



June 30, 2026

Brandon McCutcheon  
Department of Natural Resources  
Division of Mining, Land and Water  
550 West 7th Avenue, Suite 1070  
Anchorage, Alaska 99501  
Submitted via e-mail: [dnr.water.regulation@alaska.gov](mailto:dnr.water.regulation@alaska.gov)

Dear Mr. McCutcheon,

The Alaska Chamber appreciates the opportunity to provide comments on the Department of Natural Resources' proposed amendments to 11 AAC 93 governing Alaska's water management program.

The Alaska Chamber is the state's largest statewide business advocacy organization. Our mission is to promote a healthy business environment in Alaska. The Chamber has more than 700 members and represents businesses of all sizes and industries from across the state, representing 58,000 Alaskan workers and \$4.6 billion in wages.

The Chamber has consistently supported thoughtful improvements to Alaska's water management program, particularly reforms related to the reservation of water process under 11 AAC 93.141- 147. We believe the proposed regulatory changes represent meaningful progress toward a more balanced, transparent, and scientifically sound framework for managing one of Alaska's most valuable natural resources.

Healthy fish populations, quality habitat, and reliable water resources are essential to Alaska's economy, culture, and way of life. Commercial, sport, and subsistence fisheries all depend on healthy waterways, and Alaska's resource industries equally depend on predictable and well-managed water resources. We firmly believe these interests are not mutually exclusive. Alaska has repeatedly demonstrated that responsible resource development and healthy fisheries can successfully coexist when decisions are grounded in sound science and balanced resource management.

The proposed revisions appropriately reaffirm that decisions regarding Alaska's water resources should remain with the state agencies charged with managing resources on behalf of all Alaskans—the Departments of Natural Resources (DNR), Fish and Game, and Environmental Conservation—as well as the appropriate federal agencies on federal lands. These decisions should be made through transparent public processes by agencies with broad statutory responsibilities, rather than organizations representing a single user group or viewpoint.

The Chamber particularly supports the proposed amendments requiring more robust, site-specific scientific analysis when evaluating instream flow reservations. Moving beyond generalized statewide assumptions to require data specific to the stream reach under consideration will improve decision-making, better account for local conditions, and allow DNR to balance fish habitat protection with the needs of upstream water users, consistent with Alaska law. Likewise, requiring measurable estimates of how varying flow levels affect available fish habitat strengthens the scientific foundation of these decisions while increasing transparency and public confidence in the process.



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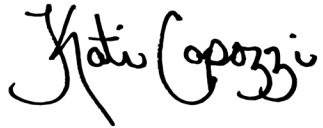


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The Alaska Chamber applauds DNR for advancing these long-awaited improvements to Alaska's water management regulations. The proposed amendments strengthen scientific rigor, improve transparency, preserve balanced resource management, and reinforce Alaska's longstanding commitment to responsible stewardship of both its fisheries and its natural resources.

Thank you for the opportunity to provide these comments and for your continued work to improve Alaska's water management program.

Sincerely,

A handwritten signature in black ink that reads "Kati Capozzi". The signature is written in a cursive, flowing style.

Kati Capozzi  
President and CEO