

**From:** [Robert E. Rutkowski](#)  
**To:** [Comments](#)  
**Cc:** [Keith Abouchar](#)  
**Subject:** [External] Horseshoe crab management proposal could further imperil threatened red knot shorebird  
**Date:** Wednesday, January 19, 2022 1:38:45 PM

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Atlantic States Marine Fisheries Commission  
1050 N. Highland Street, Suite 200 A-N  
Arlington, VA 22201  
[comments@asmfc.org](mailto:comments@asmfc.org)

Re: Horseshoe crab management proposal could further imperil threatened red knot shorebird

A coalition of conservation groups has warned regional fishery managers that a proposed change to the rules governing horseshoe crab removal in Delaware Bay threatens the red knot, a declining migratory shorebird whose numbers along the bay reached a record low last spring.

In a letter submitted on January 18, the groups informed the Commission that its proposed revision to the management of horseshoe crabs in Delaware Bay would likely result in a violation of the Endangered Species Act. The groups explained that the proposal would likely lead to lifting the prohibition on the killing – or “harvesting” – of female horseshoe crabs for use as fishing bait. Horseshoe crab eggs are a crucial food source for the red knot.

Red knots make one of the most epic migrations in the animal kingdom, starting as far south as Tierra del Fuego and flying more than 9,000 miles to their breeding grounds in the Arctic Circle. For most red knots, Delaware Bay is a critical resting point to replenish and renourish with horseshoe crab eggs before finishing their journeys, enabling a rapid doubling of their body mass.

In recent decades, the harvest of horseshoe crabs has significantly impacted the supply of eggs awaiting red knots. In 2021, the peak count of red knots along Delaware Bay reached a record low, while the estimated Delaware Bay horseshoe crab population has also remained at historically low levels.

The Commission is scheduled to vote on the proposed revision on January 26, without giving the public any meaningful opportunity to review or weigh in on the changes.

The Commission should not proceed with the proposed revision and ensure an adequate food supply for red knots during their annual migration.

With the red knot in such a dire state, unprecedented emergency measures are plainly warranted. Instead, the Commission is poised to further reduce protections, hastening the species’ march toward extinction. Regulators can and must do better for this magnificent bird.

Horseshoe crabs are a keystone species in the near shore tidal ecosystems of Delaware Bay, providing critical food resources for the federally threatened shorebird, the red knot, as well as ecologically

valuable sport and forage fish species. A change in the Commission's harvest package that allows the harvest of female horseshoe crabs in the Delaware Bay region will further exacerbate population viability of red knots and important marine organisms.

The Commission must not allow red knots to travel thousands of miles only to starve on the shores of Delaware Bay. As a threatened species, the red knot is entitled to protections under the Endangered Species Act. We have already seen the population of red knots plummet, and the proposed revision would likely exacerbate the decline of this magnificent bird.

Coalition's letter:

[https://defenders.org/sites/default/files/2022-01/DOW\\_EJ\\_NJA\\_commentsrehscframeworkrevision.pdf](https://defenders.org/sites/default/files/2022-01/DOW_EJ_NJA_commentsrehscframeworkrevision.pdf)

Yours sincerely,  
Robert E. Rutkowski

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**From:** [Kathryn Nguyen](#)  
**To:** [Comments](#)  
**Subject:** [External] Short-sighted "solution" is actually detrimental.  
**Date:** Friday, January 21, 2022 10:19:36 AM

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Dear Commissioners,

Please be advised that allowing the harvesting of female horseshoe crabs as bait is a short-sighted plan that will harm the East coast marine environment.

It is backwards thinking to be reducing the biological reproduction of horseshoe crabs who's eggs are a vital component to the base of an extensive food web. Given the enormous stressors humans already impose on our costal marine ecosystem, knowingly exacerbating the demise of native species (and by extension migrating species) populations is against sound environmental principles.

Sincerely yours,

Mrs. Kathryn Nguyen

"Environment Expert" -NJ BOE  
East Brunswick Sustainability Task Force, founding member  
Author: The Sustainably Curriculum for Schools