

February 29, 2024

Daniel McKiernan

Director, Division of Marine Fisheries Email TBD

Dear Director McKiernan,

I am writing on behalf of Friends of Chatham Waterways, an important local non-profit based in Chatham, MA. We strongly urge you to move forward proposed legislation to strengthen the protection of horseshoe crabs, especially ending the use of horseshoe crabs for whelk bait. In addition, we hope you will take a step further and encourage the pharmaceutical industry to accelerate alternative means of production of limulus amebocyte lysate and, in the interim, introduce stronger measures to reduce mortality in crabs which are bled.

Friends of Chatham Waterways was founded in 1983 as a non-profit organization committed to the protection, wise use and enjoyment of Chatham's fresh and salt waterways and adjoining lands. The primary interest of FCW is ensuring that the management of Chatham waterways is accomplished in ways that are compatible with the conservation of the community's natural resources and the character of the area. We represent 300 members, all of whom have a direct interest in Chatham waterways.

The horseshoe crab is one of Massachusetts' most iconic and ancient animals, and a critical lynchpin species. They have survived since before the dinosaurs, and yet we are now seeing a significant depletion of their populations as a result of their use as bait for whelks and high mortality resulting from bleeding for the pharmaceutical industry. Chatham is a critical stopover for migratory birds, and the very reason the Monomoy National Wildlife Sanctuary was established by the federal government in 1944. We see firsthand how important horseshoe crabs are for the broader ecosystem. They are essential for migratory birds making their long journey to and from nesting habitats, including the endangered red knot. Our members highly value horseshoe crabs and believe action should be taken for their protection.

These regulations would be an important first step in restoring depleted local populations. In addition, our ultimate goal should be phasing out the harvest of horseshoe crabs for bait in the whelk fishery, which is already classified as overfished. Continuing the bait harvest contributes to the overexploitation of not one, but two valuable marine species.

Every other state on the East Coast with a significant horseshoe crab population has taken measures to restrict harvesting during the spawning season or end bait harvest altogether. It's past time for Massachusetts to catch up.

We strongly encourage your approval of this measure.

Respectfully,

Kristin Andres, FCW President