



Chickaloon Village Traditional Council (Nay'dini'aa Na')

September 18, 2019

Chief Gary Harrison,
Chairman/Elder

Rick Harrison,
Co-Chairman

Shawna Larson,
Vice-Chairwoman

Lisa Wade
Secretary

Albert Harrison,
Treasurer/Elder

Doug Wade,
Elder Member

Kari Shaginoff,
Member

Sondra Shaginoff-Stuart,
Member

Brandy O'Malley,
Acting Executive Director

Shelia Olson,
Executive Assistant

U.S. Dept. of Interior
Indian Affairs (BIA)
Alaska Region Regional Office
Indian Affairs
3601 C Street Suite 1200
Anchorage AK 99503-5947

Subject: Written comments on 170.443 regulation changes.

Dear BIA,

Chickaloon Native Village (CNV) is in support of dropping 170.443 requirements for existing proposed roads in the National Tribal Transportation Facility Inventory since they were created under rules in effect at that time of submission prior to November 7, 2016. CNV is also in support of dropping 170.443 for future proposed roads. A Tribe's authority to control their Tribal Transportation Program Inventory and submit routes that are important to their Tribal citizens will be hindered if they must follow certain aspects of 170.443 especially in regards to Right of Way issues. Requiring all Tribes to get Right of Way permission prior to a road being designed is backwards in the process of road building and limits a Tribe's ability to consider routes that currently face opposition but may gain acceptance in the future by the right of way owner.

Chickaloon Native Village also opposes 170.447. Limiting proposed roads to less than 15 miles is a limitation that was created by someone that has never been to Alaska. Many Villages are more than 15 miles apart and not allowing Tribes to propose roads between Villages because of this arbitrary rule is unjust.

Thanks for taking the time to consider our comments.

May Creator Guide our footsteps.

Brandy O'Malley
Acting Executive Director