

Subcommittee Name: Guiding Principles**Membership: Taber Allison, Jeri Lawrence, Rob Manes, Winifred Perkins, Mark Sinclair****Status of Subcommittee Work:**

The subcommittee met several times by phone conference to discuss the need and purpose of guiding principles. The subcommittee agreed that the principles would provide an internal benchmark for measuring our success, and provide a framework for external review of the FAC's recommendations. It was proposed that the principles focus on the "why" of the FAC's recommendations, with the recommendations corresponding to "how" the guiding principles were achieved.

Two key issues were the focus of extended discussion among the members of the Guiding Principles Subcommittee: the application of a "Precautionary Principle" and the definition of wildlife as it related to the scope of the FAC's recommendations.

Precaution and uncertainty of risk

Subcommittee members were unable to reach agreement on language that would ensure wind energy development would not be unnecessarily constrained by unwarranted speculation regarding ecological harm, but not ignore reasonable concerns that lacked scientific certainty. The subcommittee could not agree on a strict application of the Precautionary Principle, but they did agree that a less strict application of the concept might address the interests of all parties. Alternative language has been proposed and included in the premises of the guiding principles document for consideration by the full FAC. Consensus is still lacking amongst the subcommittee. The language is as follows:

- 1) *The intent of the recommendations by this Federal Advisory Committee is to provide maximum protection against harm to fish and wildlife, and their habitats, while assuring reasonable opportunity to implement wind energy projects.*
- 2) *The FAC agrees that it is reasonable to proceed with caution where there are threats of serious or irreversible environmental damage but a lack of full scientific certainty about the magnitude of those threats.*

Definition of Wildlife

The charter of the FAC describes the goal of developing guidelines that minimize the impact of wind energy development to wildlife, and members of the subcommittee proposed a definition of wildlife that was assumed to be consistent with the intent of the Fish and Wildlife Service (FWS), an intent that was subsequently confirmed by FWS representatives to the FAC. Other subcommittee members thought the definition was too broad and would entail a level of complexity that could not be accommodated effectively by the FAC's deliberation; recommendations should focus on minimizing impacts to birds and bats. This issue may be addressed by a phased approach beginning with the

most acute issues related to birds and bats, and progressing to possible impacts on other wildlife. Consensus among subcommittee members is still lacking in this realm.

Materials for review (discuss any materials you plan on distributing to the group):

A draft of guiding principles and premises is included for review by the full FAC. The draft includes possible language incorporating the concept of precaution.

Identify Next Steps:

The subcommittee will present the draft recommended principles to the full FAC for review and discussion, and incorporate suggested changes. The next draft will then be submitted to the full FAC for adoption by consensus. We would like to conclude this process by the end of the April meeting.