EXPLOITERS
FRIENDS
of ANIMALS

November 2, 2026

VIA Federal Energy Regulatory Commission eFiling
(https://ferconline.ferc.gov/eFiling.aspx)

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission

Re: Docket No. P-15423-000; DeepGreen Cook Inlet SPV LLC; Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions To Intervene, and Competing Applications, 91 Fed. Reg. 56879 (Sept. 4, 2026)

Dear Secretary Reese:

Friends of Animals,[1] respectfully submits these comments on behalf of the organization and its members in response to the Federal Energy Regulatory Commission's (FERC) Notice, *DeepGreen Cook Inlet SPV LLC; Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions To Intervene, and Competing Applications*.[2] The Project would introduce substantial new industrial activity directly into designated critical habitat for endangered Cook Inlet beluga whales, who are already facing significant threats from noise, existing oil and gas development in the Cook Inlet, habitat degradation, prey reduction, and other anthropogenic activities. Friends of Animals opposes advancing this Project because its potential effects would add to those existing pressures and undermine the survival and recovery of Cook Inlet beluga whales.

On February 11, 2026, DeepGreen Cook Inlet SPV, LLC filed an application with the Commission for a preliminary permit to develop the proposed Project in Upper Cook Inlet near Nikiski, Alaska, and the Commission accepted an updated application on September 1, 2026.[3] The proposed Project encompasses approximately 1,400 to 1,650 acres and includes a 100-megawatt tidal-energy generation facility and subsea data center. Its principal components include approximately 330 to 350 marine hydrokinetic turbines, 66 subsea data-center pods, scour-protection infrastructure, and a roughly 3.5-mile armored hybrid power/fiber-optic subsea cable connecting the offshore facility to a landing site in the Nikiski Industrial Corridor.[4] The Project would thereby introduce

[1] Friends of Animals is an international nonprofit advocacy organization, incorporated in the state of New York since 1957. With thousands of members worldwide, FoA advocates for animals both free-living and domestic. FoA has commented on numerous federal actions regarding Cook Inlet marine mammals and Cook Inlet beluga whales.
[2] DeepGreen Cook Inlet SPV, LLC; Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions to Intervene, and Competing Applications, 91 Fed. Reg. 56879 (September 4, 2026).
[3] DeepGreen Cook Inlet SPV, LLC application, FERC Docket No. P-15423-000 (filed Feb. 11, 2026, supplemented June 26, 2026), https://elibrary.ferc.gov/eLibrary/search (enter "P-15423," in the docket-number field, omitting the final three digits).
[4] 91 Fed. Reg. at 56879 https://www.federalregister.gov/d/2026-18151/p-2.

construction activity, vessel traffic, underwater noise, seabed disturbance, and continuous industrial operation into an ecologically sensitive marine environment already subject to substantial and numerous industrial pressures.

Friends of Animals is alarmed that the applications do not adequately disclose or consider the Project's environmental risks. The Project poses a serious risk to Cook Inlet belugas and other marine species. Although a preliminary permit under Part I of the Federal Power Act (FPA) does not authorize construction or operation of the data center, it could still risk harming belugas, particularly by contributing to increases in noise related to potential seismic surveying, vessel activity, as well as installation of survey equipment on the seafloor.

Moreover, issuance of the Permit also preserves an applicant's priority to apply for a subsequent license while it investigates and studies a proposed project's feasibility.[5] That limited purpose does not resolve Friends of Animals' objection: FERC should not grant regulatory priority to this proposed industrial development within endangered beluga critical habitat. The Project's unresolved operational and environmental risks, considered alongside the population's endangered status and the cumulative pressures already affecting Cook Inlet, weigh against issuance of the requested permit. Friends of Animals therefore requests denial, rather than approval conditioned on additional studies or assurances that environmental concerns can be addressed at a later licensing stage. Issuance of any permit to further investigate or construct a subsea AI data center in the Cook Inlet would be inconsistent with the Marine Mammal Protection Act (MMPA) and the recovery needs of Cook Inlet beluga whales.

DISCUSSION

A. Cook Inlet beluga whales remain far below recovery levels and cannot absorb additional industrial pressure.

Cook Inlet beluga whales (*Delphinapterus leucas*) are endangered and have faced ongoing staggering declines for decades. The loss of even one Cook Inlet beluga whale should be considered devastating to the current population, as well as to the recovery of this magnificent species. As Cook Inlet belugas are a NOAA "species in the spotlight," and considered a "recovery priority #1."[6] The significant risks and urgent need to support recovery of these world-renowned beings should be prioritized in FERC's assessment of the Project.[7] Given the severe risk to Cook Inlet belugas, FERC should specifically address a needed reduction of anthropogenic activities within the Cook Inlet, and deny the preliminary permit, or similar permit applications. Indeed, even investigative

[5] 16 U.S.C. § 797(f); 18 C.F.R. §§ 4.80-4.83.
[6] NOAA Fisheries, *Beluga Whale: In the Spotlight*, https://www.fisheries.noaa.gov/species/beluga-whale/spotlight (last visited April 1, 2026).
[7] NOAA Fisheries, *Species in the Spotlight Priority Actions 2021-2025, Cook Inlet Beluga Whale* (March 2021), http://media.fisheries.noaa.gov/2021-04/SIS%20Action%20Plan%202021_Cook%20Inlet%20Beluga-FINAL%20508.pdf.

activities to evaluate the Project risk disrupting these belugas, particularly by contributing to increases in noise related to potential seismic surveying, vessel activity, as well as installation of survey equipment on the seafloor. Denying the preliminary permit would instead support recovery efforts while eliminating short-term, and long-term harassment, and further endangerment to the species.

The 2021 and 2022 population estimates for Cook Inlet belugas place the population at approximately 331 individuals, which is well below recovery objectives. [8] While the estimate may have increased slightly from a 2018 estimate , the stability of any population increase remains uncertain. These estimates do not indicate a confirmed recovery trend, particularly given the inherent variability in survey conditions and detection methods. Notably, the estimate of 331 individuals does not meaningfully offset the species' long-term decline of approximately 75% from a historic population of about 1,300 in 1979.[9]

Additionally, 2025 aerial survey data by NOAA Fisheries has yet to be incorporated into current population estimates. As a result, no updated official population figure is available.[10] Proceeding with authorization of any permits before this data is fully reviewed is especially concerning, given the species' known behavioral patterns, including congregation in specific areas for feeding and reproduction.[11]

The Endangered Species Act (ESA) requires federal agencies to carry out their authorities in furtherance of endangered species conservation. Section 7(a)(2) specifically requires each federal agency, in consultation with the appropriate wildlife agency, to ensure that actions it authorizes, funds, or carries out are not likely to jeopardize the continued existence of listed species or destroy or adversely modify designated critical habitat.[12] Because the Project would be located within designated critical habitat for the Cook Inlet beluga whale, FERC must account for potential effects on the species and its habitat, including effects from early exploration, before granting the proposal any regulatory priority. Given the population's small size and endangered status, preventing any disturbance and habitat degradation is essential to protecting the whales' remaining habitat and supporting their recovery.

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[8] NOAA Fisheries, *New Abundance Estimate for Endangered Cook Inlet Beluga Whales* (June 15, 2023), https://www.fisheries.noaa.gov/feature-story/new-abundance-estimate-endangered-cook-inlet-beluga-whales.
[9] NOAA Fisheries, *New Abundance Estimate for Endangered Cook Inlet Beluga Whales*, 2023.
[10] NOAA Fisheries, *NOAA Fisheries to Delay New Aerial Survey for Cook Inlet Beluga Whales Until June 2025* (June 14, 2024), https://www.fisheries.noaa.gov/feature-story/noaa-fisheries-delay-new-aerial-survey-cook-inlet-beluga-whales-until-june-2025.
[11] NOAA Fisheries, *Species in the Spotlight Priority Actions 2021-2025, Cook Inlet Beluga Whale* (March 2021), http://media.fisheries.noaa.gov/2021-04/SIS%20Action%20Plan%202021_Cook%20Inlet%20Beluga-FINAL%20508.pdf.
[12] 16 U.S.C. § 1536(a)(1)-(2)

B. Potential harassment of Cook Inlet beluga whales and implications under the Marine Mammal Protection Act

The MMPA was enacted in response to Congressional concern that "certain species and population stocks of marine mammals are, or may be, in danger of extinction or depletion as a result of man's activities."[13] Under the MMPA, it is unlawful to take any marine mammal unless as permitted by statutory exception.[14] Take is defined as "to harass, hunt, capture, or kill, or attempt to harass, hunt, capture, or kill any marine mammal."[15]

Under the MMPA, citizens are only allowed to take "small numbers of marine mammals of a species or population stock" for less than "five consecutive years each" if such taking: (1) will have a negligible impact on such species or stock; and (2) will not have an unmitigable adverse impact on the availability of such species or stock for taking for subsistence uses.[16] In order to determine whether a take is negligible, the potential cumulative impact from past, current, and future activities and their impact on the environmental baseline must be considered.

DeepGreen's Project would harass and take Cook inlet belugas in various ways, including hearing impairment, separation of family groups, loss of prey and/or habitat, disturbances to biologically sensitive feeding and mating areas, bodily harm, behavioral changes, and synergistic and/or cumulative effects, amongst others. For these reasons, the numerous negative effects of the Project do not constitute negligible impacts, and therefore, DeepGreen does not meet the qualifications for approval of its applications or any permits.

The Marine Mammal Commission 2018 Stock Assessment states, "even one take every two years may still impede recovery."[17] Notably, the Cook Inlet Beluga population between 2014 and 2016, as reported in the 2018 assessment similarly ranged between 340 and 328 individuals.[18] This continues to underscore how sensitive this beluga population is to repeated disturbance. With every new project, as well as renewal of activities, the estimated number of takes undermines the ability of the Cook Inlet beluga whale to survive and recover, especially when considered in combination with existing anthropogenic activities within the Cook Inlet. Moreover, there are already a prominent number of authorizations throughout the Cook Inlet allowing for the take of Cook Inlet

[13] 16 U.S.C. § 1361(1).
[14] 16 U.S.C. § 1371(a).
[15] 16 U.S.C. § 1362(13).
[16] 16 U.S.C. § 1371(a)(5)(A)(i)(I).
[17] Marine Mammal Commission, *Alaska Marine Mammal Stock Assessments, Cook Inlet Stock* at 112 (2018), https://www.mmc.gov/wp-content/uploads/2018-Alaska-SAR-Cook-Inlet-Beluga-Whale.pdf.
[18] *Id*. at 109.

beluga whales. Between 2017 and 2025, NMFS authorized approximately 120,000 disturbances/incidental takes of Cook Inlet beluga whales.[19]

Noise remains one of the highest threats to Cook Inlet beluga whales, and the Project would introduce multiple new sources of it: turbine installation and operation, construction, maintenance, increased vessel traffic, and preliminary study activities involving sonar, echosounders, or other hydrographic equipment, and likely seismic surveying. Given the many activities already occurring in Cook Inlet, FERC should not entertain exploration or other activities toward the potential construction of a subsea AI data center. Against that backdrop, FERC cannot reasonably conclude that noise and other sound disturbances from exploration or the project would have only negligible or reversible effects on belugas or other marine life.

Belugas rely heavily on sound for communication, navigation, maintaining social cohesion, locating prey, and detecting threats. Their use of echolocation is especially important in Cook Inlet, where glacial silt limits underwater visibility. Cook Inlet beluga whales possess sensitive hearing and a reliance on acoustic communication, making them particularly vulnerable to the disruptive effects of anthropogenic noise, even within long ranges.[20] Impairment of their hearing from intense and ongoing noise exposure can disorient their sense of direction, negatively impacting their ability to communicate, navigate, forage, locate prey, and avoid predators.[21] The Project's noise could mask beluga communications, interfere with navigation and feeding, disrupt social behavior, and displace whales from biologically important habitat.

In NMFS's Recovery Plan, NMFS acknowledges that anthropogenic noise from drilling for oil and gas, dredging, tugboats, and even surveillance helicopters pose high risks of interfering with the beluga's recovery.[22] Studies also demonstrate that commercial shipping activities mask beluga calls and vocalizations.[23] Only recently, in 2023, it was found that Cook Inlet belugas have forty-one calls.[24] Each of the most utilized calls were

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[19] Migura, M. & Bollini, C., *To take or not take? Examination of the status quo process for issuing take authorizations of endangered Cook Inlet beluga whales and implications for their recovery*, 4 Conservation Science and Practice e590 (2021).
[20] Natl' Marine Fisheries Serv., *Recovery Plan for the Cook Inlet Beluga Whale (Delphinapterus leucas)* [II-52] (2016), https://www.fisheries.noaa.gov/resource/document/recovery-plan-cook-inlet-beluga-whale-delphinapterus-leucas.
[21] NOAA Fisheries, *Vocal Repertoire of Cook Inlet Beluga Whales Documented for the First Time* (December 11, 2023), https://www.fisheries.noaa.gov/feature-story/vocal-repertoire-cook-inlet-beluga-whales-documented-first-time.
[22] *Nat'l Marine Fisheries Serv*, supra note 20, at III-13.
[23] Castellote, M. et al., *Anthropogenic Noise and the Endangered Cook Inlet Beluga Whale, Delphinapterus leucas: Acoustic Considerations for Management*, 80 Marine Fisheries Review 63-88 (2019), https://www.researchgate.net/publication/333356584_Anthropogenic_Noise_and_the_Endangered_Cook_Inlet_Beluga_Whale_Delphinapterus_leucas_Acoustic_Considerations_for_Management.
[24] NOAA Fisheries, *Vocal Repertoire of Cook Inlet Beluga Whales Documented for the First Time* (December 11, 2023), https://www.fisheries.noaa.gov/feature-story/vocal-repertoire-cook-inlet-beluga-whales-documented-first-time.

identified as compromised or entirely masked by shipping activities.[25] The Cook Inlet is *already* "naturally noisy, complex, and dynamic," due to a variety of natural sources.[26] This natural baseline only raises the "potential for negative effects when anthropogenic sources of noise are introduced into the inlet."[27]

C. Unresolved operational risks weigh against granting a preliminary permit.

The application leaves fundamental questions unanswered about the Project's compatibility with Cook Inlet belugas, their prey, and critical habitat.[28] These questions weigh directly in favor of denying the requested preliminary permit. The application does not adequately explain how construction, operation, surveys, maintenance, and vessel traffic would compound existing underwater noise exposure and disturbance; how heat from 66 subsea data-center pods would disperse and potentially affect or fragment habitat for belugas, salmon, and other marine life; or what risks cooling fluids and leachable materials could introduce.[29] These thermal concerns warrant particular scrutiny. A 2024 systematic review found that power-plant thermal discharges can alter dissolved oxygen, pH, and sediment composition and generally reduce the abundance and diversity of organisms living on or near the seabed.[30] The review's Table 2 lists increased heavy metals among the environmental changes associated with one cold-water discharge scenario.[31] A 2020 study included in the review also found that thermal discharge influences the uptake of metal in marine organisms.[32] The application also does not adequately explain how the facilities would remain powered and cooled when tidal currents slow or stop, what environmental risks backup systems would create, or how hundreds of turbines, anchoring systems, and scour protection could affect marine organisms, noise exposure, currents, sediment transport, fish passage, and prey availability.[33] Generalized assurances about renewable energy or technological innovation cannot substitute for adequate engineering information and project-specific environmental analysis.

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[25] *Id.*
[26] *Nat'l Marine Fisheries Serv,* supra note 20, at III-10.
[27] *Nat'l Marine Fisheries Serv*, supra note 20, at III-11.
[28] Rebecca Palsha, 'Sloppy is the way I would describe this approach': Unknown plans for an underwater data center in Cook Inlet, 2KTUU AK News Source, last visited on Oct. 28, 2026, https://www.alaskasnewssource.com/2026/10/28/sloppy-is-way-i-would-describe-this-approach-unknown-plans-an-underwater-data-center-cook-inlet/.
[29] Alaska News, *A Fishing Advocate Warns Kenai over an Undersea Cook Inlet Data Center*, Alaska News (Sept. 16, 2026), https://alaskanews.com/c/alaska-news/a-fishing-advocate-warns-kenai-over-an-undersea-cook-inlet-data-center (last visited Oct. 30, 2026)
[30] Qingxue Leng et al., *Impacts of Thermal and Cold Discharge from Power Plants on Marine Benthos and Its Mitigation Measures: A Systematic Review*, 11 Frontiers Marine Sci., art. 1465289 (2024), https://doi.org/10.3389/fmars.2024.1465289.
[31] *Id*.
[32] W. R. Lan et al., *Thermal Discharge Influences the Bioaccumulation and Bioavailability of Metals in Oysters: Implications of Ocean Warming*, 259 Env't Pollution, art. 113821 (2020), https://doi.org/10.1016/j.envpol.2019.113821.
[33] Alaska News*, supra* note 29.

D. Cumulative effects present ongoing harm to Cook Inlet beluga whales.

The Recovery Plan identifies the cumulative and synergistic effects of multiple stressors as a threat of high concern to Cook Inlet beluga recovery. The Recovery Plan also addresses cumulative impacts at length, stating that, "Although individual activities may be deemed insignificant when considered independently, creeping normality (e.g., death by a thousand cuts) can cause substantial adverse effects to nearly any entity, including [Cook Inlet] belugas, at both individual and population levels."[34] Furthermore, although "[a]pplications for Incidental Harassment Authorizations (IHAs) historically have been reviewed on the basis of an individual activity in isolation . . . the high level of human activity in Cook Inlet has increased such that cumulative effects of multiple activities must be appropriately accounted for."[35] This demonstrates the need to consider the cumulative impacts and noise on this population before approving even a preliminary permit.

However, the cumulative effects of numerous threats have remained shockingly under-studied. To prevent further decline of the species, FERC should deny the preliminary permit and similar permits until a more comprehensive assessment of the cumulative effects specifically on Cook Inlet belugas, related to noise, habitat degradation, chemical exposure, mortality, stranding, climate change, and migration of the species and its prey is complete.

Research indicates that rapid glacial melt and warming ocean conditions are altering prey availability and salinity patterns throughout the Inlet, further stressing belugas in areas overlapping proposed industrial operations. Arctic sea ice has consistently declined since 2005, and as of March 15, 2026, research by the National Snow and Ice Data Center found that the Arctic sea ice maximum for 2026 hit a record low of 14.29 million sq km, tied with 2025 for the smallest winter extent ever recorded, 1.36 million sq km below average.[36]

Federal response agencies address more than 150 oil and chemical spills in U.S. waters every year, underscoring the frequency and persistence of oil pollution in marine environments.[37] On January 26, 2024, Cook Inlet Energy released approximately 3,150 gallons of a water and 2% crude oil mixture at the West MacArthur River Unit Facility; however no final public evaluation of the incident has been made available.[38] Even smaller oil and gas spills can significantly threaten belugas and other marine life and

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[34] *Nat'l Marine Fisheries Serv.*, supra note 20, at VI-30.
[35] *Id.*
[36] "Arctic Sea Ice Record Low Maximum Strikes Again," *National Snow and Ice Data Center*, news release, accessed April 3, 2026, https://nsidc.org/news-analyses/news-stories/arctic-sea-ice-record-low-maximum-strikes-again.
[37] National Oceanic and Atmospheric Administration, n.d., Oil spill hazard restoration, https://response.restoration.noaa.gov/oil-and-chemical-spills.
[38] Alaska Division of Spill Prevention and Response, *Integrated Annual Report, Fiscal Year 2024* (2024) at 14, available at https://dec.alaska.gov/spar/reports/.

their habitat. In its Fiscal Year 2024, the Division of Spill Prevention and Response recorded 2,863 spill cases statewide in Alaska.[39] Such chronic exposure to toxic chemicals, combined with industrial noise, dredging, and consistent vessel traffic threatens these belugas and other marine life. Although little research has been conducted on the combination of effects linked to noise and oil and gas pollutants, the best available science demonstrates it poses a threat to the future survival and recovery of Cook Inlet belugas. Recent studies in mammals, including humans, have confirmed that noise and exposure to specific organic solvents have negative and synergistic physiologic impacts.[40]

These existing environmental conditions and the potential effects from the Project cannot be reasonably considered apart from the stressors already impacting Cook Inlet belugas. FERC should not evaluate the proposed turbines, subsea facilities, vessel traffic, and construction activities as isolated components without considering how their cumulative effects may affect belugas and other marine life.

Conclusion

Friends of Animals respectfully requests that FERC deny DeepGreen Cook Inlet SPV, LLC's application for a preliminary permit and refrain from issuing permits or authorizations for similar projects that would subject Cook Inlet beluga whales to further harassment or habitat degradation. The preliminary permit's feasibility-study purpose does not displace applicable analysis or protections under the National Environmental Policy Act, the Endangered Species Act, or the Marine Mammal Protection Act. FERC should not advance this speculative proposal on the premise that its environmental consequences can be addressed later.

These endangered whales should not have to endure another industrial intrusion into the waters they depend on for survival. Their protection and recovery must take precedence over speculative development, and their habitat must not become a testing ground for private interests and unproven technology.

Respectfully submitted,

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[39] Alaska Division of Spill Prevention and Response, *Integrated Annual Report, Fiscal Year 2024* (2024) at 31, available at https://dec.alaska.gov/spar/reports/.
[40] *Nat'l Marine Fisheries Serv.*, supra note 20, at III-8 (citing Peter Steyger, *Potentiation of chemical ototoxicity by noise*, 30 Seminars in Hearing 38-36 (2009)).

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Enclosures

Alaska Division of Spill Prevention and Response, *Integrated Annual Report, Fiscal Year 2024* (2024), available at https://dec.alaska.gov/spar/reports/.

Alaska News, *A Fishing Advocate Warns Kenai over an Undersea Cook Inlet Data Center*, Alaska News (Sept. 16, 2026), https://alaskanews.com/c/alaska-news/a-fishing-advocate-warns-kenai-over-an-undersea-cook-inlet-data-center (last visited Oct. 30, 2026).

Castellote, M. et al., *Anthropogenic Noise and the Endangered Cook Inlet Beluga Whale, Delphinapterus leucas: Acoustic Considerations for Management*, 80 Marine Fisheries Review 63-88 (2019), https://www.researchgate.net/publication/333356584_Anthropogenic_Noise_and_the_Endangered_Cook_Inlet_Beluga_Whale_Delphinapterus_leucas_Acoustic_Considerations_for_Management.

Lan et al., *Thermal Discharge Influences the Bioaccumulation and Bioavailability of Metals in Oysters: Implications of Ocean Warming*, 259 Env't Pollution, art. 113821 (2020), https://doi.org/10.1016/j.envpol.2019.113821.

Leng et al., *Impacts of Thermal and Cold Discharge from Power Plants on Marine Benthos and Its Mitigation Measures: A Systematic Review*, 11 Frontiers Marine Sci., art. 1465289 (2024), https://doi.org/10.3389/fmars.2024.1465289.

Marine Mammal Commission, *Alaska Marine Mammal Stock Assessments, Cook Inlet Stock* at 112 (2018), https://www.mmc.gov/wp-content/uploads/2018-Alaska-SAR-Cook-Inlet-Beluga-Whale.pdf.

Migura, M. & Bollini, C., *To take or not take? Examination of the status quo process for issuing take authorizations of endangered Cook Inlet beluga whales and implications for their recovery*, 4 Conservation Science and Practice e590 (2021).

National Marine Fisheries Service., *Recovery Plan for the Cook Inlet Beluga Whale (Delphinapterus leucas)* (2016), https://www.fisheries.noaa.gov/resource/document/recovery-plan-cook-inlet-beluga-whale-delphinapterus-leucas.

National Oceanic and Atmospheric Administration, n.d., Oil spill hazard restoration, https://response.restoration.noaa.gov/oil-and-chemical-spills.

National Oceanic and Atmospheric Administration Fisheries, *Beluga Whale: In the Spotlight*, https://www.fisheries.noaa.gov/species/beluga-whale/spotlight (last visited April 1, 2026).

National Oceanic and Atmospheric Administration Fisheries, *New Abundance Estimate for Endangered Cook Inlet Beluga Whales* (June 15, 2023), https://www.fisheries.noaa.gov/feature-story/new-abundance-estimate-endangered-cook-inlet-beluga-whales.

National Oceanic and Atmospheric Administration Fisheries, *NOAA Fisheries to Delay New Aerial Survey for Cook Inlet Beluga Whales Until June 2025* (June 14, 2024), https://www.fisheries.noaa.gov/feature-story/noaa-fisheries-delay-new-aerial-survey-cook-inlet-beluga-whales-until-june-2025.

National Oceanic and Atmospheric Administration Fisheries, *Species in the Spotlight Priority Actions 2021-2025, Cook Inlet Beluga Whale* (March 2021), http://media.fisheries.noaa.gov/2021-04/SIS%20Action%20Plan%202021_Cook%20Inlet%20Beluga-FINAL%20508.pdf.

National Oceanic and Atmospheric Administration Fisheries, *Vocal Repertoire of Cook Inlet Beluga Whales Documented for the First Time* (December 11, 2023), https://www.fisheries.noaa.gov/feature-story/vocal-repertoire-cook-inlet-beluga-whales-documented-first-time.

National Snow and Ice Data Center, "Arctic Sea Ice Record Low Maximum Strikes Again," *National Snow and Ice Data Center*, news release, accessed April 3, 2026, https://nsidc.org/news-analyses/news-stories/arctic-sea-ice-record-low-maximum-strikes-again.

Palsha R., 'Sloppy is the way I would describe this approach': Unknown plans for an underwater data center in Cook Inlet, 2KTUU AK News Source, last visited on Oct. 28, 2026, https://www.alaskasnewssource.com/2026/10/28/sloppy-is-way-i-would-describe-this-approach-unknown-plans-an-underwater-data-center-cook-inlet/.