From: Orca Network
To: MakahDEIS.nwr@noaa.gov;
Subject: Comments for 2008 Makah DEIS
Date: Friday, August 15, 2008 1:22:56 PM

Please take into consideration our comments on the proposed Makah Gray Whale Hunt DEIS:

Orca Network is an education and advocacy non-profit organization, our projects include a Whale Sighting Network (for orcas, grays, humpbacks & other cetaceans in the Salish Sea and along the Pacific Coast), and the Central Puget Sound Marine Mammal Stranding Network.

We are very involved in following the status of Gray whales in the Pacific NW; our stranding network responded to a dead stranded gray whale in December 1998, which had died of starvation - this was the first of hundreds of gray whales to die during the next few years, bringing the gray whale population down. We have since responded to 1 - 2 dead gray whales each year in the Central Puget Sound region. We also closely track the travels of our "local" Saratoga Gray whales - 10 - 12 gray whales identified by Cascadia Research as coming into the waters of Puget Sound each spring to spend three months feeding in Saratoga Passage and Possession Sound. The same whales return each year to feed in their usual and accustomed feeding areas - this population often fares better than the larger "Resident" or migrating whale population, because they are a small group that rely on these specific feeding areas for three months (this year it was four months for several of them) during the year.

Many of these whales have been documented by Cascadia Research since 1990, returning all or most years to feed in Puget Sound, and the residents of Island County anxiously await the arrival of these grays each year, as they feed very close to shore providing excellent shore-based whale watching opportunities.

Although Orca Network respects the Makah Tribe and their culture, and we support efforts to revive and renew their cultural activities, we do not support their Gray whale hunt. We propose they take actions such as their neighbors, the Quielieutes, who instead of reviving their history of whaling, look into eco-tourism and whale watching as a way to celebrate their tribe's history and connection to the gray whales. The Makah do not rely on whale meat, and this is not a true subsistence hunt. We hope the Makah will move more toward conducting whale research, monitoring the

whales' movements and population over the years, rather than conduct a hunt to kill whales that could likely be a part of the very small community of Saratoga Grays, or the larger but local Resident population of grays that feed off the Washington Coast.

When our whale stranded in 1998, we assembled the skeleton for educational purposes. Members of the Makah Tribe came to some of our work sessions for advice and practice on assembling the skeleton of the whale they killed in their first hunt, which now hangs in their cultural center. We would like to see the Makah focus on showing people the natural history and beauty of the gray whales - including their history of hunting the whales and their spiritual connection to them, but realizing that not all cultural traditions should continue through the years. Keeping slaves and other cultural practices by many races in our country have been abandoned as we become more enlightened, and given the changes in human attitudes toward whales over the past fifty years, it is time for the Makah Tribe to take a close look at their plans and alternative options, and do the right thing for the whales and for their people. There is much scientific disagreement about what the population of our gray whales actually is at this time, or what direction it is heading - and with added unknowns such as effects of global warming, decline of many species, and the recent dip in the Gray whale population because of lack of food, we do not believe whale hunting on any scale should be allowed.

Gray whales are difficult to identify, even by researchers who know them individually very well - killing one of the local Saratoga Resident grays would take away 10% of the population of that group. The proposed action could take nearly 30% of the larger Resident Pacific Aggregate population in a period of 5 years.

On the human-side of this issue are the public safety issues - with increasing numbers of recreational boaters on our waters, a whale hunt could easily harm people in the vicinity. The unauthorized hunt that took place in Sept. 2007 was an example of how things can go really wrong. The hunters obviously didn't have control of their weapon, were shooting it in the Strait of Juan de Fuca with other boaters on the water, in an area where gray whales had been observed for months by local residents, often doing shore-based whale watching.

The authorization of this hunt also weakens the US' efforts at try to keep other countries from whaling. If we allow this as a subsistence hunt, when

it clearly is not a case of this tribe needing the whale meat to survive - we are only making a case for other countries to hunt whales. And when we allow the Makah to conduct an unauthorized whale hunt without consequence, our country is making the case for other countries to continue to flaunt the IWC whaling ban.

Therefore, Orca Network submits the following:

Alternatives 2 - 6 are entirely unacceptable. The only alternative that would not cause substantial harm to Washington's Resident Gray whale and the Saratoga Gray whale populations is Alternative 1 - No Action.

Thank you for considering our comments.
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Orca Network - Connecting whales and people in the Pacific Northwest

Orca Network is dedicated to raising awareness about the whales of the Pacific Northwest,
and the importance of providing them healthy and safe habitats.

Projects include the Whale Sighting Network and Education Programs, the Free Lolita Campaign,
and the Central Puget Sound Marine Mammal Stranding Network.