



**City of Seattle**  
Mayor Jenny A. Durkan

June 12, 2019

Naval Facilities Engineering Command Northwest  
Attention: NWTT Supplemental EIS/OEIS Project Manager  
3130 N Charles Porter Ave  
Building 385, Admin, Room 216  
Oak Harbor, WA 98278-5000  
RE: 2019 Draft Navy Northwest Training and Testing Supplemental Environmental Impact Statement

To Whom It May Concern:

The City of Seattle has reviewed the Draft Northwest Training and Testing Supplemental Environmental Impact Statement (Draft EIS) and discussed the document with partner agencies and non-governmental organizations (NGOs) working to restore and protect Puget Sound and protect the safety and livelihood of the Southern resident orcas. The City of Seattle has significant concerns with the stated impacts to Southern resident orcas and other marine mammals.

Last summer, the collective heart of Seattle broke as we watched the mother of a dead orca calf mourn her offspring for 17 days. Orcas have lived in this region for at least 5,000 years, and are part of our cultural identity, fishing economy, and tourism industry. But Washington's Southern resident orcas are facing a dismal fate due to diminished salmon, toxic contaminants, and disturbance from noise and vessel traffic. Even the loss of one single orca would greatly undermine decades of recovery efforts—and even make recovery impossible.

The City of Seattle offers a unique voice on this issue, as we are the largest United States city within the critical habitat of Southern resident orcas. We are working with our partners to take collective action to protect and improve our creeks, lakes, the Duwamish River, and Puget Sound through [Protect our Waters](#) and [Salmon Recovery](#). We know our community members were strongly represented among the more than 18,000 public comments shared with Governor Inslee's [Southern Resident Orca Task Force](#), some of which highlighted concerns with the Navy's sonar and other training and testing activities. These activities will impact our marine mammals, especially orcas, who rely upon echolocation for hunting and navigation and sound to communicate within and between pods. Any loss in the ability to use bio sonar and vocalize will impact critical survival behaviors for the Southern resident orcas, including feeding, resting, and mating.

The City of Seattle supports and amplifies the many comments offered by important stakeholders, including Puget Sound Partnership, Washington Department of Fish and Wildlife, Seattle Aquarium, Washington Environmental Council, and Earthjustice. The City of Seattle recommends that the Navy take these comments seriously and would like to underscore the following concerns, comments, and recommendations:

- **The Draft EIS does not appear to integrate the latest analysis from NOAA's hydrophone network that were provided to the Navy in March.** This research indicates that the Navy is

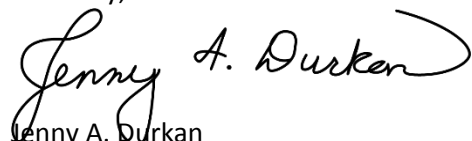
already altering the soundscape in areas where orcas are present and to minimize adverse effects on Southern resident orcas, testing and training in the Cape Flattery Offshore should be reexamined and potentially moved.

- **The Draft EIS does not appear to reflect the fact that the Southern resident orca critical habitat is likely to expand later this year.** The National Marine Fisheries Service (NMFS) is committed to proposing a rule to expand the designation of critical habitat off Washington, Oregon, and California by early October 2019. The Navy will need to adjust its plans accordingly.
- **The Draft EIS inaccurately states that Governor Inslee’s Orca Task Force did not identify Navy actions as a source for any of the identified threats to Southern resident orca.** Recommendation #25 from the Task Force report outlines the need to “address the acoustic and physical impacts to Southern Resident orcas from Naval exercises in waters and air of Washington state.”
- **The Navy should clarify and potentially adjust the times of year in which proposed activities will occur.** This is especially important when assessing impacts to fish and wildlife, which have seasonal movements and behaviors that will greatly determine whether Navy activities significantly affect each species in the proposed areas (e.g. rockfish, Southern resident orca).
- **Whale report alert systems should be used for real-time sightings and advance warnings, complementing the limited visual range of lookouts.** There are new real-time whale presence alert systems that the Navy should use to expand and speed up their awareness of likely imminent presence of Southern resident orcas beyond what the lookouts can do visually.
- **The Navy should include rigorous analysis, testing, and monitoring of newer technologies outlined in the Draft EIS**—such as high-energy lasers, kinetic energy weapons, and biodegradable polymer—as these are new and their effects are unknown.
- **The Navy should prioritize an increase in protections to reduce noise and disturbance affecting the Southern resident orca immediately.** Many other agencies and operators are taking new, meaningful steps to reduce noise and disturbance affecting Southern resident orcas. There are documented cases in this region of United States and Canadian naval activities—including active sonar training and explosive testing—causing direct harm, death, or displacement to the Southern resident orcas. Given the dire situation, it is critical the Navy immediately stop or adjust these activities.

The City of Seattle is bringing forward a resolution (draft attached to this letter) to express its concerns with the Navy’s proposed activities and underscore our commitment to working with our partners to ensure protections for Southern resident orcas and the restoration of Puget Sound. Our orcas face incredible environmental pressures, and we must do better protecting these irreplaceable members of our region. I call on the U.S. Navy to do their part to keep our waters healthy and safe for all sea life in the Puget Sound.

Thank you for the opportunity to comment.

Sincerely,



Jenny A. Durkan  
Mayor of Seattle