THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CITIZENS OF EBEY'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 BRADLEY S. PORTIN

I, BRADLEY S. PORTIN, 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 Bradley S. Portin. I am 58 years of age. I am married. We have two residences, one at 1276 Byrd Drive, Coupeville, Washington where we reside part of the time and the remainder of the time we live at 1231 NE 135th Street, Unit D, Seattle,

DECLARATION OF BRADLEY S. PORTIN (NO. 2:13-cv-01232-TSZ) - 1

GENDLER & MANN, LLP 615 2nd Ave. Suite 560 Seattle, WA 98104 Phone: (206) 621-8868 Fax: (206) 621-0512 THE HONORABLE THOMAS'S PLLY

UNITED STATES PARTICOT COURT WESTERN DISTRICT OF WASHINGTON AT STATE

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WA 98125. Our home at Byrd Drive is approximately one mile from OLF Coupeville, and under the flight path of the EA18G Growlers on the predominant final approach to the OLF.

- 3. I am a life-long Washingtonian having grown up in Seattle. I graduated from the Shoreline Schools in Seattle, obtained my first degree from the University of Washington and Masters from Seattle Pacific University. I was an elementary teacher and principal before pursuing my Ph.D. at Oxford. I have been a professor at the University of Washington since 1995 and currently the dean of the School of Educational Studies at the University of Washington, Bothell.
- 4. We moved into our Whidbey Island residence in April of 2010. That began my exposure to Growler jet noise. Due to increased tinnitus, (constant ringing in my ears), in 2011 I was sent by my physician to an audiologist. I was diagnosed with permanent unilateral hearing loss and told I suffer tinnitus, both conditions for which there is no treatment available.
- 5. Other than my exposure to the tremendous noise of the Growler aircraft I have never been exposed to any extremely loud noise. There is nothing in my personal history and background that are usual explanations for the ear and hearing problems I am experiencing since we moved under the Growler/OLF flight path. I have never been exposed to loud music, have not attended loud concerts, fired guns nor hunted, been in the military, nor engaged in any activities to account for the type of hearing loss I suffer, other than exposure to the Growlers at very low altitude over our residence.
- 6. One event that stands out in my memory is when I inadvertently locked myself out on a second floor deck while the Growlers were practicing. I spent about an hour without ear protection while I sought a way to get off of that deck.

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- 7. The Growler overflights are loud beyond description. We feel trapped in our home where we must be when they are flying. The extreme noise is frightening to our pets. Conversations or listening to music or television cannot occur during flight training. When they fly until very late into the night, often until 1 a.m. sleep is prevented which impacts me the next day at work or leisure.
- 8. I am supportive of appropriate training for our military forces, but believe that appropriate training that is dangerous to others should be performed in appropriate locations. The OLF Coupeville is not such a place.

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

Dated this 16th day of March, 2015, in Coupeville, Washington.

By:

Bradley S. Portin

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