



Virginia Saltwater Sportfishing Association, Inc. (VSSA)
P.O. Box 28898, Henrico, VA 23228
<http://www.ifishva.org>
A Non-Profit 501-C3 Organization
Representing All Virginia Recreational Saltwater Anglers

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Dr. Roy Crabtree, NOAA Fisheries Regional Administrator, Southeast Region
And the Chairman, SAFMC Mackerel Committee
In Care Of: Kim Iverson, Public Information Officer
4055 Faber Place Drive, Suite 201
North Charleston SC 29405

Dear Sir,

March 3, 2016

We are writing to you about the situation on cobia and possible closures. The Virginia Saltwater Sportfishing Association (VSSA) is a growing organization of recreational fisherman in the Commonwealth of Virginia. Our mission includes representing the interests of Virginia's recreational saltwater anglers, ensuring the long-term sustainability of Virginia's fisheries, while protecting Virginia's marine, boat, and tackle industry jobs. We appreciate the great work SAFMC does for the protection of the species that they manage in the Atlantic.

Virginia recreational anglers do not support the closing down both Federal and State waters for cobia. It is our belief that the management policies that got us in this situation created an artificial notion that cobia stocks are in trouble. In 2014, the South Atlantic Fishery Management Council (SAFMC) split the Atlantic cobia stock into two zones, East Florida and Georgia to New York. Florida was allocated 830,000 pounds of the Annual Catch Limit (ACL), and only caught 351,829 pounds based on [NOAA's 2015 data](#). The Georgia to New York Zone only received 630,000 pounds of the ACL, and caught 1.541 million pounds. When combined under the old criteria, the ACL was only exceeded for the entire Atlantic by 300,000 pounds in a record season. Best case, the split was not reflective of the true size of the biomass of cobia in the Georgia-New York zone. Worst case, the artificially low ACL for Georgia to New York created by SAFMC would have been exceeded almost every year except for two or three of the worst seasons on record since 1990. The ACL does not reflect the true health of the cobia population.

On behalf of all the anglers in Virginia, VSSA respectfully requests the National Marine Fishery Service (NMFS) not establish a complete closure of recreational cobia fishing. Anglers are willing to consider lower limits, including low boat limits (3 or 4 per day, per boat) to ensure the cobia stocks remain healthy. Anglers are very dissatisfied with the decision to close a healthy cobia season as the result of one season's MRIP data with very low intercepts. In Virginia waters, the daily limit is one fish, per person, per day. Our experienced cobia anglers continue to tell us there are many cobia in our waters and see no evidence of overfishing or reduced stocks. A closure does not weigh the economic impact to the Virginia recreational fishery community and Magnuson-Stevens requires "to the extent practicable, minimize adverse economic impacts on such communities." If a closure for Federal waters is inevitable, please at least allow the states to establish policies of reduced limits that keeps our season open rather than a complete closure for both Federal and State waters.

If you have any questions or comments, the best way to contact us is through our website or email, ifishva@gmail.com, or my phone: 757-329-5137

Sincerely,

Mike Avery
Mike Avery, President