

Katie Scharf Dykes
Commissioner
Connecticut Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106

June 10, 2021

Ms. Dykes,

I am writing to you today to call for an emergency ban on the harvest of horseshoe crabs from Connecticut waters, rescinding CT DEEP-issued commercial horseshoe crab fishing licenses effective immediately through the end of the commercial harvest season, July 7, 2021.

The Atlantic States Marine Fisheries Commission, which oversees management of the species on the East Coast, has downgraded the stocks of horseshoe crabs in the New York Region, which includes Long Island Sound, in each of the past three assessments, from Good in 2009 to Neutral in 2013 to Poor in 2019.

The state of Connecticut lags behind its neighbors in efforts to protect this imperiled “living fossil,” one that is important to the survival of a number of other species. New Jersey declared a moratorium on horseshoe crab harvesting in 2008. New York has a quota of 366,272 horseshoe crabs per year but caps the limit at 150,000, and over the past two years the State Department of Environmental Conservation has closed the fishery during peak spawning times at the end of May and beginning of June.

An immediate moratorium on the harvest of horseshoe crabs is the sensible solution as it will be in effect during the remaining full moon/high tide phase of the current season, peak spawning time for the horseshoe crabs. Please be aware that Friends of Animal also intends to help draft legislation to ban the harvest of horseshoe crabs statewide and to introduce it during the 2022 legislative session.

Our reasoning and the science supporting it is clear.

In her testimony to the CT DEEP last year with regard to a ban on such harvest on Stratford beaches, Jennifer H. Mattei, a biology professor at Sacred Heart University who leads Project Limulus, wrote: “The density of spawning horseshoe crabs is so low that the females cannot find mates and therefore this population is not reproducing at its maximum potential. The density of spawning horseshoe crabs in Long Island Sound is so low that shorebirds do not have the eggs as a food resource.... The overharvest of this species in Connecticut and New York has resulted in the ecological links to shorebirds and fish to be broken.”

A *New York Times* article published on June 5, 2021, reported the lowest tallies of red knots along the mid-Atlantic coast since counts began 40 years ago. “An earlier decline had been halted by years of conservation efforts, including a ban by New Jersey on the harvesting of horseshoe crabs, whose eggs provide essential food for the birds on their long-distance migrations.

“I think that we need to think about the red knot as a species that is dying, and we really need emergency measures,” said Joanna Burger, a biologist at Rutgers University. She has studied the knot and other declining shorebirds such as ruddy turnstones and semipalmated sandpipers on the Delaware Bay since the early 1980s.”

Burger has called for an immediate ban on the harvesting of horseshoe crabs for bait.

Connecticut’s horseshoe crabs are killed to be used as bait to capture American eels and whelk. Alternatives to using horseshoe crabs as bait exist in both cases. Even so, the market for eels – itself a “depleted” species, is in decline, and the whelk fishery in Connecticut waters is facing growing pressure.

We urge you to issue an emergency ban on harvesting so that Connecticut’s dwindling population of horseshoe crabs can begin to recover.

Thank you for your prompt response to this request.



Priscilla Feral
President