



August 3, 2022

Mr. J. Clarke, Chair  
Horseshoe Crab Management Board  
Atlantic States Marine Fisheries Commission  
[comments@asmfc.org](mailto:comments@asmfc.org)

**Re: Delaware Bay Horseshoe Crab Proposed Framework Revision – Abandon Effort to Undermine Protections by Allowing Female Crab Harvest**

Dear Mr. Clarke,

The Delaware Riverkeeper Network is writing to urge you to not approve the proposed framework revision for harvesting Delaware Bay horseshoe crabs at the August 3, 2022 ASMFC Summer Meeting. Under the proposed management revision, 175,000 to 190,000 female horseshoe crabs could be harvested from the Delaware Bay as soon as 2023, according to some experts. In reaching this decision, the ASMFC disproportionately relied on surveys it has long considered biased and of dubious accuracy, which “reduces the scientific credibility” of the proposed revision, according to committee members and former proponents of the ARM framework (Niles, Burger, Mizrahi, & Dey, 2021).

Each year since 2013, the ASMFC has selected the same allowable harvest totals for Delaware Bay horseshoe crabs, which is 500,000 males and zero females. It was agreed that the prohibition on harvesting female horseshoe crabs would not be lifted until the Delaware Bay region hosts at least 81,900 red knots or 11.2 million female horseshoe crabs. Neither of these scenarios has occurred yet and making these changes now would put a severe strain on horseshoe crabs, red knots, and other shorebirds. In fact, the Virginia Tech trawl survey, which is the only horseshoe crab-specific survey that has been historically reliable, continues to indicate that female horseshoe crabs are in trouble. Similarly, red knot counts have been at historic lows in recent years. The average red knot count at Tierra del Fuego for 2018-2020 declined more than 75 percent from average counts in the 1980s and 2000, and only 6,800 red knots were counted in 2021.

The ASMFC must provide the raw data, modeling, and analysis that justifies the expansion of the harvest of female horseshoe crabs for the public to thoroughly review before any action can be taken. This fundamental change in policy and risk to the recovery of the red knot is being done behind closed doors without robust and engaged public consideration. The interests of the public and other stakeholders cannot be undermined by the short-term fishery interests and lack of precautionary principle by the ASMFC.

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Requests by leading members of the conservation and environmental communities for access to the models have been denied.

Moving forward with this proposal would inflict severe damage to the Delaware Bay ecosystem. The Delaware Riverkeeper Network requests that the Board suspend the draft addendum and instead continue to protect horseshoe crabs at current levels. At a minimum, the draft needs to be suspended until it can be amended to include stakeholder-based protections regarding recovery levels prior to reopening female crab harvest, and that the fundamental modeling and other technical analyses foundational to the addendum's recommendations be publicly shared and fully made available and reviewed by interested stakeholders.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Maya K. van Rossum". The signature is fluid and cursive, with a long horizontal stroke at the end.

Maya K. van Rossum  
the Delaware Riverkeeper