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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 EBEL'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
[REDACTED], SAN JUAN
COUNTY COUNCIL MEMBER

Pursuant to 28 U.S.C. § 1746 and under penalty of perjury, I, [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 a member of the San Juan County Board of County Council. The County Council voted on February 11, 2020 for me to make this statement on behalf of the entire Council.
3. San Juan County borders Island County and Whidbey Island. Our islands are as close to Ault field as OLF and Anacortes, Washington.

1 4. There are approximately 16,000 residents in the County. We receive over a million
2 visitors a year who come for the solitude and rural character. It is home to the San Juan Islands
3 National Monument.

4 5. The Growlers that fly out of Naval Air Station Whidbey affect our islands,
5 especially on Lopez and the south end of San Juan. The planes produce deafening noise that affects
6 schools and the conducting of business. The noise impacts visitors and residents alike.

7 6. The increased noise from the “Growlers” has affected real estate sales to the point
8 of putting disclaimers on listings. There has been no actual noise monitoring only computer
9 modeling. We have expressed these concerns to the Navy in commenting on the Draft
10 Environmental Impact Statement. *See* Exhibit A. These concerns were also voiced in a four county
11 comment letter on the DEIS. Nevertheless, the Navy has been unresponsive to our concerns.
12 Instead, the Navy adopted a Record of Decision that increases the number of Growler’s operating
13 out of Whidbey NAS—and over our County.

14 7. The Navy’s implementation of the Record of Decision has resulted in a considerable
15 increase in noisy Growler’s affecting our County’s residents and visitors. Noise complaints to San
16 Juan County’s website are up 59% over prior years since the record of decision. *See* Exhibit B.

17 8. I understand that the plaintiffs in this lawsuit are seeking a preliminary injunction
18 to reduce the Growler flights to their pre-ROD levels during the pendency of the litigation. The
19 injunction would benefit Whidbey Island as well as the surrounding communities and residents of
20 San Juan County. The peace, tranquility, and rural character that our visitors expect will improve
21 greatly from a reduction in “Growler” operations.

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

23 Dated this 12th day of February, 2020, in Friday Harbor, Washington.

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By:



SAN JUAN COUNTY COUNCIL MEMBER