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March 4, 2026

Dan McKiernan  
Director, Massachusetts Division of Marine Fisheries  
[submitted via email: [marine.fish@mass.gov](mailto:marine.fish@mass.gov)]

**Re: Comments on the Massachusetts Division of Marine Fisheries Draft Horseshoe Crab Quotas for 2026**

Dear Director McKiernan,

The Association to Preserve Cape Cod (APCC) writes with strong concern regarding the Division of Marine Fisheries' (DMF) proposal to reduce the 2026 horseshoe crab bait quota from 140,000 to 100,000 horseshoe crabs and increase the biomedical quota from 200,000 to 280,000. We respectfully ask the DMF to reconsider and revise this proposal.

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.

Horseshoe crabs are a fascinating and ancient species that play a critical role in coastal ecosystems. Their eggs are a vital food source for local and migratory shorebirds, as well as for many other important marine species. Their unique blood has also been used for endotoxin testing to ensure the safety of medical products and vaccines.

Despite their scientific and ecological importance, horseshoe crab populations have plummeted to dangerously low levels in recent decades due in part to commercial bait harvesting for the whelk and eel fisheries. This decline of the horseshoe crab population has significant consequences for the entire ecosystem, including many commercially important fish and shellfish species. Your own agency has classified the whelk fishery as "depleted and overfished, with overfishing continuing." DMF data also suggests that demand for bait crabs from whelk harvesters is below 100,000 animals per year. Other advantageous bait sources exist, such as the invasive green crab, which are abundant in Massachusetts waters and which have adversely impacted the shellfish industry.

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Given that DMF's own quota proposal acknowledges declining bait demand while expanding the number of horseshoe crabs used for biomedical purposes, and that horseshoe crabs have not fully recovered statewide, this is an appropriate moment to end the use of horseshoe crabs for bait.

In addition, recognizing that synthetic alternatives to horseshoe crab blood now exist for biomedical use, we recommend that DMF consider decreasing the biomedical quota below the 2025 level of 200,000 and certainly not increase it to 280,000.

The time to wind down the exploitation of horseshoe crabs has come and the DMF proposal is an insufficient response to a complex situation.

On behalf of APCC, thank you for considering these comments and suggestions.

Sincerely,



Andrew Gottlieb  
Executive Director