



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

New England Field Office  
70 Commercial Street, Suite 300  
Concord, NH 03301-5087

<https://www.fws.gov/office/new-england-ecological-services>



February 5, 2025

To Whom It May Concern:

Due to the rapid expansion of the telecommunication industry, we are receiving many requests for review of existing and new telecommunication facilities in relation to the presence of federally listed threatened or endangered species and designated critical habitat. The U.S. Fish and Wildlife Service's (Service) New England Field Office has determined that individual project review for certain types of activities associated with communication towers in Connecticut, Massachusetts, New Hampshire, Rhode Island, and Vermont is not required. We are submitting these comments in accordance with provisions of the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

### Existing Telecommunication Facilities

We evaluated our review process for communications towers and determined that individual correspondence with this office is not required for the following types of actions relative to existing facilities:

1. the re-licensing of existing telecommunication facilities;
2. audits of existing facilities associated with acquisition;
3. routine maintenance of existing tower sites, such as painting, antenna or panel replacement, upgrading of existing equipment, etc.;
4. co-location of new antenna facilities on/in existing structures;
5. repair or replacement of existing towers and/or equipment, provided such activities do not substantially increase the existing tower mass and height, or require the addition of guy wires.

In order to preclude the need to contact this office in the future for individual environmental review for existing communication towers or antenna facilities, please note that we are not aware of any federally listed, threatened, or endangered species that are being adversely affected by any existing communication tower or antenna facility in Connecticut, Massachusetts, New

Hampshire, Rhode Island, and Vermont. Furthermore, we are not aware of any existing telecommunication towers in federally designated critical habitats in these states. Therefore, no further consultation with this office relative to the impact of the above referenced activities on federally listed species is required.

### New Telecommunication Facilities

We determined that proposed projects will have no effect on, or are not likely to adversely affect, any federally listed or proposed species when:

1. the facility will be installed within or on an existing structure, such as in a church steeple or on the roof of an existing building. Similarly, new antennas or towers in urban and other developed areas, in which no natural vegetation will be affected, do not require further review.
2. the proposed project's official species list from our Information for Planning and Consultation (IPaC) website (<https://ipac.ecosphere.fws.gov/> (accessed February 2025)) indicates no federally listed or proposed endangered or threatened species may be present in the proposed project area.
3. the results of relevant Determination Keys on our IPaC website are not likely to adversely affect or no effect (NLAA or NE) for all species on a project's official species list.
4. after following the guidance on our project review website (<https://www.fws.gov/office/new-england-ecological-services/endangered-species-project-review> (accessed February 2025), you can determine the project would have no effect on listed or proposed species. Our past experiences indicate that communication facilities often have limited, if any, effects on listed species.

A copy of this letter can be retained in your file as the Service's determination that no listed species are present, or that listed species will not be affected. Due to the high workload associated with responding to many individual requests for threatened and endangered species information, we will no longer be providing response letters for activities that meet the above criteria. This correspondence remains valid until January 31, 2026.

Updated official species lists can be obtained at <https://ipac.ecosphere.fws.gov/>.

### Migratory Birds

Every year, millions of migratory birds die due to nighttime collisions with communication towers. The Service is aware of several features of towers that can increase risk of collision; however, one of the best ways to reduce collisions is by switching from non-flashing to flashing lights on towers. This can reduce migratory bird collisions by as much as 70 percent while simultaneously reducing energy costs for tower owners. Additional information on reducing risk to birds from towers is available here: <https://www.fws.gov/story/incidental-take-beneficial-practices-communication-towers-how>.

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Thank you for your cooperation, and please contact us at 603-223-2541 or [newengland@fws.gov](mailto:newengland@fws.gov) if you need further assistance.

Sincerely,

Acting for Audrey Mayer  
Supervisor  
New England Field Office