



September 26, 2025

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

Re: Comment on Agenda Item D3 – EFH 5-Year Review Workplan

Dear Chair Drobnic 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 Plan. 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. Thank you for the opportunity to provide our crab industry input to the Council for the proposed plan for the 2028 EFH 5-year Review.

We are especially 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 looks ahead to the 2028 review and beyond, we respectfully request that crab-specific EFH research and analysis continue to be prioritized and expanded. 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, and we acknowledge the time and resources it takes to do so, particularly under the reshuffling in NOAA. 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.

In addition, we urge the Council and EFH team to consider recent findings from emerging genetics research into EFH descriptions, particularly for red king crab. The 2024 study "*Whole Genome Sequencing Reveals Substantial Genetic Structure and Evidence of Local Adaptation in Alaskan Red King Crab*" provides critical insight into population structure, stock connectivity, and potential local adaptations across the species' range. Integrating these findings into EFH maps and descriptions could allow for more stock-

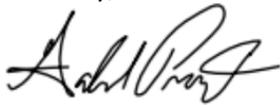
specific habitat delineations and better alignment of spatial management with the biological realities of red king crab populations, ultimately improving our understanding of stock-specific essential habitat and how best to manage fishery impacts on each unique stock structure and their corresponding 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.

We also encourage the Council to consider and explore opportunities to integrate these new crab EFH products into future management tools, such as spatial management measures, conservation and enhancement strategies, and dynamic management approaches. Continued collaboration among NMFS, the Alaska Department of Fish and Game, research partners, and industry 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 by effects of 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.

Thank you for considering our comments.

Sincerely,

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

Gabriel Prout
President
Alaska Bering Sea Crabbers