

THE HONORABLE THOMAS S. ZILLY

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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 JAMES  
DAHLGREN, M.D.

I, JAMES DAHLGREN, M.D, 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 knowledge and professional medical opinion.

2. I am a Diplomate of the American Board of Internal Medicine, Occupational and Environmental Medicine and Toxicology. I am familiar with the

1 serious and well document adverse health effects of noise. A true and correct copy of my  
2 current CV and list of publications is attached as Exhibit 1.

3 3. In preparing this declaration I have reviewed the 2013 Noise Measurements  
4 conducted by JGL Acoustics for COER. I have also reviewed the 2005 Environmental  
5 Assessment for Replacement of EA-6B Aircraft with EA-18G Aircraft at Naval Air Station  
6 Whidbey Island, Washington; the 2012 Environmental Assessment for Expeditionary  
7 Transition of EA-6B Prowler Squadrons to EA-18G Growler at Naval Air Station  
8 Whidbey Island, Washington; the 2005 AICUZ Study Update for Naval Air Station  
9 Whidbey Island's Ault Field and Outlying Landing Field Coupeville, Washington; the  
10 June 2, 2014 letter from Captain M.K. Nortier in response to Senator Maria Cantwell;  
11 Slide show on Community Aircraft Noise by S, Serrano, C Karr, N Beudet and K  
12 Bowman; and the declarations of thirteen subjects who live in Central Whidbey Island and  
13 are suffering adverse health effects caused by the noise from the Growlers landing and  
14 taking off.

15  
16  
17 4. In addition I have reviewed each of the scientific studies and scientific  
18 journal articles cited in my attached report and in the bibliography attached as Exhibit 2 to  
19 this declaration.

20  
21 5. By way of summary, it is my professional opinion that:

- 22 a. The noise from the Navy's Growler aircraft landing and taking off from  
23 Outlying Landing Field Coupeville (OLFC), Washington is causing and has  
24 caused serious adverse health effects in the residents as described in the  
25 thirteen declarations of residents living near the field. As predicted from  
26 hundreds of scientific studies of health effects from noise at the levels  
27

1 measured near the OLF Coupeville by JGL Acoustics in 2013, such levels  
2 of noise pressure are causing insomnia, anxiety, depression, impaired  
3 concentration, hearing loss, tinnitus (ringing in the ears), hypertension,  
4 worsening diabetes, gastrointestinal difficulties and a major decrement in  
5 quality of life. The residents are justifiably frightened by the noise. Loud  
6 noise stimulates a significant stress response and would normally create a  
7 fight or flight response. Unfortunately, these residents are trapped and have  
8 no place to go.

9  
10 b. The U.S. Navy's 2005 EA significantly underestimated the noise impact on  
11 public health due to field carrier landing practice ("FLCP") operations of  
12 the EA 18G Growler aircraft at Outlying Field ("OLF") Coupeville. It is  
13 irresponsible to ignore the body of scientific evidence that is well known (or  
14 should be well known) to the Navy and attempt to say there is no problem  
15 here.

16  
17 c. *Any* FLCP operations, much less existing operation levels, of the EA-18G  
18 Growler aircraft at OLF Coupeville will more likely than not result in  
19 irreparable injury to health for those citizens residing in proximity to OLF-  
20 Coupeville. The testimony of the thirteen residents already shows that the  
21 types and variety of adverse health effects that one would expect to see in  
22 residents who are exposed to the levels of noise set forth in the JGL  
23 Acoustics 2013 report have in fact occurred.

24  
25 d. I would expect that a rational decision-maker would want to have a  
26 thorough presentation of the health impacts of jet aircraft noise that would  
27

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

accompany continued FLCP operation by the EA-18 G aircraft at OLF-Coupeville before approving further operations there.

6. My opinions above are explained in detail supported in my attached report dated March 13, 2015 that I prepared for COER. A true and correct copy of that report is attached as Exhibit B.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated this 10 day of April 2015, in Sunnyvale, California.

By: James Dahlgren  
JAMES DAHLGREN, M.D.