November 28, 2025

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

Re: Comment on Agenda Item D2 – EFH 5-Year Review Workplan

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. Thank you for the opportunity to comment on the draft 2028 Essential Fish Habitat (EFH) 5-Year Review Workplan. We appreciate the significant progress made in advancing the science and analytical methods that underpin EFH designations in the North Pacific and we commend NMFS and Council staff for their continued commitment to improving habitat information and ecosystem-based management.

We are encouraged by the proposed updates for the Bering Sea and Aleutian Islands (BSAI) crab stocks. Particularly, the response to our previous requests to update Level 2 EFH descriptions and maps by sex and maturity stage, as well as develop Level 3 EFH maps for juvenile snow and Tanner crab, as these efforts represent meaningful advances that will improve our understanding of critical crab habitats. We also applaud the previous work and inclusion of the supplemental EFH maps for Bristol Bay red king crab and the integration of new research on juvenile energetics and survival. While new research is essential to help move the needle forward, incorporating these targeted studies into this EFH workflow are vital steps toward more effective habitat-based management of crab populations, and for that, we are greatly appreciative.

As the Council continues to move forward and update the EFH management process, we respectfully request that crab-specific EFH research and analysis continue to be prioritized and expanded upon**.** We understand the EFH process is fluid and does not necessarily need Council action to begin incorporating new research and results as it comes online, nor the dissemination of results as the EFH team produces such, but we appreciate the Council's attention and concerted efforts to help stabilize and rebuild crab populations. Given the ecological and economic importance of BSAI crab fisheries and the substantial changes these stocks have experienced in recent years, there is a pressing need for more detailed habitat information across all life stages, seasons, and stock areas**.** Additional emphasis on crab-specific prey relationships, spatial and temporal habitat variability, and potential gear interactions will further strengthen the scientific foundation for future management actions.

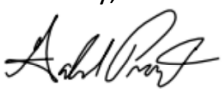
For this 2028 review, the Council's use of EFH is intended to monitor and protect habitats necessary for spawning, feeding, nursery, and growth to maturity for all species. If populations are genetically structured and locally adapted, the effective spatial scale at which "necessary" habitat must be protected may be smaller and more critical than assumed under a panmictic model. For example, local adaptation means that loss of habitat for red king crab (RKC) in Bristol Bay cannot necessarily be compensated by recruitment from red king crab in Norton Sound or the Pribilof Islands. We therefore urge the Council and

EFH team to continue incorporating best available scientific data as it becomes available. In this case, we highlight recent findings from *"Whole Genome Sequencing Reveals Substantial Genetic Structure and Evidence of Local Adaptation in Alaskan Red King Crab"* which provides critical insight into population structure, stock connectivity, and potential local adaptations for red king crab throughout Alaska, with at least five major regional clusters and finer substructure within those regions. That genomic evidence increases the conservation value of locally used habitats, because loss or degradation of habitat for these genetically distinct, locally adapted populations risks loss of unique adaptive variation and limited recovery via immigration. This is similar to the way we manage genetically distinct populations of marine mammal stocks, such as belugas, orcas and humpback whales. Integrating these findings into EFH maps and descriptions could allow for more stock-specific habitat delineations and better alignment of spatial management with the biological realities of red king crab populations, ultimately improving our understanding of stock-specific essential habitat and how best to manage fishery impacts on each unique stock structure and their corresponding habitats. This is outlined under component 2, with the acknowledgment to incorporate new data, so we encourage the Council to include this in their recommendation to the EFH team as a high priority given the current status of Alaska's crab stocks. Along those same lines, we also encourage the Council to explore appropriate onramps to integrate these new crab EFH products into future management tools, such as spatial management measures, conservation and enhancement strategies. Continued collaboration among NMFS, the Alaska Department of Fish and Game, research partners, and industry sectors will be essential to advancing these shared goals.

In summary, the EFH 5-year Review is a valuable tool at the Council's disposal to ensure the best available science is incorporated into Fishery Management Plans (FMPs) for EFH, as well as proactive management of essential habitat, including adverse impacts from fishing gears on habitat. We are pleased to see the proposed processes to update crab descriptions by sex and maturity stage as well as the considerations for incorporating some of the recent and ongoing crab research studies across the Bering Sea. We highlight the RKC genomic study to consider whether finer scale considerations for stock-specific EFH is warranted under this Council tool.

Thank you for considering our comments.

Sincerely,



Gabriel Prout
President
Alaska Bering Sea Crabbers