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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, Island County, Washington. I have lived in Coupeville since February 2019.
3. I am a member of COER. I joined COER in August or September of this year because we needed people to know just how bad the jet noise is for us at our home and we discovered that COER was speaking for our community.
4. My husband and I are retired. We first came to Whidbey Island looking for property for a small farm in December 2018. While looking for a farm we stayed in a vacation rental in Clinton on the south end of Whidbey Island. A Realtor we contacted showed us a five acre property in Coupeville to the north of the Coupeville Outlying Field. We

1 were initially reticent to purchase the property because we did not want to be
2 anywhere near the Navy jets. The Realtor had us come up on different occasions that
3 December when the jets were flying so that we could hear them for ourselves. At that
4 time the jets did not turn directly over the house we were thinking about buying, and
5 though there was some noise, it wasn't that bad especially indoors. The people selling
6 this house had built it and lived in it for 35 years. We also knew that the immediate
7 neighbors were all long time in the neighborhood. Based upon the levels of noise we
8 were hearing, and the fact that all the neighbors had lived there for decades, we
9 believed the jet noise wouldn't be that bad and decided to purchase the home. We
10 moved in around Valentine's Day 2019.

- 11
- 12 5. In March 2019 the Navy started flying more frequently and started turning directly
13 over our new home. Suddenly they were flying four to five days a week and the noise
14 levels we were experiencing was much worse than anything we had experienced when
15 we were thinking about buying this home. Now, when the jets were flying we could
16 not be outside and even inside our home the noise was unbearable. On one occasion
17 we measured the noise in our living room at 98 decibels. We had no idea that the noise
18 would be this bad. Our Realtor was surprised at how bad it had gotten. If we had any
19 idea that this is what we would have experienced we would not have purchased this
20 property.
- 21 6. Before the Navy ramped up the jet noise this property was our retirement dream. Our
22 dream was destroyed when the jet flight paths were changed, numbers of flights
23 increased, and the noise became unbearable. After several weeks of non-stop noise we
24 realized that we couldn't take it and started to think about selling the house and
25 moving but we can't because we cannot afford the loss in value if we were to sell
26 now.
- 27 7. The house had needed a lot of work when we bought it and we had quickly started
28 renovating. After the noise hit we stopped renovating. We hadn't even finished
29 unpacking and I hadn't put our photos on the walls before we started doubting our
30 decision to live here.
- 31 8. Our dream was to have a small farm with goats and Alpacas. We had planned to clear
32 trees from the property to make room for the animals. With the increased jet noise we
33 knew we couldn't put animals on the farm so we haven't cleared the trees. We knew
34 we couldn't subject farm animals to the jet noise. Like setting up our home, our dream
35 of living a farm life has been put on hold.
- 36 9. I love to take long walks with my dogs. But I can't even do that when the jets are
37 scheduled to fly because I don't want to get caught outside when they fly. We moved
38 to Coupeville to be outside in nature, but now I feel trapped inside my house.
- 39 10. Socially our lives have been put on hold. Because we don't know whether we can stay
40 or not, I have been unwilling to meet people and get involved in our new community.

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I am also afraid to talk about what we are experiencing because I am afraid of Navy supporters attacking us. I am a social person but I am becoming a recluse. I am also starting to experience physical effects from the noise. I have started to get heart palpitations whenever the jets show up, and now even when I see they are scheduled to fly. I do not want to spend my senior years afraid and hiding inside my home.

- 11. We have a five-month old grandson we love and want to be around but we don't want him coming to visit us at our home because we don't want to expose him to the jet noise. He visited us once when he was 2 months old and was exposed to the noise. When his family came they stayed with us in a separate log cabin on our property, and the plan was for that to be their house whenever they visited us. But we can't do that because the cabin is uninsulated and noise levels inside when the jets fly overhead aren't safe for anyone, especially an infant.
- 12. I am also worried about whether our well-water has been contaminated by the Navy fire-fighting foam at the Coupeville Outlying Field.
- 13. We do not want to leave our little piece of paradise, but the increased jet noise is making it impossible for us to stay here. We can't do any of the things we came to Coupeville for. We can't farm and raise animals. We can't enjoy our outdoor activities. We feel we can't commit to our new community because we don't know whether we can stay. We can't have our family come and stay with us. And we are unsure whether it is even safe, health-wise, for us to stay here.

Dated this 13 day of DEC, 2019 in Coupeville, Washington.

By:  _____