



March 28, 2025

Ms. Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501

RE: Comment on B reports - B2 NMFS EFH report

Dear Chair Drobnica and Council Members:

The Alaska Bering Sea Crabbers (ABSC) is a trade association representing the majority of independent crab harvesters who commercially fish for king, snow (opilio), and Tanner (bairdi) crab with pot gear in the Bering Sea and Aleutian Islands (BSAI) Crab Rationalization Program. With NOAA ready to launch the next 5-year Review at the upcoming June 2025 Council meeting and preparing the roadmap to identify which essential fish habitat (EFH) components will be prioritized for updates in the fishery management plans (FMPs), we appreciate the opportunity to remind the Council of ongoing requests and to weigh in at this step of the process to provide some preliminary thoughts and recommendations ahead of June.

Alaska Bering Sea Crabbers continues to advocate for higher-resolution data to be considered in the EFH review process for crab. Particularly, we encourage the Council to support EFH descriptions and species distribution models (SDMs) for crab by sex and by life stage, as well as seasonally. This is captured in Table 7-1 of [Amendment 56 to the BSAI Crab FMP](#), where each stock assessment author provided research recommendations for their BSAI crab species. These include focus areas of research and identify data sources for future EFH map iterations.

BSAI Crab FMP Revised Appendix F

Table 7-1 Stock assessment author research recommendations for Bering Sea/Aleutian Island crab species. These include focus areas of research and identify data sources for future EFH map iterations.

| Bering Sea & Aleutian Island Crab | Research Notes from Stock Assessment Authors |
|-----------------------------------|--|
| blue king crab | Explore using FE model outputs for smaller areas within the EFH regions such as known nursery habitats where blue king [crab] utilize cobble and shell hash. Map early benthic life stages. Research female spawning and juvenile habitat needs. |
| golden king crab | Incorporate observer data from the fishery and pot survey in the eastern portions of the grounds. |
| red king crab | Model immature and mature crab separately. Model FE for different seasons. Explore using FE model outputs in smaller areas of interest within the EFH regions such as important spawning areas and molting areas. Research female distributions, critical spawning habitat, and movement outside of the summer months. |
| snow crab | Model immature and mature crab separately. Explore using FE model outputs in smaller spatial and temporal results. |
| Tanner crab | Research immediate and longer term responses to nearby fishing effects (effects of increased sediment load in the water column on respiration, fishing effects on prey abundance and quality, fishing effects on predator distributions). |

We're encouraged by the Alaska EFH Research Plan Update (page 5) where two of the three objectives aim to address some of the data gaps outlined previously.

- *Objective 1: Improve EFH information for targeted species and life stages;*
- *Objective 2: Improve fishing effects assessment; and*

Similarly, we also appreciate the document highlights some of the EFH research projects recently funded and in-progress (pages 4-5), along with publications from recently completed EFH research projects (page 6). These projects are important to track the progress and consider in the upcoming EFH 5-year review. Lastly, for fiscal year 2025, the document shows that NOAA Fisheries prioritizes the following projects:

- *Habitat utilization of juvenile snow crab in a warming Bering Sea: The interactive effects of ontogeny and temperature on juvenile snow crab energetic condition, metabolic scope, and survival. (Alaska EFH RFP; year 2 of a 3 year proposal).*
- *Leveraging a unique winter survey opportunity to improve the understanding of essential habitat for red king crab in Bristol Bay. (Alaska EFH RFP; year 1 of a 3 year proposal).*

Once more, we are encouraged by the update on EFH related research projects and the crab-focused EFH priorities. We would like to take this opportunity to highlight the crab research updates that the Bering Sea Fisheries Research Foundation (BSFRF) provides to the Crab Plan Team (CPT) at each of their meetings, some of which is very relevant to the EFH priorities and objectives. One of the ongoing updates the BSFRF has been providing to the CPT are the collaborative pot sampling (CPS) projects. Two have been completed, with more planned. This is new data that is available and is a direct response to the 4th prioritized project identified by NOAA (*Leveraging a unique winter survey opportunity to improve the understanding of essential habitat for red king crab in Bristol Bay*).

In summary, we are pleased to see new science and research on crab being published and made available, and we urge the Council and NOAA Habitat Division to find ways to incorporate these new data into the upcoming EFH 5-year review.

Thank you for considering our comments.

Sincerely,



Gabriel Prout
President
Alaska Bering Sea Crabbers