

Proposal 140 - Increase minimum commercial lingcod size limit to 30 inches from tip of snout, or 22.75 inches from front of dorsal fin, to tip of tail.

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1. The dorsal fin measurement used in the proposal has no bearing on the issue. It was an estimation by the proposers using what seemed to be a close ratio between a fish of 27" total length (tip of snout to tip of tail) and a fish of 30" total length. The dorsal fin measurement is only used in the commercial fishery to accommodate head-off landings. There is no equivalent limit in the sport fishery.
2. There were four main concerns the proposal was meant to address:
 - a. The inconsistency in the regulations as it might relate to conservation/protection of this valuable resource. What scientific/biological rationale drove the limits? Why the difference? Is there some other logic in play?
 - b. The impact on nest-protecting males, that tend to be smaller than females;
 - c. The impact on fecund females that tend to be larger fish;
 - d. The "interceptions" of fish in the ranges between 27 and 30 inches by the commercial fishery that would preclude recruitment into the sport fishery catch.
3. As the Department points out in their comments on the proposal it would "*potentially enhance spawning biomass of lingcod populations in Southeast Alaska...*" Department comments go on to say that the lack of a fecundity study make the amount of this potential increase unknown. The inference taken is that there would potentially be an increase. How much of an increase is unknown. Comments from the Department cite that the increase in size limit "*would decrease commercial lingcod harvest to some degree, more so in the directed and troll bycatch fisheries which are more likely to catch and land lingcod in this size range.*" It seems likely there is the possibility of a small, but short-term decrease in those fisheries as they adjusted to the new minimum size limit. No one from either of those fisheries spoke against the proposal during the Committee of the Whole meeting.
5. Commercial lingcod allocations are in pounds of fish. This proposal is not intended to affect commercial lingcod allocations in any way.
6. Processors should appreciate having larger fish, resulting in less handling and greater recoveries.

Charter operators currently live under slot limits with a lower limit of 30 inches. Upper limits of the slot vary by area. The fact that the sport minimum in all areas of Southeast Alaska is consistent at 30 inches, is notable. Why is the lower sport limit maintained at 30 inches throughout all of Southeast Alaska? Is there a universal conservation concern?

During comment period in the Committee of the Whole one of the proposers suggested that he would not be opposed to lowering the existing sport slot limits by 3 inches (top and bottom) to match the commercial lower size limit. In subsequent discussion with Department staff it was brought to light that reducing the lower slot limit for sport-caught lingcod has the potential for exceeding the sport allocation. Given that information any suggestion of tampering with the sport size limits for lingcod would not be advisable.