



April 11, 2023

US Fish and Wildlife Service  
5275 Leesburg Pike, MS: PRB (JAO/3W)  
Falls Church, VA 22041-3803  
Electronically submitted to: [Info\\_Coll@fws.gov](mailto:Info_Coll@fws.gov)

**Re: Docket No. FWS-R5-FAC-2023-0004 – Horseshoe Crab Tagging Program**

To whom it may concern:

Delaware Riverkeeper Network (DRN) is writing in support of the USFWS tagging program of horseshoe crabs as this tracking and program better helps assess the impact of the many pressures on this still ailing species that deserves the strongest protections possible due to its important ecological benefits to the Delaware bay, migratory shorebirds, and beyond. Each year DRN helps deploy USFWS tags working with our allies American Littoral Society, along the Delaware Bay. DRN deploys tags at one New Jersey beach and resights tags during the May and June spawning surveys along the Delaware Bay that have been conducted by DRN for over 22 years. We train and use volunteer monitors to conduct this work which helps show the efficiency of this program as concerned volunteers can with oversight and training, deploy tags safely and efficiently while also having a wonderful hands on experience with these ancient species. As a result, we have exposed hundreds of volunteers to the unique experience of working with this ancient species along the beautiful bay which leads to better advocacy by the general public which is required with all the pressures the crabs still endure. Our teams are small each evening with a maximum of 6 people to ensure tagging is done in a controlled way and to add to the experience of a peaceful evening along the Bay.

We believe deploying additional tags if the Service provided additional tags would also be possible using trained volunteers from conservation groups and would help in the USFWS's effort to better evaluate migratory patterns, survival and abundance of horseshoe crabs. This tagging effort is even more critical with an ASMFC that as early as this year was attempting to undermine the female crab moratorium for eel and conch harvest – something that DRN and the conservation community believe is not warranted due to the dire conditions of both the horseshoe crab populations, egg densities on the beach, and plummeting numbers of red knot and other shorebird species that rely on crab eggs. For new volunteers who resight a horseshoe crab the certificate and crab pin is such a special treat for many first time volunteers where as many of our seasoned volunteers do not request those pieces though the location of the crab tagging is always welcome information.

DRN asks that the Service consider the recently provided bleeding BMPs from the Horseshoe Crab Recovery Coalition when it comes to tagging of bled crabs by the lyphosate industry – comment was

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submitted this April to help reduce crab mortality while we work to phase out the use of crabs for biomedical purposes.

Thank you for your time and continuing to support this program in full and perhaps expand it to deploy additional tags to help better monitor and protect this ancient keystone species at this still critical time.

Sincerely,

Faith Zerbe  
Delaware Riverkeeper Network  
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