



RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

June 30, 2026

Submitted via e-mail: dnr.water.regulation@alaska.gov

Brandon McCutcheon
Department of Natural Resources
Division of Mining, Land and Water
550 West 7th Avenue, Suite 1070
Anchorage, Alaska 99501

Dear Mr. McCutcheon:

The Resource Development Council for Alaska, Inc. (RDC) appreciates the opportunity to comment on the Department of Natural Resources' (DNR) proposed amendments to improve Alaska's water management regulations governing instream flow reservations under 11 AAC 93. RDC has long supported improvements that strengthen scientific decision-making, enhance regulatory certainty, and ensure Alaska's public waters are managed through a transparent, science-based process that serves the best interests of all Alaskans. For these reasons and the ones outlined below, RDC supports DNR's proposed regulation changes.

RDC is a statewide, non-profit trade association founded in 1975. Our membership is comprised of individuals and companies from Alaska's fishing, tourism, forestry, mining, and oil and gas industries and includes Alaska Native corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

Healthy fish populations and functioning aquatic ecosystems are essential to Alaska's economy and way of life. RDC supports responsible stewardship of Alaska's water resources and recognizes that healthy fisheries and responsible resource development are complementary objectives.

RDC has consistently supported a framework in which Alaska's public waters are managed by public resource agencies acting on behalf of all Alaskans. We believe instream flow reservation decisions should be made through a transparent public process that relies on the best available science and balances the broad public interest. The proposed regulations reinforce these



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principles by strengthening the State's role in administering instream flow reservations while improving consistency and transparency.

We are also encouraged by the proposed requirement for more robust, site-specific information to support instream flow reservation applications. Strengthening the information required for an application will help ensure public interest determinations are based on complete and objective data while providing greater predictability and confidence for all stakeholders. A rigorous, science-based process benefits both responsible stewardship of Alaska's water resources and the state's long-term economic competitiveness.

While RDC supports the overall direction of the proposed regulations, we encourage DNR to continue refining the final language where appropriate to ensure clear implementation and avoid unintended ambiguity. Continued refinement will further strengthen Alaska's water management program while preserving the regulations' central objectives.

Thank you for the opportunity to comment. RDC appreciates DNR's efforts to modernize Alaska's water management regulations and supports adoption of the proposed rulemaking.

Sincerely,

Connor Hajdukovich
Executive Director
Resource Development Council for Alaska



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