



Chickaloon Village Traditional Council

(Nay'dini'aa Na' Kayax)

December 31, 2024

Chief Gary Harrison,
Chairman/Elder

Philip Ling,
Vice-Chair

Cheryl Sherman,
Secretary

Doug Wade,
Treasurer/Elder

Lorraine Wade,
Member/Elder

Emily Ling,
Member

Lisa Wade,
Executive Director

Serena Martino,
Executive Assistant

Cara Hotchkin
National Marine Fisheries Service - Office of Protected Resources
National Oceanic and Atmospheric Administration
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Margaret Zhu
HDR
582 E 36th Suite 500
Anchorage, AK 99503
margaret.zhu@hdrinc.com

Re: Comment letter on NOAA-NMFS-2024-0030; Port of Alaska Modernization Program

Ugheli Dzaen (Good Day) Ms. Hotchkin and Ms. Zhu:

Chickaloon Native Village (CNV) or Nay'dini'aa Na' Kayax is a federally recognized Tribal Government in Alaska (Federal Register, Volume 47, Number 227, November 24, 1982, and reaffirmed in Federal Register, Volume 58, Number 202, October 21, 1993), with the full power and authority to consult and enter into agreements with local, state, and federal governments at their discretion. Chickaloon Village Traditional Council is the governing body of CNV as recognized by CNV Tribal citizens with the full power and authority to act for CNV. CVTC has a responsibility to provide a government for the good health and welfare of its Tribal citizens and address any needs in its community. Actions that occur within CNV's traditional ancestral territories and customary area of use, including Cook Inlet, may impact our environment, our cultural resources including salmon, and the health, safety, and welfare of our Tribal citizens and community.

Cook Inlet waters and intertidal areas, including the habitat around the Port of Alaska (POA), is essential habitat for Cook Inlet beluga whales, Chinook salmon, coho salmon and other species that are experiencing serious population declines. The proposed Port of Alaska modernization activities may negatively impact species of cultural importance.

For the protection and conservation of Cook Inlet beluga whales, the protections provided by the POA during modernization project activities should be expanded to include the following:


- Bubble curtains should be required for all impact or vibratory driving of any pile type (permanent or temporary) of all pile sizes (24, 36, and 72 inch as well as other sizes) in all water depths (0.1 meters and deeper) in all months of the year;
- Between August and October when Cook Inlet beluga whales are most likely to be in the area around the Port of Alaska, two separate and completely overlapping layers of bubble curtains should be required for all impact or vibratory driving of

any pile type of all pile sizes in all water depths (0.1 meters and deeper), or impact or vibratory driving of any pile type should be prohibited during those months;

- The Port of Alaska project should cover the costs of having NOAA NMFS study the noise protections offered by the bubble curtains including during different water temperatures, sediment loads, water currents, and other factors which may affect the protections for whales;
- Annually, NOAA NMFS and the Port of Alaska should meet to discuss methods and devices for protection of whales that can be implemented in subsequent months/years of this project.

CVTC views their role as stewards of the land and waters not only as a responsibility to their traditional territory but as part of a broader commitment to safeguarding Alaska's ecosystems. This stewardship reflects a deep cultural and spiritual obligation to preserve balance and ensure that Tribal citizens can continue to engage in cultural lifeways. For follow up question or additional information please contact Stephanie Freeman, CVTC's Environmental Stewardship Administrative Assistant, at smfreeman@chickaloon-nsn.gov.

May Nek'eltaeni (Creator) Guide Our Footsteps,


Chief Gary Harrison (Dec 31, 2024 10:21 AKST)

Traditional Chief Gary Harrison
Chairman







2024.12.31 Port of Alaska Modernization Comment

Final Audit Report

2024-12-31

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