

As a supporter of the National Audubon Society and someone who cares about migratory birds, I am writing today to urge the Federal Communications Commission (FCC) to conduct an Environmental Impact Statement with respect to communications towers and their impacts on migratory birds.

According to the Fish & Wildlife Service, each year millions of birds are killed by communications towers and related structures across the United States. Around 230 species of birds -- more than one-quarter of all avian species found in the U.S. -- have been documented as being killed by towers.

Federal laws -- including the National Environmental Policy Act, the Endangered Species Act, and the Migratory Bird Treaty Act -- require the FCC to adopt measures to prevent, or at least minimize, bird fatalities caused by communications towers.

A Programmatic Environmental Impact Statement (PEIS) is needed to analyze in detail all of the identified impacts, including direct, indirect and cumulative impacts, and the full range of alternatives, so that common sense decisions can be made about siting of towers, height allowances, lighting regimes and other factors that have been proven to impact migratory birds. These changes can often be done inexpensively and with no risk to aviation safety, and will effectively reduce bird mortality.

The FCC should consider alternatives that include less harmful lighting schemes, FCC personnel review of applications for construction of new towers (rather than the applicant), and consultation with appropriate agencies as directed by the Endangered Species Act and the Migratory Bird Treaty Act.

Please quickly adopt these recommendations and move forward in developing a full PEIS that safely reduces further bird deaths from antennas and structures regulated by the FCC.

Thank you for your consideration of this important conservation issue.