From: projseawolf@earthlink.net
To: MakahDEIS.nwr@noaa.gov;
cc: info@seawolfmedia.org;
Subject: 2008 Makah DEIS Comments
Date: Tuesday, June 03, 2008 8:56:11 AM

Steve Stone
NOAA Fisheries Northwest Region
1201 NE Lloyd Blvd., Suite 1100
Portland, OR 97232

June 3, 2008

Re: Proposed Makah Whale Hunt Resumption

This correspondence represents the collective opinion of the eight-member board of advisors for Project SeaWolf Coastal Protection, a federally-registered non-profit environmental advocacy group based in Marysville, Washington. Specifically, the opinions cited represent the views of Michael Kundu, Robert McLaughlin, Robert Wood, Patricia Woodfin, Wanzellia Clark, Anna Tyo, Brandy Knight, and Arun Kundu-Thomson.

We are in collective opposition to NMFS/NOAA issuing the Makah Tribe permission to resume a limited hunting of eastern north Pacific gray whales in the coastal portion of the Tribe's usual and accustomed fishing grounds, off the coast of Washington State, for ceremonial and subsistence purposes.

Our opposition, includes a deep concern that accurate population assessments, and changes, in eastern north Pacific gray whale stocks has not recently been reviewed; opinions recently expressed by researchers indicate that the estimated population may be lower than previously suggested, and thaht starvation may be impeding the recovery of the Pacific Gray whale population [reference at http://environment.newscientist.com/channel/earth/dn12623?DCMP=NLC-nletter&nsref=dn12623]; moreover, changes in coastal climatic conditions and oceanic quality have not been factored into the determination of a 'viable' harvest number established for this proposed hunt.

On a more pragmatic basis, we are also deeply concerned that the Makah Tribe have shown an inability to maintain control over the individual actions of tribal members, While we understand thatch this unauthorized hunt is a separate matter to this EIS, we maintain that the subsequent response taken by the Makah Tribe to address the action of the hunt has a very significant impact on the potential outcome of any decision made by NMFS/NOAA on this EIS.

Members of the Makah Tribe who undertook this unauthorized hunt, and who continue to express their intention to hunt gray whales despite any restrictive action of either tribal or federal governments, have not been adequately controlled by the Makah Tribal government. We are very concerned that, when unlawful or illegal hunts do occur outside of both tribal and federal protocols, the tribe has shown an official 'unwillingness' to hold their members accountable for the legal violations of marine conservation rules, federal/tribal agreements, and the federal Marine Mammal Protection Act - based on recent violations by the renegade whaling crew headed by Wayne Johnson, there can be no assurances that the tribe will hold accountable, nor legally enforce against, any member of the tribe who violates the co-operative laws governing wildlife conservation or marine mammal protection in the waters off Neah Bay and the Olympic National Park Marine Sanctuary.

In the absence of any 'good faith' willingness for the tribe to sanction or adequately penalize any of their own membership who have violated both tribal and federal laws, any agreement between NMFS/NOAA and the Makah Nation cannot be considered binding nor viable.

Given the nature of our concerns, it is our hope that the NMFS/NOAA will select the 'No Action' course of response in this EIS: selection of this response will result in the Makah Tribe being held to the same level of accountability (in reference to marine mammal conservation laws) that other US citizens are subject to. Since the conservation of cetaceans and other marine mammals must be conducted on a level playing field by all residents and constituents of any given region, we believe that this action would be the appropriate one to pursue.

Thank you for the opportunity to present our perspectives.

Cordially,

Michael Kundu, Lake Stevens, WA (point-of-contact)

cc.
Robert McLaughlin. Issaquah, WA
Robert Wood, Seattle, WA
Patricia Woodfin, Flower Mound, TX
Wanzellia Clark, Marysville, WA
Anna Tyo, Marysville, WA
Brandy Knight, Monroe, WA
Arun Kundu-Thomson, Vancouver Island, British Columbia, Canada

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