

Communication tower recommendations

(only for towers that are greater than 200 feet with guy wires)

The proposed tower(s) is greater than 200 feet in height and incorporates guy wires, and as such could potentially impact migratory birds, which are a Federal trust resource that the Service is authorized to protect. The Service is concerned that the number and distribution of existing towers, those currently authorized for construction, as well as the projected future increased number of such towers, could potentially affect neotropical migratory birds. Many neotropical migratory bird populations have been declining over the past 30 years, and the presence of communications towers in migration corridors may exacerbate those declines via increased bird mortality. Communication towers, especially those with lights and guy wires, are known to cause collision-related mortality in nocturnally migrating land birds, especially during bad weather (e.g., fog and storm fronts). In some cases, the Federal Communications Commission has required tower licenses to consider impacts on migratory birds by placing conditions on the license to include such mitigative measures as marking the tower and guy wires with appropriate warning balls and streamers, and/or installing beacon or strobe lights designed to reduce attraction of birds.

The Service is working to develop a comprehensive approach to this issue. However, because the reliability of bird-mortality data is relatively poor and anecdotal, research is still needed to document and quantify the impact of various types and sizes of towers on migratory birds. Research is also needed to identify appropriate tower designs and operational programs that would help to avoid or minimize the potential for bird/tower collisions. We encourage the participation of the communications industry in developing a research program to identify appropriate tower designs and other effective ways to mitigate tower impacts to migratory birds.

The Service strongly supports the co-location of antennas from multiple communication sources on the same tower; however, if co-location is not feasible, we recommend considering the following:

On a priority scale, relatively low-risk locations for communication towers would include urban and suburban areas; potential impacts to migratory birds would progressively increase in rural areas, especially wetlands, prairie grasslands, coastal cheniers, barrier islands, and forests. If habitat issues do not preclude use of a proposed site, the Service recommends that new towers be less than 200 feet tall, without guy wires or lights, because such towers are associated with a lower risk of bird mortality. Where practicable, taller towers, with or without guy wires and/or lights, should be located out of sensitive habitats to reduce the likelihood for bird collisions.

Additionally, we recommend the use of white strobing lights in lieu of constant or red lights on all cell towers and it is recommend that all facility security lighting is directed downward to prevent bird attraction. In December 2015, the Federal Aviation Administration released a revised “Obstruction Marking and Lighting” Advisory Circular requiring all towers greater than 150 feet above ground level to use flashing obstruction lights. Research has demonstrated that eliminating non-flashing lights on towers may reduce migratory bird collisions by as much as 70 percent. The lighting and marking standards are revised to reduce impacts on migratory bird

populations and minimize light impacts on adjacent communities. For further guidance on best management practices for communication tower siting, design and operations to help minimize or avoid impacts to birds, [please visit the Service's Migratory Bird Program web page](#).

The Migratory Bird Treaty Act prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the U.S. Department of the Interior. While the Act has no provision for allowing unauthorized take, the Service realizes that some birds may be harmed or killed as a result of collision with tower structures even when reasonable measures to protect birds are implemented. The Service's Office of Law Enforcement (LE) carries out its mission to protect migratory birds through investigations and enforcement, as well as by fostering relationships with individuals, companies, and industries that have taken effective steps to minimize their impacts on migratory birds, and by encouraging others to enact such programs. As such, LE focuses its resources on investigating and prosecuting individuals and entities that take migratory birds without regard for their actions or without effort to implement Service recommendations/conservation measures. The Louisiana Ecological Services Office would be willing to work with all cell tower developers to minimize impacts to migratory birds where practicable.