

As a veteran volunteer ?citizen scientist,? I have retrieved bird carcasses from beneath towers here in West Virginia. Those experiences lead me to urge some considerations as the FCC examines the issue of tower kills.

? A comprehensive PEIS is warranted, rather than a PEA. More than sufficient data exists to indicate this action.

? The Commission should conduct a nationwide assessment of bird kills at communication towers.

? Data on flyways, tower location, lighting, height, and guy wires should be noted. Most birds I found were under guy wires. Those of us who recognize the worth and value of birds, and their place in a sustainable environment wish to know how all the small pieces of information can help plan toward safety for birds.

? The full range of significant impacts should be assessed, especially as broadband proliferates.

? There should be inclusion of alternative regulatory approaches that will minimize bird impacts.

? Identification and evaluation of environmental effects should be conducted by FCC personnel.

? There should be input from state and other federal agencies.

? Documentation of minimal impacts from towers should be part of NEPA review.

Thank you for attending to all suggestions to make the most effective resolution concerning deaths of birds at towers.

Sincerely,  
Cynthia D. Ellis

[affiliations: Brooks Bird Club, West Virginia Highlands Conservancy]