

The decision to close the cobia season June 20th in the states north of Florida especially North Carolina and Virginia will have a huge economic impact and put many people out of business. Me along with quite a few others have been looking into the numbers and science behind the closure and most of it is very troubling. In 2015 the SAFMC decided to split the ACL for cobia between Florida and the States north of Florida (GA-NY). First off there reasoning behind this from what I was told by Kari MacLauchlin is that biological DNA testing from 1971-present has proven that the cobia stock in Florida are different from the GA-NY stock. Looking back on previous record there is 0 data for cobia in Virginia before 1996 so that lack of knowledge alone is enough to raise a red flag. On top of that there is record of fish that were tagged in Florida being recaptured off the coast of NC and in the Chesapeake bay. This split of the ACL ultimately is what caused this season closure issue to arise. That being said even with the ACL Split the numbers do not add up. The lack of knowledge of the cobia in the NC/VA area is overwhelming. There is no tagging system in place to track these fish in the NC/VA region. The annual catch numbers for cobia for each region are essentially based off of an equation where recreational catches are estimated from the commercial catch in proportion to the the estimated biomass weight for the population. A population which includes Cobia from all zones. There are also a lot of 0s or blanks in the data history of cobia for Virginia and North Carolina for the last 15+years. For the SAFMC to make such a irrational decision to close down the cobia season for Recs and Charters, which will be detrimental to the life's of many Captains and Lure company's in the North Carolina - Virginia area, with the lack of adequate data is completely wrong. The simple fact that this closure comes the first year after a major ACL adjustment is troubling enough. There should be atleast a 3 year data collection after the ACL changes before any major closure, that will have such a huge impact, should be able to take place. Hundreds of hard working men and women in Virginia and North Carolina are going to suffer from the affects of this closure. It should not be allowed for the season for a migratory fish to be closed in a way that will not affect all states or regions equally. This closure will limit NC to around 3 weeks of cobia fishing and even less in Virginia. While states like Florida are completely unaffected. NOAA and the SAFMC needs to improve the data collection for cobia especially in the GA-NY region. It is completely unrealistic that a state such as virginia can go from having an annual catch of 30,000 of cobia to over 800,000 in just a few years. There are far better solutions that would benifit the fishery, and would not completely destroy the inshore cobia charters and these company's that support them such as lure makers and tackle stores. A simple solution would be to impose a Vessel limit on cobia in all states and federal waters of 5 fish per day. That way charters would still be able to fish for cobia and take home 5 fish per day, but it would stop boats from going out with multiple groups each day and keeping there personal limit. This coupled with the drop from 2 to 1 per person in federal waters and in states that were at 2 per person and have now lowered to 1 per person would have a huge positive impact on the fishery. I hope my comment helps, and that there is a way we can get our fishery back and help in improving the data collection for cobia in the GA-NY region so this doesn't have to happen in the future.

Thank you,
Travis Kemp