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The Honorable Richard A. Jones

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON, CITIZENS
OF THE EBEBY'S RESERVE FOR A
HEALTHY, SAFE AND PEACEFUL
ENVIRONMENT; and
PAULA SPINA,

NO. 2:19-cv-01062-RAJ-JRC

Plaintiffs,

DECLARATION OF
[REDACTED]

v.

UNITED STATES DEPARTMENT OF
THE NAVY, et al.,

Defendants.

DECLARATION OF [REDACTED]

Pursuant to 28 U.S.C. § 1746 and under penalty of perjury, I, [REDACTED] 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.
2. I reside at [REDACTED], in Coupeville, Washington. I have lived in this home and community for fourteen years.
3. I lived in Connecticut for over 20 years before choosing Coupeville as my home in 2005. Coupeville, the second oldest town in Washington State, has been an example of a healthy, resilient and sustainable community, especially in recent years with a burgeoning agri-tourism and outdoor recreational tourism resurgence in Island County. I have been deeply engaged in making a lot of this happen.

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4. I am a member of COER. I am one of the original founders of COER, and have served on COER's board of directors going back to COER's founding in December 2012. I am the immediate past president of COER, continue to serve as a director, and am actively engaged in COER's mission.
5. Aside from my activities with COER, I have also been at the forefront of creating the local organic farm school, the Whidbey Island Grown Brand, am a Slow Food board member and engage my own business with the chefs and growers of Whidbey Island, and especially Central Whidbey. Revenues raised here, stay here to benefit the local economy.
6. Irrevocable harm is being done to the sustainability of my life trajectory as well as my Coupeville community's present and future health as well as all of the other natural and human resources of our environment that currently provide our community with resiliency. This harm is being caused by the severe noise impacts of the EA18G Growler, a direct result of the expansion of the number of jets and the increase in their number of operations over Coupeville and Northwest Washington.
7. My home is located near OLF Coupeville and pathway 32, one of the two flight tracks used by Growlers at the OLF, includes my home and property.
8. I had read the Navy's 2005 Environmental Assessment that said there would be fewer Growlers and that they would be quieter than the Prowlers (which I had heard) – so I looked forward to the transition. I received no warning during the purchase of my home regarding noise levels from military jets. Unfortunately, the sound profile of the Growler is more complex and has low frequency level as well as high frequency levels of noise that make Growlers sound and feel louder than the Prowlers. The Growlers are experienced as louder and instead of fewer jets (52), promised in the 2005 EA, the Navy now has decided to bring 118 Growlers to Whidbey Island.
9. COER's consultant acoustics expert, Jerry Lilly, recorded Growler noise at 83 decibels inside my house. Outside the noise varies from 100 decibels to about 120 decibels, depending on how directly over my house they are, how low they are flying, and if they need to engage afterburners to make the turn toward the west in their pattern.

- 1 10. On rainy days when the cloud cover is low, I often smell jet fuel in my home and
2 have smelled it under pathway 14 at the Transit Center, located a few miles from my
3 house.
- 4 11. The noise from Growlers flying overhead completely occupies and vibrates my
5 body, my home, my business, the landscape, airspace, and any living plant or animal
6 under the pathway of the Growler jets. They usually fly 3-4 jets at a time for 40 to
7 45 minutes straight and repeat such sessions multiple times in a 24 hour period of
8 time. The noise is constant for several hours at a time. During this time, if I have to
9 remain in my house, I wear earmuff protection to attenuate as much noise as I can,
10 knowing that my blood pressure rises with each passing jet. Because of the non-
11 auditory noise impacts, I try to leave my house while the jets are flying and often
12 sleep at a friend's house in Freeland.
- 13 12. I had been raising critically endangered Poitou donkeys since 2006 and had to re-
14 home them in March of this year (2019) after the Navy's Record of Decision
15 because I felt they would be injured outside without any way to protect them from
16 the increased amount of noise. I felt I had reason for concern because after the
17 Growlers arrived in 2009, I had a donkey miscarriage in 2012, exactly when the
18 Navy increased the number of FCLP trainings at OLF. Purchasing and caring for
19 these animals was a joy in my life. I spent \$11,000 to fence 5 acres of my property
20 and built a shed at a cost of about \$5,000 in order to provide space and housing for
21 my animals. In 2018, I purchased a cart and driving equipment totaling \$6,000, and
22 trained with two driving instructors to be able to enjoy and use my donkeys, so the
23 decision to let them go to a quieter and safer home was heartbreaking for me.
- 24 13. The enormous severity of the noise over my home and my neighbors' homes, as
25 well as over historic buildings, farms and fields, is impacting my ability to make and
26 market products from my business, engage in teaching, and encourage tourists to
visit my studio and the town of Coupeville. The rural landscapes, and the economic
and spiritual elements required for my community to function are being destroyed.
Low-level flights under 600 feet make living underneath the noise impossible -- I
can't talk, can't hear and can feel the noise inside my body. It makes me want to run
away as fast as I can, because my survival depends upon it. The noise also makes
me incredibly angry and stressed. As a result, my physician has
prescribed Lorazepam for me to take when the jets fly overhead at OLF Coupeville.
14. The noise since the expansion in March, 2019 is having consequences, for instance:

- 1 a) Congressman Larsen held a public meeting at the Coupeville library during a
2 legislative recess in 2019 and a nurse there talked about her cancer patients
3 whose recovery was being impaired by the jet noise;
4 b) I helped edit a film made by a father who watched his kids suffer at a baseball
5 game when jets began flying over the park they were playing in;
6 c) I have had friends come to stay at a local B&B and at my house in the summer
7 of 2019 and they will never come back because of the jet noise;
8 d) I have had customers run to their car for cover when jets begin flying, instead of
9 making a purchase from our shop;
10 e) I helped an unsuspecting bicycle rider getting off the ferry who was shocked off
11 her bike when a jet roared over her head and offered her a ride to take her
12 outside the noise area; and
13 f) I invite my children and grandchildren to visit only on weekends when jets
14 aren't scheduled to fly because I don't want them injured by the jet noise. This
15 makes sharing holidays with my children and grandchildren in my home
16 impossible.

17 15. Since March, 2019, as the number of operations at OLF increased, I have watched
18 "For Sale" signs emerge all over Central Whidbey. People who can afford
19 financially to leave, are leaving. I am literally watching my community unravel as
20 key people leave key sectors without leaders in our infrastructure. The Navy's jet
21 noise is breaking the 100-year relationship between people and the landscapes of
22 Central Whidbey. The US Congress authorized Ebey's Landing National Historical
23 Reserve in 1978, partly because of this amazing and rare unbroken relationship
24 between people and the land.

25 16. I am being traumatized and I watch my friends and neighbors in their trauma and
26 depression, which causes additional anxiety for me. As a result, my community is
traumatized. I believe that what I am experiencing from the impacts of jet noise is
similar to the impacts of a natural disaster... but this is neither natural nor does it
have any ending. This feels like irrevocable harm to the community that will
continue as long as the jets continue.

17 17. The Navy's expansion of Growler FCLP overflights at OLF Coupeville is causing
18 me and my community to suffer and to stifle our life pursuits. A community and the
19 inter-relationships built over time and generations cannot be moved. You can't
20 move a school, a hospital, a re-cycling center, animals, or a farm without destroying
21 the community they are part of. The Navy needs to stop the noise from FCLP's as
22 soon as possible while a better and sustainable long-term solution can be negotiated.

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Dated this 16 day of Dec, 2019, in Coupeville, Washington

By

