

**Alaska Department of Fish and Game  
AO360 Stakeholder Public Feedback Log**

<b>Commentor</b>	<b>Citation / Subject</b>	<b>Comments (summarized)</b>	<b>Agency Response</b>
<b>Nancy Hilstrand</b>	5 AAC 40 / Private Nonprofit Salmon and Shellfish Hatcheries	1) Reorganizing sections under Chapter 40; 2) Addressing similar section title activities and adding new sections; 3) Renaming Article titles to remove ambiguity; 4) Renaming arbitrary section titles; 5) Regulations guide strict comprehension for future audiences; 6) Reflecting statutory wild fish priority language; 7) Include ecosystem management and wild fish management with hatchery production; 8) Address hatchery fish straying in regulation; 9) Incorporate wild fish production into Management Feasibility Analysis; 10) Evaluate mix stock fisheries as part of an Economic Ecosystem Management Feasibility Analysis; 11) Specify authority between department and board authority; and 12) Require monitoring be paid for by hatchery operators.	We appreciate your engagement in the AO360 regulatory review process. All public input received during this phase will be carefully reviewed and assessed to determine how it may inform future regulatory revisions. Your recommendations will be considered as part of our broader effort to improve regulatory clarity, responsiveness, and alignment with statutory responsibilities and guidance for implementing AO360.
<b>Kachemak and Norton Bay Watershed Councils</b>	5 AAC 39.130 / Reports required of fishermen, processors, buyers, exporters, and operators of certain commercial fishing vessels  5 AAC 39.198 - Foreign fish processing permits	Maintain existing reporting requirements for accurate, timely reporting of harvests and transactions, which provides the foundation for sustainable management and enforcement. Reports provide data needed to prevent overharvest, monitor stock health, and safeguard long-term ecological and economic stability.  Ensure that foreign fish processing vessels can only operate when they do not undermine local processing capacity, ecological sustainability, or regulatory oversight. By tightly controlling access, the regulation prevents overexploitation and maintains Alaska's ability to manage its fishery resources responsibly.  Strengthen 5 AAC 39.130 and 5 AAC 39.198. By requiring comprehensive, standardized, and timely conservation strategy, reporting from every link in the commercial fishing chain, the regulation ensures that managers have the information they need to protect fish populations, ecosystems, and communities for generations to come.	We appreciate your engagement in the AO360 regulatory review process. All public input received during this phase will be carefully reviewed and assessed to determine how it may inform future regulatory revisions. Your recommendations will be considered as part of our broader effort to improve regulatory clarity, responsiveness, and alignment with statutory responsibilities and guidance for implementing AO360.
<b>Kachemak and Norton Bay Watershed Councils</b>	5 AAC 93 Miscellaneous Department Programs	Strengthen protections for threatened and endangered species and update state-level designations by adding Cook Inlet beluga whale, Steller sea lion, spectacled eider, and northern sea otter as endangered or threatened list in regulation.	We appreciate your engagement in the AO360 regulatory review process. All public input received during this phase will be carefully reviewed and assessed to determine how it may inform future regulatory revisions. Your recommendations will be considered as part of our broader effort to improve regulatory clarity, responsiveness, and alignment with statutory responsibilities and guidance for implementing AO360.

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<b>Kachemak and Norton Bay Watershed Councils</b>	5 AAC 40 / Private Nonprofit Salmon and Shellfish Hatcheries	Before a permit is issued, expand hatchery regulations into a comprehensive evaluation that analyses critical issues that affect the public trust and aquatic resources. Consider additional criteria including specifications for facility locations, food web, decision makers, local species and broodstock production, local ecosystems and markets, permit alteration process, fish processing capacity, exploitation rate, site specific impacts by species, eliminate economic, ecological, and competitive impacts, costs to the public for permit review, and report benefits to commercial fisheries limited entry permit holders.	We appreciate your engagement in the AO360 regulatory review process. All public input received during this phase will be carefully reviewed and assessed to determine how it may inform future regulatory revisions. Your recommendations will be considered as part of our broader effort to improve regulatory clarity, responsiveness, and alignment with statutory responsibilities and guidance for implementing AO360.
<b>Alaska Chamber of Commerce</b>	5 AAC 95.010 - .060 / Fish Habitat	Implement a “spill reporting” system similar to fuel systems to monitor incidents without requiring individual permits for each location.	We appreciate your engagement in the AO360 regulatory review process. All public input received during this phase will be carefully reviewed and assessed to determine how it may inform future regulatory revisions. Your recommendations will be considered as part of our broader effort to improve regulatory clarity, responsiveness, and alignment with statutory responsibilities and guidance for implementing AO360.
<b>Mike Kramer</b>	5 AAC 40 / Private Nonprofit Salmon and Shellfish Hatcheries	Incorporate Alaska Hatchery Research Program reports on straying and fitness to reduce straying and other negative impacts on wild stocks, including effect on the entire food web in the north pacific. Coordinate net rearing release timing for hatchery smolts to not have a negative impact on wild fish. Cap the number of fish that can be harvested for cost recover and broodstock.	We appreciate your engagement in the AO360 regulatory review process. All public input received during this phase will be carefully reviewed and assessed to determine how it may inform future regulatory revisions. Your recommendations will be considered as part of our broader effort to improve regulatory clarity, responsiveness, and alignment with statutory responsibilities and guidance for implementing AO360.
<b>Kachemak and Norton Bay Watershed Councils</b>	5 AAC 95 / Fish and Game Habitat	Maintain existing regulated activities and requirements for special areas (State Game Refuges, Critical Habitat Areas, and Sanctuaries). Modernize and expand the Catalog of Waters Important for the Spawning, Rearing or Migration of Anadromous Fish. Clarify and strengthen prohibited activities. Enhance protection and management of special areas with ecological science and standardize core protections. Improve permit procedures and transparency with procedures that benefit applicants and habitat protection; require written findings, review standards and a public permit database; address cumulative and long-term impacts based on the best available science and repeated activities triggering additional scrutiny; integrate watershed-scale planning. Integrate climate resilience into habitat protections to require consideration of climate-driven hydrologic changes in permit review, protect cold water refugia and groundwater streams, and climate adaptation strategies. Strengthen enforcement and compliance mechanisms to define penalties for non-compliance, post-project monitoring for high-risk activities, and clear authority for stop-work orders when habitat is threatened.	We appreciate your engagement in the AO360 regulatory review process. All public input received during this phase will be carefully reviewed and assessed to determine how it may inform future regulatory revisions. Your recommendations will be considered as part of our broader effort to improve regulatory clarity, responsiveness, and alignment with statutory responsibilities and guidance for implementing AO360.

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<b>Kenai River Professional Guide Association</b>	5 AAC 75.076 / Sport Fish Guiding Logbooks and Reports	End discriminatory restrictions on guided anglers related to area and timing in the Kenai River Special Management Area to not disadvantage on guided anglers (resident and non-resident) based on fisheries needs and not whether an angler uses guide services, consolidate guide registration into a single agency (Department of Natural Resources, State Parks only) by eliminating requirement for ADF&G registration, apply State Parks boat launch pass to all state park boat launches, eliminate requirements to carry physical documents and stickers on guide vessels, using the State Parks Guide Card as the primary identification.	We appreciate your engagement in the AO360 regulatory review process. All public input received during this phase will be carefully reviewed and assessed to determine how it may inform future regulatory revisions. Your recommendations will be considered as part of our broader effort to improve regulatory clarity, responsiveness, and alignment with statutory responsibilities and guidance for implementing AO360.
<b>Tom Paragi</b>	5 AAC 93.070 / Wildlife stocking	Update material adopted by reference to include 2010 policy that supersedes the 1995 policy in regulation.	We appreciate your engagement in the AO360 regulatory review process. All public input received during this phase will be carefully reviewed and assessed to determine how it may inform future regulatory revisions. Your recommendations will be considered as part of our broader effort to improve regulatory clarity, responsiveness, and alignment with statutory responsibilities and guidance for implementing AO360.
<b>Kit Culbert / Circle Seafoods</b>	5 AAC 39.130 / Reports required of fishermen, processors, buyers, exporters, and operators of certain commercial fishing vessels	Revise regulations for deliveries to Metlakatla to eliminate requirements for collecting a fish ticket for delivering ice; imprinting Commercial Fisheries Entry Commission permit number, estimates for total catch in pounds, and signature; submitting the fish ticket to ADF&G with an estimated final delivery weights on the fish ticket. The paper fish ticket requirement created situations where crewmembers were delivering paperwork short of the line at Annette Island, delaying deliveries and adding administrative burden to operations. Remove paper ticket requirement for deliveries to Metlakatla.	We appreciate your engagement in the AO360 regulatory review process. All public input received during this phase will be carefully reviewed and assessed to determine how it may inform future regulatory revisions. Your recommendations will be considered as part of our broader effort to improve regulatory clarity, responsiveness, and alignment with statutory responsibilities and guidance for implementing AO360.
<b>Salmon State / Wild Salmon Center</b>	5 AAC / Fish and Game	Carefully consider public trust duty and legal responsibility when determining whether to remove protective regulations or streamline processes that are designed to protect Alaska's public resources.	We appreciate your engagement in the AO360 regulatory review process. All public input received during this phase will be carefully reviewed and assessed to determine how it may inform future regulatory revisions. Your recommendations will be considered as part of our broader effort to improve regulatory clarity, responsiveness, and alignment with statutory responsibilities and guidance for implementing AO360.