



MEMORANDUM

TO: Mr. Casey Campbell
Executive Director/CEO
Prince William Sound Aquaculture Association
P.O. Box 1110
Cordova, Alaska 99574

DATE: November 28, 2018

FROM: Forrest R. Bowers, Acting Director
Division of Commercial Fisheries

SUBJECT: PWSAC Internal
Review Closure

Mr. Campbell,

In conjunction with ongoing evaluation and discussion of Alaska's salmon fishery enhancement program, the Alaska Department of Fish and Game revisited its 2006 Internal Review of Prince William Sound Aquaculture Association's hatchery program and determined the Internal Review is lacking a definitive statement of conclusion. This memorandum is meant to provide a brief synopsis of Internal Review background, steps taken in response to the Internal Review, status of the review, and Prince William Sound Aquaculture Association's compliance with statute, regulation, and policy.

Background

In 2006 the Alaska Department of Fish and Game (department) conducted a review of Prince William Sound Aquaculture Corporation's (PWSAC) hatchery programs. This review was prompted by what was described at the time as "an extensive record of ongoing problems" at PWSAC including exceeding permit levels, withholding required data, fishing outside special harvest areas, refusal to participate in straying studies, and inadequate reporting of roe sales, among other things. The review was critical of certain PWSAC actions and operations but supported its programs in general and recognized the importance of PWSAC's hatcheries to the State of Alaska.

The Internal Review was conducted to improve PWSAC's permit compliance and facilitate a discussion with PWSAC about department concerns. The most tangible outcome of the Internal Review and initial communications between the department and PWSAC was a document called the *Final Action Plan to Address Problems Identified in the Performance Review (5 AAC 40.860) of the Prince William Sound Aquaculture Corporation*. This Action Plan was provided to PWSAC in April 2007. While the Action Plan was specifically intended to outline expectations for PWSAC

hatchery operations, most of the conditions are no different than expectations for any hatchery program in Alaska.

Compliance with the Action Plan has served as the metric of progress toward a situation where the department is confident areas of concern raised in the Internal Review have been addressed by PWSAC.

Compliance with the Action Plan

Beginning in 2007, the department's Action Plan Review Committee annually documented PWSAC's efforts to address concerns identified in the Internal Review. Internal department memos summarized progress made on the Action Plan, acknowledged resolution of issues, and noted where problems persisted. The last Summary of Compliance with the Action Plan was written in March 2011 covering operations during the 2010 season. The Review Committee identified three remaining concerns at that time, all related to communications regarding broodstock numbers, none of which were identified as regulatory violations. Based on PWSAC's compliance with the Action Plan and improved communication with the department the Review Committee did not produce any additional Summaries of Compliance after March 2011.

Summary of actions related to the Action Plan

The department's intent throughout the Internal Review process was to improve permit compliance and communication with PWSAC and to closely monitor PWSAC compliance with hatchery permits, Fish Transport Permits, and Annual Management Plans (AMPs). The AMPs serve to guide and place conditions on hatchery operations for a calendar year; inclusion of department requirements for collection of specific biological data serves to notify the operator of specific needs and ensures the department clearly states what is requested. Inclusion of data-reporting requirements serves to clearly identify the data and form of delivery to both parties and secondly, to tie the communications and data delivery to a certain date. For example, both the department and PWSAC collect otolith mark-recovery information. Formal exchange of this data is specified in the AMPs, with the desired level of detail, as well as a deadline for exchange. Inclusion of this level of detail in the AMPs formalizes communication and data-exchange expectations for both parties. This has proven to be an effective method of communicating data needs and acquiring data. The department will continue to incorporate critical data needs in AMPs, not only for PWSAC, but for all permitted hatcheries.

To enhance communications, PWSAC created an *ex-officio* seat for department staff to serve as a nonvoting member of the PWSAC executive committee and board of directors. This step was invaluable in relationship building and facilitation of dialogue. Department staff also commonly attend other relevant PWSAC committee meetings, including Production and Planning, Finance, and Cost Recovery committees.

The Action Plan was a tool used by the department to fulfill its hatchery oversight and resource stewardship responsibilities. The Review Committee indirectly acted to monitor the department's oversight performance. In the process of conducting annual performance reviews, the department examined permit stipulation compliance, determined if AMPs were followed, reviewed production, release numbers, and salmon marking program performance. The Internal Review process and Action Plan demonstrate the department is providing oversight of hatchery operations and fostering practices to limit potential negative effects on wild salmon stock emanating from the salmon fishery enhancement program.

Current status of the internal review and action plan

Since early 2011 the department has considered PWSAC to be in compliance with its hatchery permits, basic management plans, AMPs, and other agreements with the department. Communication between the department and PWSAC has improved greatly since the Internal Review took place, and based on PWSAC's compliance with the Action Plan, the department considers the Internal Review closed.

Please feel free to contact me if you have questions or concerns regarding status of the PWSAC Internal Review.

Sincerely,

A handwritten signature in blue ink, appearing to read "Forrest R. Bowers", with a long horizontal flourish extending to the right.

Forrest R. Bowers
Acting Director
Alaska Department of Fish and Game
Division of Commercial Fisheries

cc:

Sam Cotten, Commissioner
Bill Templin, Chief Fishery Scientist
Sam Rabung, Aquaculture Section Chief
Bert Lewis, Regional Supervisor – Central Region