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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 USC § 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], Coupeville, Washington with my wife, Jacqueline. We have owned this house for a little over nine and a half years, staying here several weeks at a time, mostly in the summer, but we have lived full-time in the house and in this community for more than 4 years.

Decl. of Blankenship, Case No. 2:19-cv-01062-RAJ-JRC - 1

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1 3. I am a member of COER and fully support its activities with regard to the Navy jet
2 flights at OLF Coupeville.

3 4. I am a semi-retired attorney who moved here full-time in January 2016, with the
4 intent of living in and enjoying this beautiful, peaceful area. I first learned about Whidbey Island
5 when my daughter got married here in a destination wedding in 2007. I was immediately attracted
6 to the scenic views, the nearness to Puget Sound, the views of the Olympic Mountains, the
7 abundance of wildlife, the opportunities for outdoor recreation, the peace and quiet, and the people.
8

9 5. Our house is directly under the flightpath that the Navy jets take on the base-to-final
10 leg of their touch-and-go landings at OLF Coupeville. They fly directly over my house at an altitude
11 of no more than 200-300 feet in landing configuration with their landing gear and flaps in the down
12 position. The noise is deafening, so bad that we are unable to carry on a conversation inside our
13 own home, nor can we watch TV, listen to music, or even sit and read quietly. We cannot go outside
14 our house at all when the Growlers are flying because the noise is intolerable. Frequently,
15 depending on weather conditions, there is a strong and offensive odor from jet fuel fumes when the
16 Growlers are flying so low overhead.
17

18 6. I have an office inside our home where I continue to practice law representing a
19 number of clients. Whenever the jets are flying, I am unable to consult with or discuss matters by
20 telephone with my clients or other attorneys, nor can I devote the concentrated and focused efforts
21 to my cases that they and my clients deserve. I've had to terminate or postpone conference calls
22 when the jets are flying. All of this is impairing my ability to practice.
23

24 7. Before the 2019 Record of Decision, the Growler flights over my house were much
25 less frequent than they are now. Since the addition of the additional Growler jets to Whidbey Naval
26

1 Air Station as a result of the 2019 Record of Decision, the jets frequently fly 4-5 days a week, often
2 from late morning until after midnight, once every 45-60 seconds, with only a few short breaks.
3 This makes it impossible to enjoy any kind of normal home life or to do any legal work in my home
4 office.

5
6 8. Often the jets fly until between 10:00 pm and midnight, making it impossible to fall
7 asleep until after they stop.

8 9. The nearness of the jets to our house also causes the windows to rattle, the doors to
9 shake, and the hanging chandelier to vibrate.

10 10. We are very concerned, as we approach our retirement years, about the impact of
11 these flights on the value of our home, which is the only residence we own.

12 11. The increased frequency and duration of the flights since March 2019 causes us to
13 become irritable, short-tempered, and single-mindedly obsess over when the flights will cease for
14 the day. Growler operations have been occurring any weekday, day or night, but tend to be
15 scheduled into weeks of concentrated practice separated by periods without operations.

16 12. Our house is less than one mile from Runway 32 at OLF Coupeville. Because the
17 jets fly over us so low, we are constantly in fear that one of the pilots will make a mistake, or
18 experience some sort of mechanical failure, and crash his jet either directly into our house or a
19 nearby house in the neighborhood.
20

21 13. I am a pilot myself with a single engine land license and instrument and commercial
22 ratings. I am convinced that the Navy pilots use my house as a visual reference point to begin their
23 turns onto final for Runway 32 because it is the tallest house on our street. This insures that they
24 almost always fly directly over or slightly to one side of my house.
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10 day of Feb., 2020, in Coupeville, Washington.

BY:

