

The Honorable Richard A. Jones

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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,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
THE NAVY, et al.,

Defendants.

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

DECLARATION OF  
PORT TOWNSEND MAYOR



Pursuant to 28 U.S.C. § 1746 and under penalty of perjury, I, [REDACTED] [REDACTED] declare that the following is true and correct:

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 am the Mayor of Port Townsend, Washington and have been since 2016.
3. The City of Port Townsend is located at the northeast tip of the Olympic Peninsula, just across Admiralty Inlet from Whidbey Island.
4. There are about 10,000 residents in the City of Port Townsend. The city is home to Fort Warden State Park. The city is known for its collection of historic Victorian houses. It is one

1 of three Victorian seaports on the National Register of Historic Places. Fort Worden is on the  
2 National Register, too, along with approximately 40 individual properties and structures.

3 5. The City is impacted by the Growlers that fly out of Naval Air Station Whidbey.  
4 The planes produce deafening noise throughout the city, including in our downtown tourist area  
5 and at Fort Worden. The noise impacts visitors and residents alike.  
6

7 6. The City is concerned that the Growler operations are diminishing the integrity of  
8 the setting of the Port Townsend historic districts and the livability of our city. We have expressed  
9 these concerns to the Navy in commenting on the Draft Environmental Impact Statement and in  
10 Section 106 process, specific to protecting historic resources in the city. *See* Exhibit A and Exhibit  
11 B hereto. But the Navy has been unresponsive to our concerns. The Navy concluded the Section  
12 106 consultation process without entering into a memorandum of understanding that might have  
13 addressed our concerns. Instead, the Navy adopted a Record of Decision that increases the number  
14 of Growler's operating out of Whidbey NAS—and over our city.  
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16 7. The Navy's implementation of the Record of Decision has resulted in a considerable  
17 increase in noisy Growler's impacting our City's residents and visitors. I frequently get phone calls  
18 or am stopped on the street with complaints about the noise. Visitors and residents complain that  
19 the noise disrupts their ability to enjoy living in and visiting the city. The noise is damaging the  
20 integrity of the many historic resources we hold dear.  
21

22 8. I understand that the plaintiffs in this lawsuit are seeking a preliminary injunction  
23 to reduce the Growler flights to their pre-ROD levels during the pendency of the litigation. While  
24 I assume that would provide many benefits for the persons living and visiting on Whidbey Island  
25 close to the airfields, I want the Court to know that a preliminary injunction would also benefit the  
26 broader public by reducing impacts here in Port Townsend. The thousands of visitors to our historic

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sites and downtown area and our residents will benefit hugely from a reduction of Growler operations to their former level.

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

Dated this 11<sup>th</sup> day of February, 2020, in Port Townsend, Washington.

By:   
  
MAYOR OF PORT TOWNSEND