



July 7th, 2024

Emilie Franke
FMP Coordinator
1050 N. Highland Street
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Arlington, Virginia 22201

RE: ASGA Comments on Draft Addendum II to Amendment 1 to the Interstate Fishery Management Plan for Atlantic Cobia

Dear Ms. Franke and Members of the Cobia Board,

The American Saltwater Guides Association thanks you for consideration of the following comments on Draft Addendum II to the Cobia IFMP. ASGA represents conservation-minded fishing guides, private anglers, and fishing-related businesses who believe in “Better Business through Conservation” and support the promotion of resource-first, science-based, and risk-averse management strategies that ensure the long-term sustainability of marine fisheries and fishing-dependent coastal communities.

For our members and the recreational angling community, cobia are an increasingly important species that, when seasonally available, offer high-quality fishing experiences. The thrill and challenge of sight-casting a 50” cobia is a huge draw for this fishery, and is the predominant method used by our membership. While some of the fishing guides we represent are highly specialized in the cobia fishery, some aren’t and target cobia when locally available and/or incidentally encounter the species. Anecdotally and according to surveys, cobia are moving northward—cobia landings and catches are shifting northwards too—likely a climate change impact. Anglers in New Jersey and New York can now reliably target cobia, and that opportunity may continue to expand to other states like Connecticut and Rhode Island. However, infrequent stock assessments, limited applied academic research, and inherent challenges in collecting recreational data leave us with huge gaps in our collective understanding of Atlantic cobia and hinders our ability to effectively and sustainably manage this stock.

The primary objective of Draft Addendum II is to consider new recreational harvest allocation strategies and address data uncertainty concerns. ASGA commends the ASMFC Coastal Pelagics Management Board for taking up this management action and earnestly working toward addressing the numerous management challenges with this fishery. For species like Atlantic cobia that are overwhelmingly recreational—96% of harvest allocated to the recreational sector—managers and scientists must grapple with immense uncertainty. The reality of discovering potentially 30-40% overestimation biases in the Federal Effort Survey portion of the Marine Recreational Informational Program further exasperates this challenge.

ASGA’s primary interest in providing input on Draft Addendum II is for ensuring the long-term sustainability of Atlantic cobia; however, the strategies in this document to address recreational data problems and managing a highly dynamic species exhibiting climate change impacts affords

potential lessons learned for applications in other fisheries and regions. In general, ASGA supports alternatives in this document that seek regulatory consistency, effectively capture Atlantic cobia's current distribution, and leverage methods to improve the PSEs of fishery data for management while not sacrificing accountability or sustainability.

As noted above, NOAA Fisheries is currently undergoing a pilot study to confirm potential overestimation biases in MRIP and is concurrently engaged in a re-envisioning process for the recreational data collection enterprise nationwide. While some may have preferred to table Draft Addendum II until new recreational catch and effort estimates are available, ASGA is supportive of progressing forward and reevaluating in the future should new estimates become available. However, ASGA was somewhat disappointed that this document fails to consider innovative or alternative tools to address the persistent recreational data issues that are perverse within Atlantic cobia. As an example, it would have been interesting to gather public input on ideas such as harvest reporting and/or how emerging fishing application technology could improve cobia management. While Virginia's mandatory reporting program was unfortunately abandoned, ASGA remains interested in the idea of leveraging angler catch reporting—voluntary or mandatory—on a coastwide basis to address the data uncertainties with cobia (pulse, rare-event, predominantly recreational by boat). In addition to gauging the public's interest on those ideas, gathering technical input on the potential utility of such data streams would have been a productive exercise.

ASGA's Preferred Alternatives for Draft Addendum II:

- Section 3.1 Recreational Allocation Framework: **Option D-Coastwide**
 - The number one issue in cobia management is recreational data—MRIP is notoriously ineffective at capturing pulse, rare-event species targeted by boat, and managing off state-by-state estimates only worsen data quality in this fishery; managing cobia on a coastwide basis would substantially reduce the data uncertainties and make far better use of the available data. Additionally, ASGA supports the coastwide approach, as we believe it best captures the dynamic nature and observed distribution shifts of this fishery.
 - The Coastwide framework also negates the complexity and questionable effectiveness of *de minimis* determinations.
- Section 3.2 Updates to State/Regional Allocations: **N/A**
 - While the selection of the Coastwide Allocation alternative appears to make this option-set unnecessary, ASGA is concerned about how new MRIP estimates may impact cobia management and the Coastwide Harvest Target. In general, ASGA supports affording ASMFC management boards with the authority to quickly respond to new information to sustainably manage fisheries, but the subject of allocation should warrant enhanced participation and input. That being said, the controversial nature of allocation actions may be similarly smoothed by reliance on a coastwide allocation/harvest target.
- Section 3.3 Data and Uncertainty with Recreational Landings Evaluations: **Option A- 3 year**
 - We understand the intention and effect of moving to a five-year harvest evaluation—it would smooth out potential MRIP variance/outliers and produce a more *realistic* harvest estimate. However, we are concerned that that length of time in-between formal evaluations may miss a new emerging trend in the fishery and trigger a management

reaction too late. Three years remains an effective timeframe to evaluate recreational harvest estimates, react if necessary, and smooth out MRIP data. Additionally, we are interested and see the merit in the confidence interval approach but would have preferred this be its own standalone option set to solicit public input. As an example, what are the Technical Committee's thoughts on this, is 95% the optimal CI? Regardless, moving from point estimates to a CI would be an improvement in how we utilize the available recreational data to sustainably manage this unique fishery.

- Section 3.4 Overage Response for Recreational Landings Evaluations: **Option A, Status Quo**
 - Even with the improvements to data quality and how that data is used, accountability must be maintained.
- Section 3.5 Timeline for Setting Commercial and Recreational Measures: **Option A, Status Quo**
 - Like other alternatives, we understand the rationale for extending specification periods/measures to avoid “management whiplash.” However, we fear five-year specifications may be too long of a timeframe. One of the other stated benefits of the five-year is its alignment with the stock assessment—that benefit may be overstated in this fishery. It is our understanding that the cobia assessment has very limited indices for the species outside of MRIP data. Therefore, we believe maintaining the three-year specifications period, while still considering assessment information when it becomes available, is the best course of action.

ASGA appreciates the CMP Board's work to address the challenges within the Atlantic cobia fishery, and we look forward to working with the ASMFC to tackle these and other challenges facing the recreational fishing community. Please reach if you have any questions or if we can be helpful in any other way.

Sincerely,



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