



12 April 2006

Mr. Braddock Spear  
Atlantic States Marine Fisheries Commission  
144 'Eye' Street, Northwest  
Washington, D.C. 20005

Dear Mr. Spear:

The U.S. Shorebird Conservation Plan Council (Council) represents a collective of individuals and organizations interested in the long-term conservation of the hemisphere's shorebirds. At our recent meetings, we have discussed the issue of horseshoe crabs and shorebirds in Delaware Bay and throughout the Atlantic Flyway. We realize the difficult task the Atlantic States Marine Fisheries Commission has in considering the needs of birds that travel from the Arctic to southern South America when making management decisions for the horseshoe crab fishery. Due to the recent dramatic declines in red knot (*Calidris canutus rufa*) populations and the lack of their recovery, we offer comments on Addendum IV to the Interstate Fishery Management Plan for Horseshoe Crab.

Under New Jersey and Delaware, the Council believes the most risk averse management strategy would be to invoke option 3, full two-year moratorium, for bait harvest. If shorebird populations, especially red knots, demonstrate a positive response to this action, the slightly more harvest-liberal strategy (option 2) might be put in place after two years. Although option 4 under the Maryland and Virginia might offer a reasonable compromise, we question whether such detailed regulations would be enforceable. If not, we would favor invoking option 3, partial moratorium.

Concerning take for the biomedical industry, we suggest allowing the harvest of crabs for this purpose and allowing crabs not returned alive to the general area of capture to be available to the bait industry. The Council suggests that the allowable harvest for the biomedical industry not exceed 300,000 crabs and that the amount available to the bait industry not exceed 20% of that amount (60,000 crabs). The Council suggests that biomedical needs be met before bait harvest in Maryland and Virginia be considered.

A handwritten signature in black ink, appearing to read "John P. Cecil".

John P. Cecil  
Vice Chair, U.S. Shorebird Plan Council