UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Alaska Fisheries Science Center
Fisheries Monitoring and Analysis Division
7600 Sand Point Way N.E. Seattle, WA 98115-0070

April 20, 2026

LETTER OF ACKNOWLEDGEMENT (LOA): AFSC 2026-03

David T. Wilson
Executive Director
International Pacific Halibut Commission
2320 W. Commodore Way, STE 300
Seattle WA 98199

Dear Mr. Wilson:

This letter acknowledges that you have submitted a scientific research plan dated April 09, 2026 as specified at 50 CFR 600.745 for the attached group of vessels to conduct the IPHC Fisheries' Independent Setline Survey (FISS) in federal waters off Alaska.

Vessel Names: *F/V* Kema Sue, *F/V* J-Bea, *F/V* Predator, *F/V* Pender Isle (Canada)

Chief Scientist: Tyler Jack, Senior Setline Survey Coordinator

Effective Dates: May 22 – September 15, 2026

Study Area: IPHC regions off Alaska. A map of IPHC survey stations is attached.

The IPHC is conducting this survey as part of a scientific research plan thus is not regulated or bound by regulations under the Magnuson-Stevens Fishery Conservation and Management Act. Thus, the IPHC may retain and sell legal-sized and U32 halibut, Pacific cod and rockfish at the end of each cruise. Upon any vessel inspection, the lead scientist and captain must provide documentation and identification of any retained catch.

This LOA is separate and distinct from any permit required by the Marine Mammal Protection Act, Endangered Species Act, or any other applicable law. In order to facilitate identification of your activities as scientific research, a copy of the survey plan and this LOA must be on board each research vessel while conducting survey activities. Due to a lapse in the Letter of Authorization (awaiting reauthorization), the AFSC is not sponsoring the IPHC research through this Letter or Acknowledgment (LOA), for purposes of extending the Marine Mammal Protection Act (MMPA) permit and Endangered Species Act (ESA) take exemption to the IPHC. However, the AFSC highly recommends the IPHC to continue to follow the previous Letter of Authorization monitoring, mitigation, and reporting requirements under the ESA and the MMPA during the "lapse period". These requirements include, among other things, reporting and communication

with AFSC and NMFS Alaska Region staff, who are also available to answer questions and assist with compliance. In addition, IPHC staff are encouraged to contact AFSC and NMFS Alaska Region staff regarding any changes to IPHC scientific research activities that may cause effects beyond those already considered in the relevant ESA Section 7 biological opinion and MMPA previous five-year letter of authorization (such as use of new gear; gear modifications; or changes in survey intensity, timing, or location, including in Cook Inlet).

Generally, activities are deemed scientific research if conducted in accordance with the scientific research plan submitted for this LOA. Not covered by this LOA are any activities found not to fit the definition of scientific research activity or are outside the scope of the scientific research plan submitted for this LOA. This LOA covers research activities conducted inside the U.S. Exclusive Economic Zone. If work is conducted in state waters, NMFS/AFSC advises the IPHC to contact the Alaska Department of Fish & Game (ADF&G) and other appropriate state agencies to ensure all state permitting requirements are met.

The AFSC requests copies of any cruise report or other publication created resulting from this cruise, including the amount, composition, and disposition of your samples, oceanographic, and benthic substrate data collected. Please send to:

Dr. Robert Foy
Science and Research Director
Alaska Fisheries Science Center
7600 Sand Point Way NE
Seattle, WA 98115

We also request that any incidental take of, or injuries or mortalities to, marine mammals as a result of this research be reported to Anne Marie Eich (annemarie.eich@noaa.gov, 907- 586-7172) or Jerry Hoff (jerry.hoff@noaa.gov, 206-526-4580).

For information regarding this LOA, please contact Robert Foy by phone at 907-482-0026; by FAX at 206-526-4004; or by email at Robert.Foy@noaa.gov.

Robert Foy, Ph.D.
Science and Research Director
Alaska Fisheries Science Center

cc:
ADFG – D. Vincent-Lang
F/AKR – J. Kurland
NPFMC – D. Witherell
F/OLE – B. Cheeseman
USCG D17 - Commander

More information on the ESA, and MMPA:

16 U.S.C. §§ 1531–1544): There are numerous endangered and threatened species in the proposed research areas, including: Steller sea lions, fin whales, humpback whales, North Pacific right whales, sperm whales, Western North Pacific gray whales, and bowhead whales. More information on these species can be found at: https://alaskafisheries.noaa.gov/pr. NMFS Alaska Region also provides an Endangered Species Interactive Map of threatened and endangered marine mammals and critical habitat under NMFS jurisdiction in Alaska (see https://alaskafisheries.noaa.gov/maps).

Under the ESA, no person may "take" any endangered or threatened species without authorization. Take means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct. Pursuant to 16 U.S.C. § 1539(a)(1)(B), the Secretary of Commerce may permit a prohibited taking of an ESA listed species if it is incidental to, and not the purpose of, carrying out an otherwise lawful activity, such as marine scientific research. Accordingly, if the IPHC conclude their research could result in unintentional interactions with ESA-listed species, the vessel should obtain a permit under § 1539(a)(1)(B) before engaging in activities in the U.S. EEZ that may result in take. Such permits can be obtained by following the instructions found here: https://www.fisheries.noaa.gov/permit/permits-incidental-taking-endangered-and threatened-species.

A permit issued under § 1539(a)(1)(B) of the ESA will include measures to minimize and mitigate the impacts of the authorized research activity. The IPHC must comply with those measures. Without a permit issued under § 1539(a)(1)(B) of the ESA, the IPHC are liable for any take of ESA-listed species in the U.S. EEZ. To note: there are different requirements under the ESA if the scientific research will intentionally take an ESA-listed species or if the research has been authorized, funded, or carried out in partnership with a U.S. federal agency.

In addition, there are special regulations to protect ESA-listed species in waters off Alaska. This includes regulations governing the approach of humpback whales (50 C.F.R. § 224.103(b)), and prohibitions to protect the endangered western distinct population segment of Steller sea lions, which includes no-transit zones surrounding specified sea lion rookeries (50 C.F.R. § 224.103(d)). More information on these regulations, as well as recommended guidelines, can be found at: https://alaskafisheries.noaa.gov/pr/mm-viewing-guide.

There are also regulations establishing designated critical habitat for two ESA-listed species: the endangered western distinct population segment of Steller sea lions, 50 C.F.R. § 226.202, and the North Pacific right whale, 50 C.F.R. § 226.215. More information on Steller sea lion critical habitat can be found at https://www.fisheries.noaa.gov/action/designation-critical-habitat-steller-sea-lions.

If the proposed scientific research activity will occur in or near areas designated critical habitat for North Pacific right whales, NMFS Alaska Region recommends that vessel

operators within designated critical habitat be especially vigilant for North Pacific right whales, and limit vessel speed to 10 knots or less within designated critical habitat, due to the right whales' susceptibility to ship strikes. More information on North Pacific right whale critical habitat can be found at https://www.fisheries.noaa.gov/resource/map/north pacific-right-whale-critical-habitat-map.

2. MMPA (16 U.S.C. §§ 1361–1421h): There are numerous marine mammals protected under the MMPA in the proposed research area. The MMPA prohibits the unauthorized "take" of any marine mammal in the U.S. EEZ. Take under the MMPA means to harass, hunt, capture, or kill. Pursuant to 16 U.S.C. § 1371(a)(5), NMFS may issue an incidental take authorization for activities that result in the incidental but unintentional take of small numbers of marine mammals and that includes measures for monitoring and minimizing the impact of that take on marine mammals. However, there is no MMPA incidental take authorization available to non-U.S. citizens. Thus, for the IPHC to obtain an incidental take authorization, it will need to partner with a U.S. citizen who will obtain an incidental take authorization from the Secretary of Commerce under 16 U.S.C. § 1371(a)(5)(D) (instructions found here: https://www.fisheries.noaa.gov/national/marine-mammal-protection/apply-incidental take-authorization). If scientific research is conducted in conjunction with and under the direction of U.S. citizens who have obtained an MMPA incidental take authorization, the IPHC would have to comply with the conditions set forth in the incidental take authorization, including mitigation measures. If the IPHC are in compliance with the incidental take authorization and takes a marine mammal during that scientific research, the IPHC would not be liable under the MMPA for that take of a marine mammal. Without an incidental take authorization, the IPHC are liable under the MMPA for any take of a marine mammal in the U.S. EEZ.

Scientific Research Plan – Alaska
2026 Fishery-Independent Setline Survey

PREPARED BY: IPHC SECRETARIAT (09 APRIL 2026)

The International Pacific Halibut Commission (IPHC) Fishery-Independent Setline Survey (FISS) provides data for the Pacific halibut stock assessment. Catch per unit effort (CPUE) in numbers and weight, size, age, and sex composition of the Pacific halibut catch are used to monitor changes in abundance, growth, and mortality in the population. FISS data are used to determine Pacific halibut range, local depletion, and fleet distribution effects on the resource. In addition to Pacific halibut data, the IPHC Secretariat record catch of other organisms captured incidentally to the gear targeting Pacific halibut. These data provide insight into bait competition, rate of bait attacks, and composition of the catch for the directed commercial Pacific halibut fishery. All cases of suspected depredation by marine mammals on fishing gear are recorded to monitor occurrences, and to help assess whether marine mammal depredation affects that set's data to the extent that it cannot be used in the Pacific halibut stock assessment. IPHC has aligned its protected species avoidance, mitigation, and reporting rules with those adopted by the NOAA Fisheries Alaska Fisheries Science Center for the FISS.

FISS Objectives

- Provide standardized data for stock assessment including catch per unit effort (CPUE), sex-specific length at age, and age composition.
- Examine Pacific halibut distribution and abundance, including how the sex, length, weight, maturity, and age composition change over the grounds.
- Provide stock dynamics data that might not be available through the commercial fishery statistics. Examples include catch composition, overall rate of bait attacks, Pacific halibut sex and maturity data, presence of prior hooking injuries, and data from juvenile (sublegal) Pacific halibut.
- Log seabird occurrence and interactions with fishing activity.
- Log marine mammal occurrence and interactions with fishing gear.

FISS Description

For logistical management and accounting purposes, the IPHC's 2026 FISS is divided into 13 sections (known as charter regions) within IPHC Regulatory Areas 2B, 2C, 3A, 3B, 4A, and 4B (Figure 1).

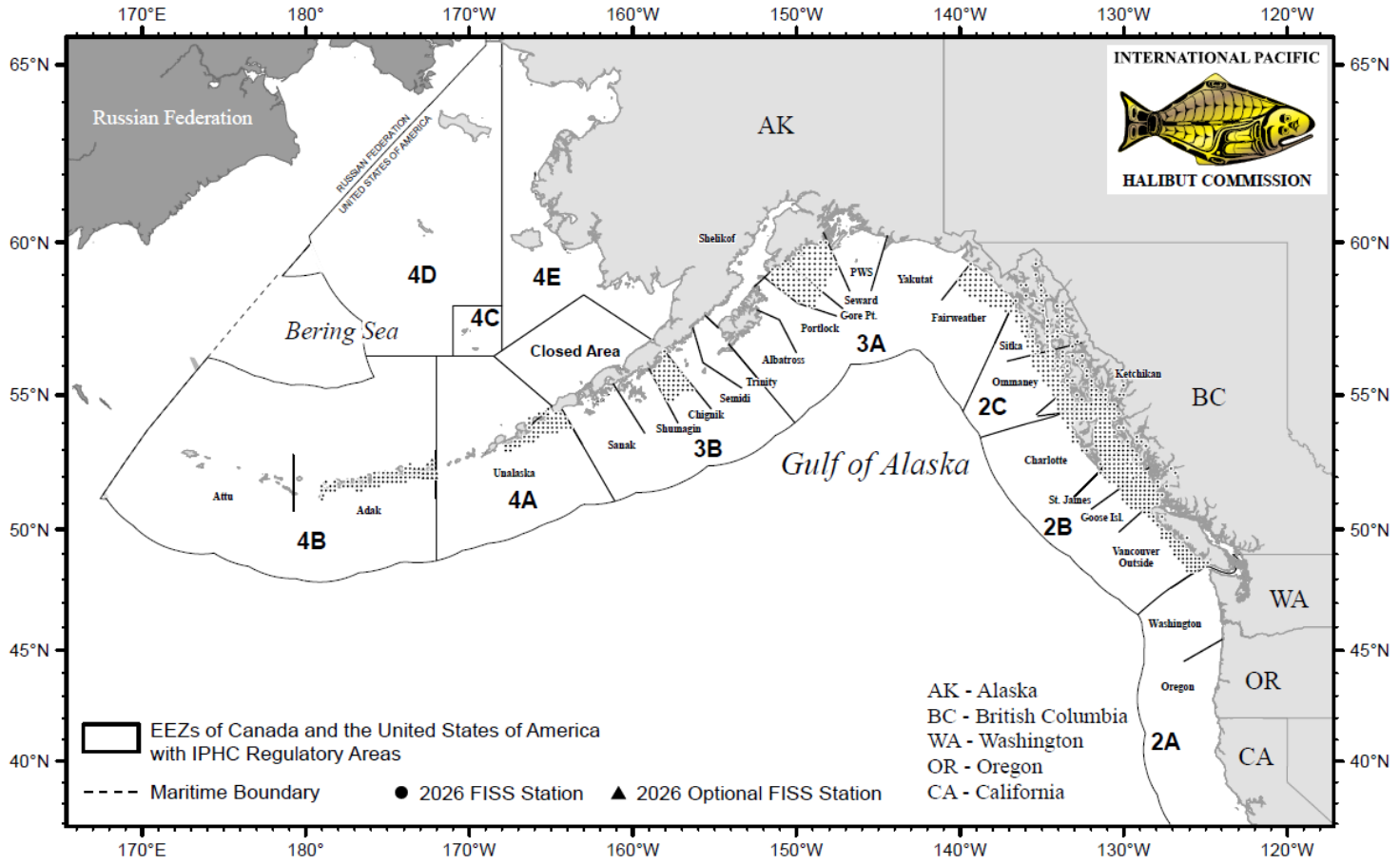

Figure 1. IPHC FISS stations by charter region and IPHC Regulatory Area in 2026.

The FISS has been designed to maximize coverage over the charter regions and consists of a regular distribution of stations on a 10 nmi by 10 nmi grid (Figure 2). The center of each station is within the standard FISS depth range of 18-732 m (10 to 400 fathoms). The end of some sets may extend shallower or deeper than the standard range. A set will consist of four to eight 549 m (1,800 ft) skates in 2026, with 100 hooks per skate. Gear may be provided as full or partial skates coiled either in tubs or on skate bottoms. Skates are uniformly rigged with No. 3 (16/0) Mustad model 39965 circle hooks spaced along the groundline at 5.5 m (18 ft) intervals (100 per skate). Gangions are 72-thread count, hard lay material between 0.61-1.22 m (24 to 48 in) after tying. Vessels will fish a set at each station following standard FISS protocol. An

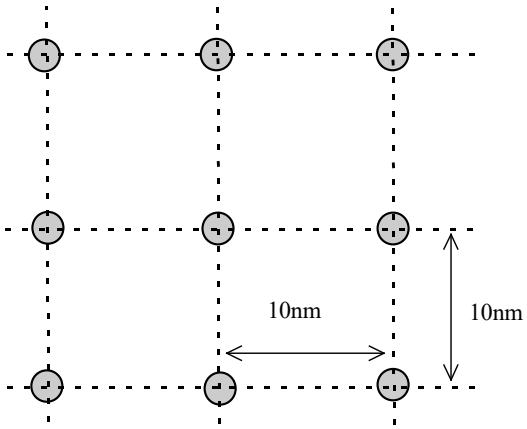

Figure 2: Station pattern

example of the basic station pattern is given in Figure 2. The marks in Figure 1 show stations where one standardized set will be deployed and retrieved.

Each charter region will take approximately 15 to 25 fishing days to complete. This does not include additional days required for loading, offloading, running, foul weather, resetting stations, etc. The FISS has been designed so that the average vessel can fish approximately three stations per day. If the vessel cannot keep up with the station design, the charter must be extended, and the number of fishing days increased until all stations in the charter area are complete.

Setting will begin at approximately 05:00 local time each morning. When all stations for that day are set, the vessel will return to the first station and begin hauling after the set has soaked at least 5 hours. The choice of where to begin and the number of stations to fish each day is left to the discretion of the captain and Secretariat in consideration of the logistics of setting and hauling, weather and tide conditions, and distance between sets. A single coordinate indicating the center of the station is given for each station location. The gear should be set through this position in either N-S or E-W orientation. All stations within a FISS charter region do not have to be set in the same direction. If closures, weather, or tides do not permit setting directly N-S or E-W, the captain may set in the direction necessary. Under no circumstances should the setting of the grid stations be altered to purposefully increase or decrease the catch.

If any set soaks more than 24 hours, the set will be considered unsuccessful and must be hauled and reset at a later date. The working day for the vessel crew ends when all the fish have been dressed, examined by the Secretariat, iced, and all gear is baited and ready for the next day's fishing. Due to weather, gear problems, vessel speed, heavy fishing, etc., it is anticipated that the length of the working day will vary. While the FISS design calls for finishing on deck between 19:00 and 21:00 local time, it will not be uncommon for a vessel which started setting at 05:00 local time not to finish on deck until well after 22:00 local time. For vessels with satisfactory speed, and an efficient crew, the workday is expected to be approximately 16 hours or less.

"Foul weather days," when work is not possible, are anticipated. As a guideline, sampling will not occur in seas above 15 feet and winds above 30 knots. Above these sea and wind conditions, fish may fall off the longline, sometimes unobserved, resulting in an underestimate of catch rates. The vessel and crew's ability to perform in poor weather is highly variable. The captain and the Secretariat will work together to determine if fishing operations will continue. The Secretariat will suspend fishing operations if it is determined that the weather is significantly affecting the catch or their ability to conduct sampling. The captain may suspend fishing operations whenever he/she determines that fishing is not feasible or safe for the vessel and crew.

Pacific halibut and some bycatch (rockfish and Pacific cod) are retained and sold to offset the cost of FISS operations. The IPHC makes every effort to carefully release any non-retained catch encountered on the FISS. Pacific cod and rockfish bycatch are retained from all skates in

all areas because they are dead or dying upon capture due to barotrauma. All non-retained bycatch will be released with minimal injury.

The IPHC prefers a maximum trip length of 5 to 6 fishing days to maintain optimum fish quality. Vessels must expect to perform at least 5 to 6 trips to complete all sets in a FISS charter region. All fishing operations will be completed between 22 May and 15 September 2026.

FISS Sampling Procedures:
After a minimum five-hour soak, the vessel will return and haul the gear. Pacific halibut are separated by skate, and sampled for length, weight, sex, maturity, and otoliths. Data are collected on any recovered tagged Pacific halibut. Prior hooking injuries are assessed and documented. In addition to the Pacific halibut sampling, we will also be collecting hook information on the first 20 hooks of every skate fished.

Seabird counts are conducted after every haul, and any interactions are recorded. Marine mammal and short-tailed albatross sightings and interactions are documented. A water column profiler will be launched on each station as well. Photo and video documentation will be conducted.

More detailed descriptions of each of the sampling procedures can be found in the IPHC Fishery-Independent Setline Survey Sampling Manual (2026), located here:
2026 FISS Sampling Manual