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 ROBERT  
WILBUR

I, Robert Wilbur, 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 wife and I moved to Whidbey Island in the summer of 2006 eight years ago. We live at 118 Keystone Avenue within the Admiral Cove neighborhood. Our home

1 is directly under the flight path approaching OLF Coupeville used by the EA18G Growlers  
2 for the flight carrier landing practice (FCLP) operations.

3 3. My wife and I chose to live on Whidbey Island to be close to our two sons  
4 and their families. We also were drawn to the natural beauty.

5 4. Although I retired in 2000, I continue to edit research manuscripts. I have a  
6 Master's degree in zoology (NC State), 9 years in fishery research, 9 years in salmon  
7 enhancement planning and marine regulatory work in Alaska, 27 years in the science  
8 editing arena, author of a variety of publications in the formal scientific literature.

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10 5. When we first moved to our property we were aware of the flight operations  
11 but had never experienced the noise created by the older EA-6B Prowlers; i.e., we were  
12 living in Virginia at the time of our purchase. When first experiencing the Prowler noise, it  
13 was distressing and wearing. By 2009, however, the new EA-18G Growlers were  
14 noticeably louder and the overall FCLP operation at OLF Coupeville increased greatly  
15 making the noise impacts horrific. The new jets are much louder on both approach and  
16 departures. Again, they fly directly overhead when they come in over Admirals Cove.  
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18 6. By early 2011 noticed I was having hearing issues. My initial audiogram  
19 was conducted about 2011 when Dr. Jarrell offered a free screening opportunity. The  
20 results were legal deafness at high pitched frequencies. When I discovered how damaging  
21 the jet noise was that we were being exposed to, I returned for a subsequent audiogram in  
22 2013. Dr Jarrell found the high-frequency deafness range had increased significantly, and  
23 she suspected, given the absence of other explanations, the exposure to jet noise outside  
24 my house was quite likely the cause. I have measured noise levels outside our home at  
25 over 120 dBA, and inside our home at over 95 dBA with doors & windows shut.  
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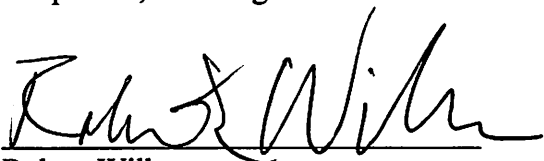
1           7.       In the 1980s I was diagnosed with atrial tachycardia and was treated with  
2 quinidine. Over subsequent years the dose level was gradually diminished as the symptoms  
3 diminished. Mild and very infrequent instances of tachycardia occurred but were of no  
4 concern. After the 2013 hiatus of FCLP practice at OLF Coupeville, operations started up  
5 again in early 2014, I found that instances and severity increased noticeably. I may have to  
6 go back on quinidine, albeit the drug is not without risks.

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8           8.       While I support proper training for our military, Whidbey Island, and  
9 especially OLF Coupeville is not a good fit for Growlers. There are so many other places  
10 that could be used without the devastating impacts on people the Navy is putatively  
11 protecting. We all know the Navy likes Whidbey Island and the status quo, and it is quite  
12 apparent that the Navy places that preference above the well-being of the island's citizens--  
13 because it is more powerful and can do as it pleases. This knowledge is extremely  
14 frustrating and foments anger that is especially exacerbated during FCLP sessions during  
15 which one a) cannot conduct business or personal phone conversation, b) cannot entertain  
16 inside or outside, c) needs to wear hearing protection inside and outside, d) cannot hear  
17 TV, e) should not get caught on a walk or jog without hearing protection, f) cannot  
18 converse with family at dinner, etc.

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

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

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26           By:

  
Robert Wilbur