

To: Alaska Board Of Fisheries

- From. Curt Herschleb

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Thank you for the opportunity to testify. My name is Curtis Herschleb. I'm a year round resident of Cordova, Alaska. I have been making my living at various commercial fisheries in the Prince William Sound and Copper River Delta for over 40 year.s My wife has been teaching in the community for 25 years and we have two kids, one of which graduated from Cordova High School in 2021 and the other is currently a senior at CHS. I'm submitting this RC primarily regarding proposal 51.

My concern with the BOF taking action on 51 is based on the apparent fact that the primary questions regarding this proposal have neither been asked nor answered. Allow me to express in bullet points.

- Is this proposal allocative in nature? The answer has been avoided thus far, especially by the sponsor. Hopefully it will be addressed by the Board in deliberations. Regardless of the intent, it will have extreme allocative implications, especially in years of abundance.
- Does this proposal address a conservation concern? Answer; It has been suggested that early, discreet stocks of upriver fish have been over harvested and under escaped by longstanding management practices. These claims are unsupported by data. The Effort by the saltwater fleet has been reduced to a maximum of 48 hours in the month of May, even with generally positive indications, and shut down to next to nothing with poor harvest performance.
- Early community harvest permits executed by NVE and others have sometimes shown the presence of very early fish moving upriver without being counted or considered.
- How will this proposal impact ADF&G's ability to respond to managing the fishery moving forward? Answer: This would be a rigid regulation that ties the hands of ADF&G to respond to the vagaries of any given season and potentially result in unintended consequences such as over escapement of Reds into to Chinook spawning ares and loss of opportunity for the lower river users in times of abundance. Early harvest performance has always been a primary tool for the department to gage run strength. The department has shown it has the ability and willingness to use the tools at their disposal to achieve the escapement goals.

-For Management purposes, this proposal will remove the best early indicator of run strength, a valuable tool The ADF&G has always depended upon. This looks like a reallocation with the concurrent deletion of a traditional management tool. For this reason it should be viewed as a double negative for Board Action.

Thanks again, Curt Herschleb.