EXHIBIT D

Use Zones (AICUZ) values and made the Growler seem quieter than the Prowler, and (5) used an annual DNL averaging for all days of the year which noise experts say is misrepresents proper DNL averaging protocol. All of this is thoroughly explored in Section 2.2 of the White Paper[1]. The main point, however, is that the 2005 and 2012 EAs based largely on that misinformation do not really support a 40-year NEPA compliance record.

Another distortion: *"field elevation is at or below 1,000 feet above mean sea level, in order to duplicate the atmospheric conditions at sea."* The 1000-foot criterion is misleading because actually density altitude is the critical metric, not actual altitude. That is, 1000 feet MSL has only partial relevance to atmospheric conditions at sea. Density altitude is a mix of actual altitude and atmospheric conditions that represent the altitude at which the aircraft feels it is flying—i.e, the way the plane handles and responds. Landing or taking off during high-density altitude conditions heavily influences approach speed, lift, and engine power output, changing length of landing roll and takeoff roll. Because a pilot is trained with feeling the aircraft, not just instrumentation, training is best when conducted in density altitudes the pilot will experience when landing on the carrier. Otherwise, pilots can hit the carrier deck too hard or miss it by flying too high. On May 29, 2016, for instance, a Growler landing aboard the carrier John C. Stennis in the South China Sea engaged the carrier arresting gear while still in flight. **[5]** Result: millions in damage.

Table 1.1.—Density altitude comparisons at four west coast FCLP training options versus actual carrier launch conditions in the Persian Gulf and South China Sea. These examples are based on an "average day" at each location [from www.USA.com].

Location	Elevation (feet)[a]	Air Temp. (°F)	Barometric Pressure[b]	Dew Point	Density Altitude
FCLP Training at OLF Coupeville					
OLFC	200	51	29.92	35	**337**
FCLP Training Sites, U.S. West Coast					
Lemoore NAS, CA	230	62	29.92	56	**678**
Moses Lake, WA	1189	50	29.92	45	**1010**
El Centro, CA	–40	75	29.92	40	**1284**
Yakima Training Area	1370	77	29.92	43	**2963**
Actual Carrier Launch Sites					
Persian Gulf	60	88	29.92	88	**2182**
Manilla[c]	60	88.2	29.92	79	**2367**
Ho Chi Minh City[3]	60	90.3	29.92	81	**2525**

[1] Technical Committee of Citizens of Ebey's Reserve. 2016. (White Paper) Outlying Field Coupeville: Its Time Has Passed, An Analysis of the Arguments. (See White Paper at http://citizensofebeysreserve.com/Index.html)

[a] Airfield elevations were taken from FAA Airfield Diagrams, and actual carrier elevations are mean sea level plus 60 feet to the flight deck.
[b] FAA "standard day" barometric pressure is 29.92.
[c] Historical climatological data was not available for the South China Sea, as bounded by Manila and Ho Chi Minh City, but weather for these two cities should closely approximate.

As evident in Table 1.1 above, OLFC does **not** reflect the density altitude in the South China Sea or in the Persian Gulf. However, many of the off-Whidbey sites casually dismissed in the DEIS are much closer to the actual density altitude in those distant trouble spots, and hence, the conditions pilots will experience there are much better achieved at the dismissed off-Whidbey sites. Yakima training area, for instance, a proposed OLFC alternative, has far greater clear area and, while 1400 feet above sea level, has a density altitude of 2963 (around that of the South China Sea). Training there might have prevented the costly Stennis accident and reduced loss of aircraft and pilot.

And, from DEIS Section 2.4.2 (Moving Some or All of the Growler Community Aircraft Elsewhere): *"Some members of the public have suggested moving all Growler squadrons to another installation. No installation exists that could absorb the entire Growler community* ***without excessive cost and major new construction.***" There was no cost analysis to document that costs would be "*excessive*" or what sort of dollar amount would establish an "*excessive*" threshold, or how such putative excessive costs would be subtracted from the socioeconomic costs of maintaining the Growler FCLPs on Whidbey such that a bottom line could be derived. Likewise, how many dollars constitute "*major*"? With 60% of our national budget and millions of construction and new aircraft costs for NASWI, the military is certainly not so pinched that it cannot justify a 21st century FCLP training venue for its Growler pilots. Case in point, the Navy was fully prepared to construct a wholly new Growler OLF in the swampy lowlands of eastern North Carolina for its pilots based in Oceana. Why was that cost so irrelevant there and yet relevant here? Section 1502.23 of NEPA addresses cost-benefit analysis:

> **If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered** for the proposed action, it shall be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences. To assess the adequacy of compliance with section 102(2)(B) of the Act the statement shall, when a cost-benefit analysis is prepared, discuss the relationship between that analysis and any analyses of **unquantified environmental impacts, values, and amenities.** For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and **should not be when there are important qualitative considerations.** In any event, an environmental impact statement should at least indicate those considerations, including factors not related to environmental quality, which are likely to be relevant and important to a decision.