13 August 2008

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

Re: 2008 Makah DEIS (Makah Tribe's Request for Permission to Hunt Whales)

To the National Marine Fisheries Service:

Harvard geneticist Richard Lewontin has said: "That is the one point which I think all evolutionists are agreed upon, that it is virtually impossible to do a better job than an organism is doing in its own environment."[1] We strongly agree. Friends of Animals (FoA), a nonprofit animal-advocacy organization, opposes hunting.

Thus, as the National Marine Fisheries Service (NMFS) addresses the proposed authorization of the Makah Whale Hunt, FoA supports only Alternative 1 of the Draft Environmental Impact Statement. Alternative 1 is "the No-action Alternative, wherein NMFS would not authorize a Makah gray whale hunt."[2]

Friends of Animals urges the NMFS to choose the No-action Alternative to the draft environmental impact statement (DEIS) concerning the Makah Indian tribe's February 2005 request to resume whale hunting, and this can be done on the basis of several factors:

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[1] Quoted by Richard Dawkins in *The God Delusion* (Boston: Houghton Mifflin, 2006), at 191.

[2] *Makah Whale Hunt EIS (May 2008).*

- Populations of eastern North Pacific gray whales (*Eschrichtius robustus*), which migrate from Arctic waters to the Gulf of California in Mexico, have grown substantially, and they have been removed from the Endangered Species List. Because the whales have been delisted, the reasoning goes, the species' health would not be harmed by the hunt. Yet a report in the *Proceedings of the National Academy of Sciences* asserts that "large numbers of gray whales have recently been discovered suffering from starvation."[3] The article goes on to say that "starving whales may be suffering reduced food supply from changing climate conditions in their Arctic feeding grounds." This possibility parallels 2006 reports last year of major climate shifts in the Arctic ecosystems in which gray whales feed.[4] Given how little scientists yet know about the climate shift phenomenon, the impact of killing these whales is unpredictable.

- The Makah request to resume whale killing did not take such climate shift factors into account; it pre-dated them.

- The Makah request to resume whale hunting would ostensibly be for "ceremonial and subsistence purposes" only. The Makah tradition of killing whales was suspended in the 1920s, when hunting drove gray whales to near-extinction. The Makah Nation itself agreed to halt the killing.

- Over the intervening decades (before the Makah were again permitted to kill a whale in 1999), the tribe has subsisted without killing whales. New traditions, therefore, have taken the place of former ones.

- If the Makah tribe wishes to maintain a cultural connection with gray whales, it could do so through rituals, ceremonies, crafts, and drama, rather than by killing. Promotion of carefully planned ecotourism in the form of whale watching could also provide the Makah with a viable source of income and an opportunity for the tribe members to maintain their cultural connection with whales. It would also spare the lives of the whales.

- Whale kills are a source of international controversy. Permitting the Makah to hunt eastern North Pacific gray whales would only encourage other aboriginal peoples and countries to hunt whales, legally or not. The Makah request must be seen in the context of the international effort to protect whales internationally.

For the above-described reasons, and based on the above factors, Friends of Animals respectfully requests that the National Marine Fisheries Service choose Alternative 1.

Friends of Animals, headquartered in Darien, Connecticut, is a nonprofit organization founded in 1957. Our work to protect animal communities includes the Marine Animal

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[3] *Proceedings of the National Academy of Sciences* (10 Sep. 2007).

[4] Release titled "Gray whales a fraction of historic levels, genetic research says "(10 Sep. 2007), issued be Steve Palumbi, Harold A. Miller Professor at Stanford; contact address supplied: spalumbi@stanford.edu.

Rescue project based in Los Angeles County, California; as well as ongoing efforts to protect North American wolves, North African antelopes, chimpanzees in Senegal, and to stop the import of tropical birds for the caged-bird trade. FoA has a long-standing interest in working for the integrity of communities of marine mammals within the ecosystems to which they have naturally adapted.

Very truly yours,

Priscilla Feral
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