

# **RECOMMENDATIONS TO AVOID ADVERSE IMPACTS TO MIGRATORY BIRDS, FEDERALLY LISTED SPECIES, AND OTHER WILDLIFE FROM COMMUNICATION TOWERS AND ANTENNAE**

## **Guidance prepared by the U.S. Fish and Wildlife Service**

Wireless communication towers and antennae have greatly increased in number in recent years. Cumulatively, communication towers have a potentially significant impact on wildlife, especially migratory birds. All communication towers and antennae requiring authorization from the Federal Communications Commission (FCC) are subject to the environmental review procedures required by Section 7 of the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) and by the National Environmental Policy Act (NEPA) of 1969 (83 Stat. 852; 42 U.S.C. 4321 *et seq.*). The U.S. Fish and Wildlife Service (Service) routinely reviews proposed communication projects and provides recommendations to project proponents and the FCC to avoid adverse impacts to federally listed or proposed endangered and threatened species, migratory birds, and other wildlife.

All native migratory birds (e.g., waterfowl, shorebirds, songbirds, hawks, owls, vultures, falcons) are afforded protection under the Migratory Bird Treaty Act (MBTA) of 1918 (40 Stat. 755; 16 U.S.C. 703-712). Migratory birds are a federal trust resource responsibility, and the Service considers migratory bird concentration areas environmentally significant. Bird concentration areas include traditional migratory flight corridors (e.g., ridges, shorelines, river valleys); rookeries and other bird breeding areas; stopover, staging, or resting areas (e.g., land bounding large bodies of water, wetlands, forests, and natural grasslands); wildlife preserves (e.g., National Wildlife Refuges; State Parks, Forests, Wildlife Management Areas, and Natural Areas; private sanctuaries); and seasonal flight paths (e.g., between feeding and nesting or roosting areas).

Communication towers pose a collision hazard to birds in flight, especially some 350 species of night-migrating birds. Cumulatively, communication towers kill an estimated four to five million birds per year nationwide (Manville 2000). The risk of bird collisions is related to tower height, design, lighting, and location relative to migratory bird concentration areas. Most documented bird kills at communication towers involve tall, lighted structures, and birds migrating at night during inclement weather. During these events, birds attracted by the lights congregate and circle around the tower, with mortality resulting from collisions with guy wires, other birds, and the ground, or from exhaustion. However, occurrences of bird collision mortality at communication towers have also been documented during daytime and fair-weather conditions.

The Service recommends the following steps to avoid or minimize adverse impacts to migratory birds, federally listed or proposed endangered and threatened species, and other wildlife from communication towers and antennae:

1. Collocate communication antennae and other equipment on existing structures whenever possible to avoid new tower construction. Antennae have been mounted on rooftops; flagpoles; bell, cross, and clock towers; road signs; silos; and water and power line towers. Where attachment to an existing non-tower structure is not feasible, collocate antennae on existing communication towers. Depending on tower load factors, multiple (6-10) providers may collocate on a single communication tower. Although usually a preferred option, collocation on certain structures may be

- restricted, such as historic sites, or silos on farms under State or county deed restriction for farm preservation, which may prohibit non-agricultural activities.
2. Construct new towers only if collocation is not feasible. Design new towers to allow for multiple transmitters to be collocated on a single new tower, no more than 199 feet above ground level (AGL), without lights or guy wires. (Towers taller than 199 feet are normally required by the Federal Aviation Administration [FAA] to employ aircraft warning lights.)
  3. Consider the impacts of new towers to migratory birds, federally listed species, and other wildlife, cumulatively as well as individually when siting and designing networks of towers and antennae.
  4. Site towers away from wetlands; areas with a known high incidence of fog, mist, and low cloud ceilings; and habitats supporting threatened or endangered species.
  5. Construct taller (>200 feet AGL) towers only if collocation and shorter towers are not viable options. Use the minimum amount of pilot warning and obstruction avoidance lighting required by the FAA. Use only white (preferable) or red strobe lights at night unless otherwise required by the FAA, and employ the minimum number, minimum intensity, and minimum number of flashes per minute (longest duration between flashes) permitted by the FAA. Avoid solid red or pulsating red warning lights at night. (Current research indicates that solid or pulsating (beacon) red lights attract night-migrating birds at a much higher rate than white strobe lights. Red strobe lights have not yet been studied.)
  6. Construct guyed towers only if other tower designs (e.g., monopoles, lattice towers) are not viable options. Locate guyed towers away from known raptor and waterbird concentration areas and daily movement routes, and away from major diurnal migratory bird movement routes and stopover sites. If a guyed tower must be located in or near such an area, employ daytime visual markers on the wires. Do not use artificial lighting to increase visibility of the structure or guy wires; instead use reflective paint or materials, large balls, or other available technology. (For guidance on markers, see Avian Power Line Interaction Committee 1994 and 1996.)
  7. Avoid or minimize habitat loss within and adjacent to the "footprint" of new towers and associated facilities. (However, a larger tower footprint is preferable to the use of guy wires.) Minimize road access and fencing to reduce or prevent habitat fragmentation and disturbance, and to reduce above-ground obstacles to birds in flight.
  8. Avoid siting towers in or near known bird concentration areas (discussed on page 1); known bird migration or daily movement flyways; and areas known to be used habitually by significant numbers of breeding, feeding, or roosting birds. If such areas cannot be avoided, avoid construction during seasons of high bird activity.
  9. Design new towers structurally and electrically to accommodate the applicant's antennas and comparable antennas for at least two additional providers, for a

minimum of three providers for each tower, to reduce the number of towers needed in the future (unless such a design would require the addition of lights or guy wires to an otherwise unlighted and/or unguyed tower).

10. Down-shield security lighting for on-ground facilities and equipment to keep light within the boundaries of the site.
11. Allow Service personnel and affiliated researchers access to proposed and existing tower sites upon request to evaluate bird use; conduct dead-bird searches; place net catchments below the towers but above the ground; and place radar, Global Positioning System, infrared, thermal imagery, and acoustical monitoring equipment as necessary to assess and verify bird movements and to gain information on the impacts of various tower sizes, configurations, and lighting systems.
12. Provide for tower decommissioning, including removal, in any license application submitted to the FCC. Remove towers no longer in use or determined to be obsolete within 12 months of cessation of use.

### **LITERATURE CITED**

- Avian Power Line Interaction Committee. 1994. Mitigating bird collisions with power lines: The state of the art in 1994. Edison Electric Institute, Washington, D.C. 78 pp.
- \_\_\_\_\_. 1996. Suggested practices for raptor protection on power lines. Edison Electric Institute/Raptor Research Foundation, Washington, D.C. 128 pp.
- Manville, A.M. II. 2000. The ABCs of avoiding bird collisions at communication towers: the next steps. Proceedings of the Avian Interactions Workshop. Electric Power Research Institute. 15 pp.

### **FURTHER INFORMATION**

- Bibliography of bird kills: <http://migratorybirds.fws.gov/issues/towers/review>
- Federal Communications Commission, Wireless Telecommunication Branch - Siting Issues  
<http://www.fcc.gov/wtb/siting>
- Federal Communications Commission Telecommunications Act of 1996  
<http://www.fcc.gov/telecom.html>
- General Information: <http://migratorybirds.fws.gov/issues/towers/abcs.html>
- Ogden, L.J.E. 1996. Collision Course: The hazards of lighted structures and windows to migrating birds. World Wildlife Fund Canada and the Fatal Light Awareness Program. Toronto, Ontario, Canada. 46 pp.
- Towerkill.com. <http://www.towerkill.com>
- U.S. Fish and Wildlife Service Endangered Species Home Page. <http://endangered.fws.gov>
- U.S. Fish and Wildlife Service, Division of Migratory Bird Management, Bird Issues.  
<http://migratorybirds.fws.gov/issues/tblconthtml>
- U.S. Fish and Wildlife Service, Division of Migratory Bird Management, Service Guidelines.  
<http://migratorybirds.fws.gov/issues/towers/comtow.html>