Black Swamp Bird Observatory

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November 13, 2026

The Honourable Julie Dabrusin
Minister of the Environment, Climate Change and Nature
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Daisy Hsu, Project Manager
Impact Assessment Agency of Canada, Ontario Region
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Subject: Pelee Island Telecommunications Tower Project – request for designation under subsection 9(1) of the *Impact Assessment Act* – Black Swamp Bird Observatory support for the Pelee Island Bird Observatory's request of October 6, 2026

Dear Minister Dabrusin and Ms. Hsu:

Black Swamp Bird Observatory (BSBO) writes to object to the telecommunications towers proposed for Pelee Island, Ontario, and to support the Pelee Island Bird Observatory's request of October 6, 2026, that the Minister designate DRW NX Co.'s proposed 182.9-metre (600-foot) guyed antenna structure at 1246 Centre Dyke Road under subsection 9(1) of the *Impact Assessment Act*. We also ask that any assessment consider the cumulative effects of the second tall tower proposed on the island by Shared Tower Inc., west of Curry Dyke Road.

BSBO is a 501(c)(3) nonprofit research and education organization based in Oak Harbor, Ohio, on the southwestern shore of Lake Erie, less than 40 kilometres (25 miles) from Pelee Island. Since 1989, BSBO has conducted standardized spring and fall migration monitoring at its Navarre Marsh banding station in Ottawa National Wildlife Refuge, banding more than 400,000 birds of 150 species.[1] This long-term dataset helped the National Audubon Society designate the Lake Erie Western Basin as a Globally Important Bird Area, and our monitoring protocol serves as the model for the Midwest Migration Network.

The birds we study in Ohio and the birds that rely on Pelee Island are, in large part, the same birds. Western Lake Erie's chain of islands, with Pelee the largest, offers migrants a stepping-stone route across an otherwise formidable water barrier, and acoustic

monitoring has shown how important these islands are to birds making the crossing.[2] A tower that kills birds on Pelee Island directly reduces the populations that BSBO, our partners, and the United States and Canadian governments have monitored and invested in for more than three decades.

Any assessment should also recognize that the air column above Pelee Island is itself habitat. Ecologists have shown that the airspace satisfies both the definition and the functional role of habitat, just as land and water do: it is where migratory birds travel, find favourable winds and conditions, and spend a critical portion of their lives, and recognizing it as habitat has direct implications for how development within it is assessed and regulated.[3] Canadian researchers have further shown that current habitat definitions place aerial species at a disadvantage in environmental policy, and that tall structures and other human uses of the sky fragment this habitat much as roads and development fragment habitat on the ground.[4] Each spring and fall, the lowest few hundred metres of air over Pelee Island are used intensively by migrants descending to land after crossing Lake Erie and climbing out again to continue their journeys. A 182.9-metre tower and its guy wires would occupy precisely that layer. Evaluating the project only by its footprint on the ground would overlook the habitat it would most affect.

The proposed design presents exactly the conditions that research associates with the greatest mortality. In a study of 24 towers, guyed communication towers had 16 times more fatalities than unguyed (self-supporting) towers of the same height, and the tallest guyed towers had about 70 times more.[5] At 182.9 metres, the DRW structure is taller than the medium-height guyed towers in that study. Steady-burning obstruction lights draw night-migrating birds into the tower zone, where they circle until exhausted or collide with the structure and its guy wires; removing steady-burning lights has been shown to reduce fatalities at guyed towers by roughly 50 to 71 per cent.[6] Communication towers in the United States and Canada are estimated to kill about 6.8 million birds each year.[7] Placing a tall, guyed, lit tower at the first landfall for birds that have just crossed Lake Erie, often at night, tired and flying low in poor weather, would concentrate that risk on one of the most important stopover sites in the Great Lakes.

For these reasons, Black Swamp Bird Observatory respectfully requests that the Minister:

1. Designate the DRW NX Co. tower under subsection 9(1) of the *Impact Assessment Act*, as requested by the Pelee Island Bird Observatory;
2. Require that any assessment evaluate alternative sites and designs, including unguyed structures of the minimum necessary height, and flashing-only lighting with no steady-burning lights;
3. Assess the cumulative effects of all tall towers proposed on Pelee Island; and

4. Require consultation with the Canadian Wildlife Service, the Pelee Island Bird Observatory and other bird research organizations, and standardized post-construction mortality monitoring for any structure that proceeds.

Thank you for considering our concerns.

Sincerely,



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cc: Jeff Schaffhauser, Executive Director, Pelee Island Bird Observatory

[1] Black Swamp Bird Observatory, Migration Monitoring. www.bsbo.org/migration-monitoring.html

[2] Sanders, C., and Mennill, D.J. 2014. Acoustic monitoring of migratory birds over western Lake Erie: avian responses to barriers and the importance of islands. *The Canadian Field-Naturalist, 128*(2). https://doi.org/10.22621/cfn.v128i2.1577

[3] Diehl, R.H. 2013. The airspace is habitat. *Trends in Ecology and Evolution, 28*(7): 377–379. https://doi.org/10.1016/j.tree.2013.02.015

[4] Davy, C.M., Ford, A.T., and Fraser, K.C. 2017. Aeroconservation for the fragmented skies. *Conservation Letters, 10*(6): 773–780. https://doi.org/10.1111/conl.12347

[5] Gehring, J., Kerlinger, P., and Manville, A.M. 2011. The role of tower height and guy wires on avian collisions with communication towers. *The Journal of Wildlife Management, 75*(4). DOI: 10.1002/jwmg.99

[6] Gehring, J., Kerlinger, P., and Manville, A.M. 2009. Communication towers, lights, and birds: successful methods of reducing the frequency of avian collisions. *Ecological Applications, 19*(2).

[7] Longcore, T., Rich, C., Mineau, P., MacDonald, B., Bert, D.G., et al. 2012. An Estimate of Avian Mortality at Communication Towers in the United States and Canada. *PLoS ONE 7*(4): e34025. doi:10.1371/journal.pone.0034025