

**From:** [Bob Fisher](#)  
**To:** [IPA.ContactUs](#)  
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**Subject:** [External] Comments IPA PRELIMINARY DRAFT POLICY STUDY – 22 JANUARY 2024  
**Date:** Monday, February 12, 2024 12:30:04 PM  
**Attachments:** [NREL\\_great\\_lakes\\_wind.pdf](#)  
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To IPA

BCN's comments and proposals for additional materials to be included in the Agency's final report, scheduled for a March 2024 release date, are below.

BCN's comments are specific to **Section (6) New Utility-Scale Offshore Wind Project in Lake Michigan**, with further specific reference to **Subsection (4) Environmental Concerns (a) Environmental Impacts, p 133-134**, addressing ***“Some unique environmental issues to be addressed for Great Lake offshore wind development, such as possible avian interactions, include assessing wind project interactions with the multiple endangered migratory species that fly over Lake Michigan.”***

BCN, as a stakeholder, proposes once again (reference, our previous comments submitted on 10/19/23) that the NREL report be referenced, and that the specific conclusions/recommendations be incorporated in IPA's final draft report scheduled for release in March 2024. IPA did not incorporate that timely and substantive NREL report in the 1/22/24 draft; we believe that to be a significant omission, which should be corrected in the March draft.

The [published study by NREL](#) (copy also attached), in section 7, pages 73-77, identifies the necessity for a multiple year research timeline and substantial costs to effectively assess the feasibility of installing wind turbines in the Great Lakes while preventing/mitigating great harm to wildlife, specifically birds and bats.

Omitting these [NREL recommended pre-permitting and pre-construction research actions](#) results in an unbalanced perspective on the scale and scope of the environmental concerns and impacts that are the intended focus of Section 6, Subjection 4 (a). BCN urges inclusion of the following NREL recommendations in the final draft IPA Report:

- Monitoring baseline activity patterns relative to time (e.g., nightly, seasonally), space (e.g., distance from shore, flight height), and weather (e.g., wind speed, temperature) of bats and birds flying over the Great Lakes. A minimum of 2 years of monitoring, prior to construction, may be required to quantify patterns. Ideally, all five of the Great Lakes will be monitored simultaneously to account for spatial and temporal variation under baseline conditions, but priority is needed where development is likely to occur first (level of effort: >\$2 million, timeline: 2-5 years).
- Developing and validating strike detection systems. Validating systems will require comparing results to standard post-construction monitoring at land-based wind energy facilities. This comparison can be accomplished prior to constructing wind turbines on the Great Lakes (level of effort: >\$2 million, timeline 1-3 years).
- Conducting post-construction monitoring to quantify fatality rates of bats and birds. Validated strike detection systems can be installed on wind turbines to monitor fatality rates over multiple years (level of effort: \$1-\$2 million, timeline: 1-3 years).
- Assessing the turbine- and landscape-level behavior of bats (i.e., attraction) and birds (i.e., avoidance or attraction) in response to wind turbines on the Great Lakes. A minimum of 2 years is required to monitor behavior using one or more technologies (e.g., radar, cameras, lidar, and acoustic detectors). The technology or suite of technologies used will vary by development phase and scale of behavior. Behavior can be related to timing and weather conditions to understand how animals respond to the presence of

wind turbines (level of effort: \$1-\$2 million, timeline: 1-3 years).

Also note: The FWS.gov map; Figure 6-6: Migratory Bird Flyways on page 134, is misleading, suggesting that migratory birds avoid flying over Lake Michigan waters. Extensive research via NEXRAD radar and other studies provide clear evidence of the opposite; millions of migratory birds fly over the Lake's offshore waters – a well documented fact – BCN is prepared to provide extensive supporting evidence of that fact.

Please include BCN as an identified Stakeholder in this Report writing process. Please acknowledge receipt of this email. Thank you.

Regards  
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*BCN promotes public awareness, knowledge, appreciation and enjoyment of birds, and other wildlife and wildlife habitat, and both proposes and supports public and private programs designed to protect, restore, and enhance the natural environment, and conserve/increase native bird populations.*

*BCN seeks to inform the members of our coalition, public and private agencies and landowners in our region, and the general public, about specific threats to birds, and other wildlife and wildlife habitat – and to recommend appropriate action against these threats.*

*BCN actively coordinates the accumulation and maintenance of long-term monitoring records and other information on Illinois birds and their habitats, to be used as an aid to their perpetuation, and as an indicator of environmental quality.*

*BCN is a regional coalition of about 20 organizations (bird clubs, Audubon chapters, ornithological societies and conservation organizations) sharing an interest in the conservation of birds. The groups' members aggregate to more than 35,000 people living primarily in the Chicago area, but also throughout Illinois, northeastern Indiana, and southern Wisconsin.*



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