

**From:** Bob Fisher <[bfisher928@aol.com](mailto:bfisher928@aol.com)>

**Sent:** Thursday, October 19, 2023 9:40 PM

**To:** IPA.ContactUs <[IPA.ContactUs@Illinois.gov](mailto:IPA.ContactUs@Illinois.gov)>

**Subject:** [External] Bird Conservation Network– Policy Study House Bill 3445 Stakeholder Feedback

BCN was surprised by the short time frame provided in the September 29 announcement, for stakeholder comments. We have been rapidly compiling comprehensive information and comments relative to environmental/wildlife impacts.

We note that this question is given little attention in Section 2, quoted here:

h) What other uses of Lake Michigan would be impacted from development and operation of offshore wind projects? How could these impacts be mitigated? i) What considerations must be made for preserving Lake Michigan's natural resources during development and operation of offshore wind projects?

This statement lacks specificity, implying the issue of wildlife impacts is of marginal concern. That is not the case!

BCN, as a stakeholder to this endeavor and its intended and unintended consequences, offer certain specific published documents for the Stakeholder Feedback record. We urge IPA to specifically address the needs and concerns expressed in these documents and the comments below, during the development of the Report

- A recently published study by NREL (copy attached) in section 7, pages 73-77, identifies the necessity for a multiple year research timeline and millions in costs to effectively assess the feasibility of installing wind turbines in the Great Lakes while preventing/mitigating harm to wildlife, specifically birds and bats.
- Directly quoting from this NREL document, we urge inclusion of these NREL recommendations in the IPA Report.
- **Recommended research activities include:**
  - 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).
- BCN notes that Figure 26 on page 74 of the NREL is unintentionally misleading, suggesting that migratory birds avoid flying over Lake Michigan waters. Extensive recent research via NEXRAD radar is clear evidence of the opposite; millions of migratory birds fly over the Lake's offshore waters. This is a well documented fact, and BCN is prepared to provide extensive supporting evidence of that fact.
- While BCN makes no claims of having expertise in cost benefit analysis, we note that the New York State Energy Research and Development Authority (NYSERDA report attached), concluded that offshore wind energy development in the 2 Great Lakes bordering New York was not economically feasible, and hindered development of other, more cost effective renewable energy options. Please include BCN as an identified Stakeholder in this Report writing process. Please acknowledge receipt of this email. Thank you.

Bob Fisher,  
Communications Chair  
Bird Conservation Network  
[media@bcnbirds.org](mailto:media@bcnbirds.org)  
630 985 2956  
<http://bcnbirds.org/>



*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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