

ACP Response to FSF Scallop Clapper Data Request

The American Clean Power Association (ACP) appreciates Fisheries Survival Fund (FSF) reaching out to developers regarding concerns identified by your members related to localized scallop mortality events (scallop clappers). We welcome the opportunity to work collaboratively with the fishing industry, scientific community, and state and federal fishery managers on this issue. We are in full agreement that this process should be transparent and conducted in a scientifically appropriate manner. In that spirit, ACP believes that the long established and highly effective Scallop Plan Development Team (PDT) process is the proper venue for review of scientific data to inform this issue. Similarly, the Scallop Research Set-aside program is a scientifically rigorous and trusted program in the region that has a long history of addressing scientific questions as they arise collaboratively and efficiently.

We understand that the Scallop PDT will hold its annual meeting in late August to review scallop survey data to inform scallop fishery specifications. This meeting will be an opportunity to review all available data on scallop clappers, including but not limited to drop camera data collected by the University of Massachusetts School of Marine Science and Technology, dredge survey data collected by the College of William & Mary Virginia Institute of Marine Science, towed Habcam data collected by Coonamessett Farm Foundation, and NOAA Fisheries scallop survey and observer data.

Once the spatial and temporal scope of scallop clappers are better understood, as well as the oceanographic conditions at the time of the expected mortality, relevant developers can then provide data on their geophysical survey activities (location and sound levels) that have occurred in the relevant regions and timeframes to an appropriate third party. In the meantime, developers will identify the most effective way to synthesize relevant data from multiple companies and which third-party would be the most appropriate to process and share these data (e.g. ROSA). Once all data has been provided to a third party for synthesis, developers would be interested in participating in a meeting with the scallop industry and other relevant parties to review these data.

As FSF recognizes, spatial and temporal correlation between offshore wind geophysical surveys and scallop clappers is not necessarily evidence of causation, especially given the range of potential causes of scallop mortality in the marine ecosystem. However, if potential correlation is suggested by available datasets, the developer community would be eager to collaborate on research efforts related to the sea scallop resource, offshore wind development, and environmental conditions and other anthropogenic activities in order to evaluate these issues more comprehensively. We hope this collaboration with the fishing industry and other stakeholders serves as a model to refine future research priorities in characterizing potential interactions between offshore wind development and the sea scallop resource and fishery.