



Andrew Gottlieb  
Executive Director

February 22, 2024

**BOARD OF DIRECTORS**

Steven Koppel  
President

Daniel McKiernan, Director  
Division of Marine Fisheries  
Sent via email to [marine.fish@mass.gov](mailto:marine.fish@mass.gov)

Elysse Magnotto-Cleary  
Vice President

**RE: Support for Proposed Horseshoe Crab Regulations**

Taryn Wilson  
Treasurer

Dear Director McKiernan:

Jack Looney  
Clerk

The Association to Preserve Cape Cod (APCC) writes in strong support for the horseshoe crab protections proposed by the Division of Marine Fisheries.

Bob Ciolek

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Founded in 1968, APCC is the Cape region's leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect, preserve and restore Cape Cod's natural resources. APCC focuses our efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.

The proposal by the Division of Marine Fisheries to ban the harvest of horseshoe crabs during their spawning season is essential for the protection and continued survival of this critically important species, and its adoption and implementation is long overdue. The once-abundant population of horseshoe crabs in Massachusetts has become significantly depleted.

Shorebirds, including those that are listed by the Commonwealth and the federal government as threatened species, depend on horseshoe crab eggs as a vital food source during their annual migrations. Adopting a ban in Massachusetts on horseshoe crab harvesting during spawning season is a necessary first step in helping ensure a reliable food supply for shorebirds as they stop to rest and refuel on their yearly journey. Unfortunately, Massachusetts has fallen behind in this regard; every other state on the East Coast with a significant horseshoe crab population has already taken measures to restrict harvesting during the spawning season.

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Ultimately, the goal of the Division of Marine Fisheries should be to completely phase out the harvest of horseshoe crabs for use as bait in the whelk fishery, a species that has already been classified as overfished. The continuation of the horseshoe crab harvest for bait contributes to the overexploitation of both horseshoe crabs and whelks, in addition to placing undue stress on vulnerable shorebird species.

APCC urges the Division of Marine Fisheries to move swiftly in adopting the proposed harvesting ban regulation as a first important step in restoring horseshoe crab populations in Massachusetts.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'A' followed by a long horizontal line.

Andrew Gottlieb  
Executive Director



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