

Virginia Saltwater Sportfishing Association, Inc (VSSA)

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Mike Avery
President

Atlantic State Marine Fishery Commission
1050 N. Highland Street, Suite 200 A-N,
Arlington, VA 22201

Curtis Tomlin
Vice President

Kevin Smith
Treasurer

Brent Bosher
Secretary

Dear Mr. Daniels,

December 22, 2016

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.

VSSA, along with hundreds of cobia anglers in NC and VA, **strongly oppose ASMFC joint or complimentary management of cobia** for the following reasons:

Board of Directors

John Bello,
Chairman

Dr. Robert Allen

Mike Avery

Jerry Aycock

Brent Bosher

Jerry Hughes

Doug Ochsenknecht

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Murphy Sprinkle

Curtis Tomlin

- The notion of overfishing or exceeding the Annual Catch Limit (ACL) is artificially driven by the unfair, poorly executed zone split by SAFMC granting east Florida more than their fair share of the ACL leaving GA-NY with a small fraction of what should have been allocated. The numbers clearly reflect the true Atlantic coast is not being overfished by any significant amount. There is nothing the ASMFC can do to change this situation by getting involved.
- There are only 4 states that have a vested interest, GA, SC, NC, and VA. The other voting states in ASMFC have no interest in this matter so there is no reason to force all the other states along the Atlantic coast to vote. If anything, some of the other states will want their fair share of the unfairly allocated ACL exacerbating the problem even farther by ASMFC allocating an ever shrinking ACL to individual states.
- With ASMFC's authority to regulate catches in state waters, the angling public will no longer be able to influence our individual state commissioners to influence limits and seasons when the SAFMC clearly is not doing their due diligence in managing cobia.

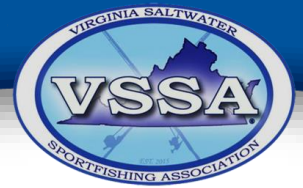
We respectfully request ASMFC halt any plans to jointly manage cobia with SAFMC. Once a new, fair, stock assessment is complete, then ASMFC should consider this action but not before. Additional information is enclosed.

If you have any questions, please contact me phone or e-mail, ifishva@gmail.com, or my phone: 757-329-5137.

Sincerely,

Mike Avery

Mike Avery, President



The PID makes a fundamental false assertion. The Denson/Darden South Carolina Department of Natural Resources study of cobia genetics cited by SAFMC, the PID, and the SEDAR 28 CLEARLY states "On the basis of a robust microsatellite data set from collections along the U.S. Atlantic coast (2008–09), offshore groups were genetically homogenous. However, the 2 sampled inshore aggregations (South Carolina and Virginia) were genetically distinct from each other, as well as from the offshore group."
<http://fishbull.noaa.gov/1121/darden.pdf>

Note, SEROs own genetics science in NO WAY substantiates the justification given for the management zone split given by SEDAR28 and SAFMC. It directly refutes the claim.

Migratory cobia being genetically homogeneous is supported by Dr. John Gold at Texas A&M (publicly available peer reviewed academically accepted research.) Instead of saying that there are two genetic groups of cobia in the Gulf and Atlantic, he indicated that, "Cobias that were sampled from the coastal waters of Virginia, Mississippi, and Louisiana were genetically homogeneous based on assays of microsatellite genotypes and mtDNA haplotypes. This finding is consistent with observed migration patterns and tag-and-release studies of Cobias."
<http://agrifecdn.tamu.edu/.../2012/05/Gold-et-al.-2013.pdf>

The basic fundamental issue that that the decision to split zones is based on something that is not true based on the best science available. Yet, here is the justification in the PID: "SAFMC management, based on current genetic information, addresses the management of Atlantic Migratory Group (AMG) of cobia that occur from Georgia through New York (Figure 1). Cobia that occur off the east coast of Florida are part of the Gulf stock, but the SAFMC manages the portion of that stock on the Florida east coast that occurs within its jurisdiction (Florida/Georgia (FL/GA) border to the Monroe County line). Tag recapture data suggested two main 3 stocks overlap at Brevard County Florida and corroborated the genetic findings."

The Magnuson Stevens Act MANDATES that the regional commissions use the best science available. Clearly SAFMC and SERO have not. Before ASMFC completes a complimentary fisheries management plan, SAFMC must complete the stock ID workshop and stock assessment (currently scheduled for 2017 and 2018 respectively) to correct this issue. Only then would it be appropriate for complimentary management. Our recommendation is that ASMFC immediately stop any development of a fisheries management plan until SAFMC has completed the new stock ID workshop and stock assessment so the resulting ACL and allocation appropriately reflects the best science available.