



# The U.S. Shorebird Conservation Plan

## *Building Partnerships for Shorebird Conservation*

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Service Information Collection Clearance Officer  
MS 2042-PDM  
4401 North Fairfax Drive  
Arlington, VA 22203

Dear Madam/Sir:

We are writing to you to support the extension of the currently approved information collection for the Horseshoe Crab Tagging Program (#1018-0127). Provided are comments addressing the necessity and utility of the proposed information collection and ways to enhance the quality and utility of information to be collected and the burden of collection. The U.S. Shorebird Conservation Plan Council represents a group of organizations and agencies dedicated to furthering the conservation of migratory shorebirds in the U.S. and throughout the hemisphere.

Long-term tagging studies on horseshoe crabs are necessary to evaluate geographic distribution, survival, and abundance of various breeding populations. Resource managers need this information to effectively regulate horseshoe crab harvest and state quotas. Sustainable use of horseshoe crabs is needed to maintain the biomedical industry, fishing interests, and natural systems, such as the Delaware Bay migratory shorebird stopover and the Red Knot population. Delaware Bay is recognized as a migratory stopover of hemispheric importance to shorebirds by the Western Hemisphere Shorebird Reserve Network.

Tag recovery data could provide important information on the Atlantic Coast distribution of horseshoe crab breeding populations. Currently, most horseshoe crab harvests occur off the Atlantic Coast (between August and March), but there is little understanding of how many crabs are harvested from different breeding populations or the effect of harvest on these populations. Understanding the proportional representation of breeding stocks in the harvest is important because of the concern about the recovery of crabs that breed in Delaware Bay

Currently, 92% of the global supply of *Limulus Amebocyte Lysate* comes from the American horseshoe crab population via bleeding labs in Massachusetts, New Jersey, Maryland, Virginia, and South Carolina. Because the demand for crabs for biomedical bleeding has increased by 47% between 2004 and 2010, tagging studies are needed to estimate mortality associated with this industry.

The utility of tag recovery data could be enhanced by: 1) increasing tagging and recovery efforts on the spawning beaches of Maryland and Virginia, 2) quantifying effort spent during tag recovery surveys, and 3) using formal models to estimate survival of crabs bled and tagged by the lysate industry.

Lastly, we believe the burden to the public is minimal as many reporters are volunteers and enjoy searching for marked crabs. The current on-line reporting system seems easy to use and does not seem onerous for respondents; perhaps batch reporting could be facilitated for online reporting or one-on-one interaction with fishermen who report tags could be facilitated through states or volunteers. The value of the tagging return data appears to offset the cost to agencies applying tags.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Cecil', written in a cursive style.

John Cecil  
National Audubon Society  
Chair, U.S. Shorebird Conservation Plan Council