From: Cory Gardner
To: MakahDEIS.nwr@noaa.gov;
Subject: 2008 Makah DEIS
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I would like to outline several factors as to why the Makah should not be permitted to take whales.

1.) Ecotourism: Grey Whales are a key element to ecotourism industries in Mexico, USA, and Canada. Whale watching is more profitable than whaling, making millions of dollars each year in direct revenue. It should also be taken into consideration that peoples working in these fields form attachments to certain animals. Animosity toward the Makah tribe can only increase if one of the animals who has a name, is considered a friend, etc is killed. As the whales migrate up the coast, there is now way to tell which groups have formed an attachment to which animals, and no way to tell the whales apart. Ecotourism and whaling cannot exist side by side.

2.) Population Estimates: New studies show that the Grey Whale population has not recovered to historical levels as previously thought. Recent studies of grey whale DNA indicates that between 78,500 and 117,700 grey whales existed before commercial whaling decimated the population. Current population estimates puts grey whales at 22,000, which based on the recent DNA study, puts them at one-third to one fifth of their historical levels, which is far from a recovered population. This estimate differs from the IWC estimates but should be considered far more accurate, as it uses genetic testing, current technology, and scientific knowledge.

3.) Food supply: Scientists studying the Grey Whale population have observed changes in the whales' appearance and behaviour, including emaciation, later migration, not migrating as far North, and a decrease in calf production. These are thought to be due to a reduction in food supply in the Bering Sea caused by global warming. Environmental stressors will only increase with the impact of global warming, and the Grey Whale population will suffer as a result.

4.) Public Opinion: The world is largely against whaling. Killing sentient beings has no place in a conservation-oriented society.

5.) Non-Traditional Methods: On the 1999 hunt, the Makah did not use traditional methods to kill the whale they took. If they truly wanted to hunt whales in a traditional manner, they would use all traditional methods. One can only conclude, as they are not using traditional methods to hunt, that there must be another

reason.

"The International Whaling Commission permits four cartridges in whaling: the and the .460 Weatherby Magnum, .50 BMG, and the .577 Tyrannosaur, which the Makah fired in the 1999 hunt."

6.) Ceremonial and Subsistence Use: The Makah were permitted to take whales for ceremonial and subsistence use. Why, then, were the Makah considering selling whale meat for profit? As outlined above, whale watching is far more profitable than whaling. Selling the meat should be considered unacceptable, as it conflicts with the original purpose of killing whales for ceremonial and subsistence purposes.

"The key to Makah economic prosperity had always been the whale trade, and the Tribal Council began to realize that a return to this trade may just prove to be the economic savior that the tribe had been waiting for. Japanese market prices pegged the value of one gray whale at anywhere from $500,000 to 1 million dollars, and since the Makah were the only Americans with a legal treaty right to hunt gray whales, they would have no competition for these dollars. According to a April 1995 memo written by Mike Tillman, Deputy Commissioner of the U.S. Delegation on Whaling Issues, both Japan and Norway had contacted the Makah about buying any potential whale meat, and the Makah were contemplating building a processing plant."

This directly conflicts with the IWC's definition of subsistence use:

"(1)The personal consumption of whale products for food, fuel, shelter, clothing, tools, or transportation by participants in the whale harvest. (2) The barter, trade, or sharing of whale products in their harvested form with relatives of the participants in the harvest, with others in the local community or with persons in locations other than the local community with whom local residents share familial, social, cultural, or economic ties. A generalized currency is involved in this barter and tra[d]e, but the predominant portion of the products from each whale are ordinarily directly consumed or utilized in their harvested form within the local community; (3) The making and selling of handicraft articles from whale products, when the whale is harvested for the purposes defined in (1) and (2) above."

7.) Contaminants: Whale are particularly suceptible to contamination from toxins in the marine environment. High levels of PCBs, DDT, dioxin, pesticides, and heavy metals such as mercury make whale meat unsafe for human consumption. Humans should be prevented from consuming this meat at all costs.

"PCBs can cause neurotoxicity (nerve damage), reproductive and developmental

disorders, immune system suppression, liver damage, skin irritation, and endocrine disruption. DDT exposure is associated with certain cancer risks and neurological and reproductive disorders. Dioxins, among the most toxic substances known, can cause cancer, metabolic dysfunction, and immune system disorders. Methylmercury consumption can cause neurological and developmental problems. The contaminants are often highly concentrated in blubber because they are lipophilic, meaning they bond easily and even preferentially to fat."

In the past, whales were hunted for food by the Makah, Grey Whales for oil. There is no need to hunt whales for food in the 21st century, and there is also no need in particular for Grey Whales to be hunted for oil (as the Makah hunted them for in the past), as there are other sources of oil available that do not conflict with tourism industries and public opinion.

Thank you for your consideration of my input into this matter.

Sincerely,

Ms. Cory Gardner