



Atlantic States Marine Fisheries Commission

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MEMORANDUM

TO: Coastal Pelagics Management Board
FROM: Cobia Plan Development Team
DATE: April 15, 2024
SUBJECT: Cobia Draft Addendum II Discussion Points

In October 2023, the Coastal Pelagics Management Board (Board) initiated an addendum to address reallocation of recreational cobia quota based on more recent harvest data. In January 2024, the Board provided additional guidance to the Plan Development Team (PDT) for the draft addendum to consider alternatives to the current state-by-state allocation system, the process for updating allocations in the future, and uncertainty around harvest estimates.

The PDT developed those options which are included in Draft Addendum II in the Board's meeting materials for the 2024 Spring Meeting.

This memorandum highlights PDT discussion and additional context on some topics for the Board's consideration, including a PDT recommendation to narrow the scope of regional allocation options.

Allocation Frameworks and Cobia Management Challenges

Each type of allocation framework considered in the draft addendum (state-by-state, regional, or coastwide) has both benefits and challenges. While a regional or coastwide allocation framework could address some of the uncertainty concerns by pooling data into larger sample sizes, these approaches would require coordination between states to determine a uniform set of management measures (uniform size limit and vessel limit; seasons may vary) across regions or the coast. Underlying all types of allocation frameworks are imprecise recreational harvest estimates due to the pulse/rare event nature of the cobia fishery, as well as cobia seasonal migration dictating when fish are available along the coast. Additionally, the Interstate Fishery Management Plan (FMP) for Atlantic Migratory Group Cobia is relatively new, with the FMP originally approved in 2017 and the transition to sole Commission management approved in 2019. The Board only has a few years of sole Commission management to inform potential changes to the allocation framework.

COVID-19 Data Years

At the January 2024 Board meeting, the Board decided to exclude 2020 from allocation calculations due to the lapse in MRIP sampling and use of imputed data. The Board directed the PDT to consider whether 2021 should be excluded as well. The PDT considered that the Access Point Angler Intercept Survey (APAIS) resumed in all states prior to 2021, but the return to at-

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sea head boat sampling was delayed into 2021. However, catch by head boats represents less than 0.1% of cobia catch over the last decade, so the PDT was not concerned about this. Additionally, while a high percentage of imputed data was used for 2020 catch estimates, only a very small percentage of data was imputed for 2021 catch estimates for one state (Virginia's 2021 catch estimate includes two imputed data points accounting for 0.02% of the harvest that year).

Since most sampling resumed prior to 2021 and only a very small portion of 2021 catch data was imputed for cobia, the PDT decided to include 2021 in the allocation timeframes.

State-By-State Allocations based on Recent Data

As shown in Table 2 of the draft addendum, the options for updated state-by-state allocations would result in significant changes to state allocation percentages. Virginia's allocation could increase from 39% to 69%; North Carolina's allocation could decrease from 38% to 13%; South Carolina's allocation could decrease from 12% to 6.5%; and Georgia's allocation could decrease from 9% to 6%. The PDT acknowledges the magnitude of these changes, which are primarily driven by Virginia's increased proportion and North Carolina's decreased proportion of the total harvest in recent years. The PDT discussed whether a phase-in approach to these potential allocation changes would be appropriate (i.e., incrementally change the allocations each year until the new allocation is reached). However, the PDT does not recommend a phase-in approach because this would result in constantly changing state harvest targets and associated state measures. This would lead to management 'whiplash' and a lack of consistency in recreational measures from year to year, which is what the Board noted it is trying to avoid.

Regional Allocation Options

The draft addendum includes options for four different regional definitions, including options for a two-region or three-region approach and options for whether to include North Carolina in the northern or southern region.

A three-region approach would result in a northern region comprised of states from Rhode Island through Delaware with a regional allocation of less than 2% of the total recreational quota. All of these states are currently *de minimis* states with variable, sporadic landings from year to year and associated percent standard errors (PSEs) typically greater than 80. The PDT noted concern about having a region comprised of only *de minimis* states with such a small percentage of the quota and high PSEs, and therefore **the PDT recommends the Board remove the three-region allocation options from the draft addendum and only consider a two-region approach.**

The draft addendum includes two alternatives for a southern region. The first is a southern region comprised only of South Carolina and Georgia, which would result in North Carolina being grouped with Virginia (and other northern states). This grouping was used by the Cobia

Technical Committee in their September 2023 report¹ based on tagging data and observations on the water suggesting cobia in North Carolina and Virginia represent the same group of fish. However, the PDT noted that when considering the timing of cobia harvest throughout the year, North Carolina's peak harvest occurs in May/June similar to South Carolina and Georgia's peak harvest (Figure 1). Based on this, the PDT added the second southern region alternative to the draft addendum with North Carolina grouped with South Carolina and Georgia.

Virginia's peak harvest occurs in July/August, at least in part due to their season not opening until June. When considering the timing of cobia catch (harvest and releases) throughout the year, the differences between North Carolina and Virginia are less significant with catch in both states more evenly distributed from May through August (Figure 2).

The PDT recommends the Board consider whether it has a preferred grouping for North Carolina. If so, the non-preferred grouping can be removed from the draft addendum.

The PDT discussed potential considerations for the different regional groupings. If North Carolina is grouped in the southern region with South Carolina and Georgia, then the northern region would be comprised of Virginia plus states with *de minimis* status. This grouping may not necessarily improve PSEs relative to Virginia's current PSEs because the *de minimis* states have such high PSEs and sporadic landings. However, Virginia's PSEs are the lowest of all cobia state harvest estimates with most recent PSEs below 30.

In general, the concern about high PSEs and high uncertainty will not be completely solved by moving to a regional allocation, though there may be some improvement.

Rolling Seasons

The Board's original motion initiating this addendum noted the options should "*consider the need for fishing opportunity based on the seasonality of the species in various regions*". This concept was referred to as 'rolling seasons' meaning the fishery would open and close sequentially along the coast following the cobia seasonal migration. The PDT considered whether the addendum should specifically prescribe season dates to address this concept. After discussion and development of the regional and coastwide allocation framework options, the PDT determined there is no need to prescribe season dates at this time since active fishing seasons are already dictated by cobia availability in a rolling fashion (e.g., peak harvest at the southern end of the range is during May/June and peak harvest at the northern end is during July/August). For the regional and coastwide framework options, the addendum affords flexibility for seasons to differ between states in the same region or along the coast based on cobia availability, with the potential for season changes, if needed, to accomplish either reductions or liberalizations in the future.

¹ Sep 2023 Cobia Technical Committee report:
http://www.asmf.org/uploads/file/65baa5f1CobiaTC_Report_2024MgmtMeasures_Sept2023.pdf

Uncertainty and Confidence Intervals

At the January 2024 Board meeting, Board members noted the need to account for the uncertainty of MRIP harvest estimates and alluded to approaches used for other species (e.g., percent change approach for summer flounder, scup, black sea bass, and bluefish). The percent change approach² for those other species takes into account both the confidence intervals associated with the harvest estimate and the status of the stock to determine how to change measures. The PDT developed a provision for the draft addendum based on the confidence intervals of cobia harvest estimates to account for the uncertainty of point estimates (i.e., harvest could be above or below the point estimate). However, the PDT did not include a biological status of the stock component to the approach. The species for which the percent change approach is applied typically have stock assessments conducted every two years, so there is a regularly updated data stream for biological indicators of stock status. At this point, cobia stock assessments are conducted roughly every five years, and currently it is unclear what (if any) abundance index can be developed for cobia. Given these uncertainties surrounding the timing of cobia stock assessments, the PDT did not consider adding a biological stock status component to the recreational harvest target evaluation process.

² Explanation of Percent Change Approach for Summer Flounder, Scup, Black Sea Bass, and Bluefish: <https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/62a790313537284dee967d85/1655148593447/HCR-Percent-Change-Table.pdf>

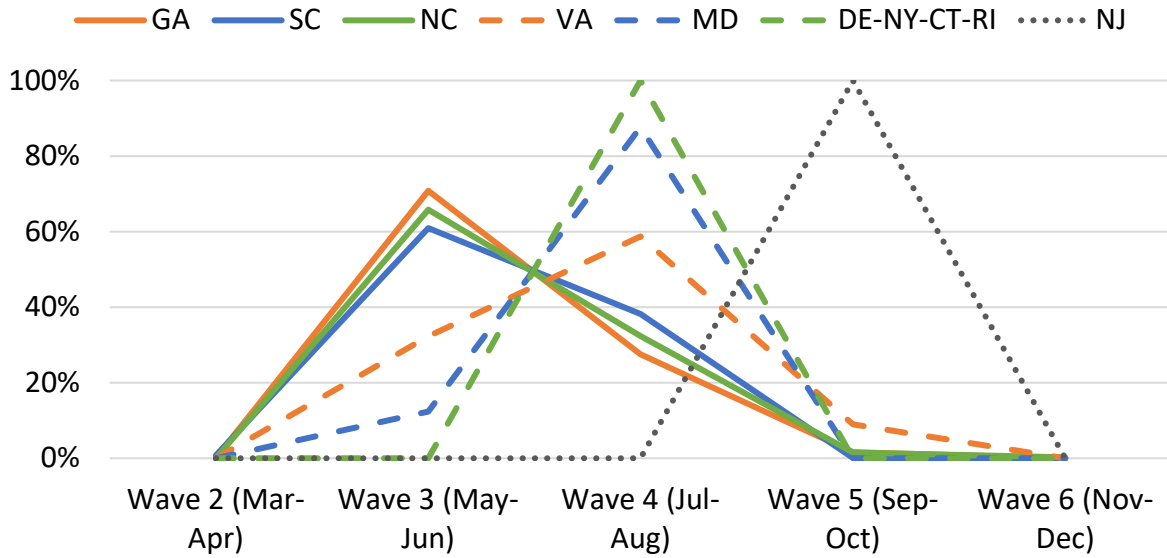


Figure 1. Percent of harvest of Atlantic cobia in numbers per wave from 2018-2023 (excluding 2020). *2023 data are preliminary. Note: MRIP sampling does not occur during Wave 1 (Jan-Feb) except for in North Carolina. North Carolina’s estimated cobia harvest during Wave 1 for this time period was 0 fish.

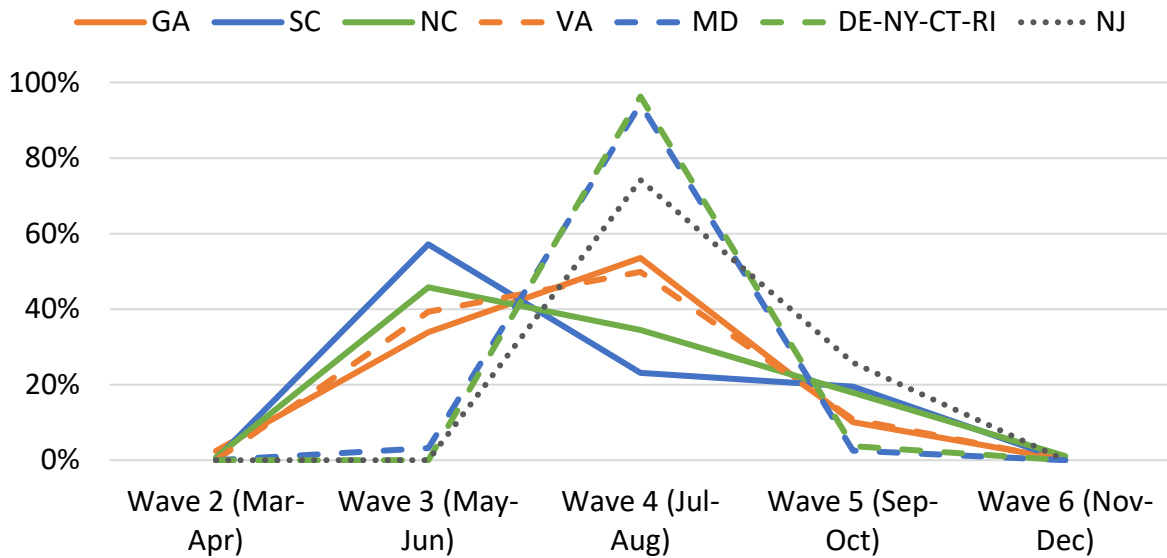


Figure 2. Percent of catch of Atlantic cobia in numbers per wave from 2018-2023 (excluding 2020). *2023 data are preliminary. Note: MRIP sampling does not occur during Wave 1 (Jan-Feb) except for in North Carolina. North Carolina’s estimated cobia harvest during Wave 1 for this time period was 0 fish.