

Allan Strong, South Burlington, VT.
To whom it may concern:

My name is Allan Strong. I am the Interim Dean of the Rubenstein School of Environment and Natural Resources at UVM and currently serve as the Chair of Vermont's Endangered Species Committee. I have been studying the nesting ecology of grassland birds for over 20 years; my colleagues and I have published over 25 peer-reviewed journal articles on the ecology and life history of grassland birds in the Northeast. Much of our work has focused on the impacts of agricultural practices on the reproductive success and behavior of these declining species.

Hay harvest during the nesting season destroys the nests of all grassland birds in a field. Some species, like the Savannah Sparrow, are able to successfully renest after a hay cut. However, more sensitive species like the Bobolink and Eastern Meadowlark are much less likely to successfully renest after harvest. These two species both show rapid population declines (2.5%/year for the Bobolink, 7.2%/year for the Eastern Meadowlark, USGS Breeding Bird Atlas data see: <https://www.mbr-pwrc.usgs.gov/>), such that the Eastern Meadowlark is now listed as a threatened species in Vermont and the Upper Meadows site is one of the last remaining nesting sites in the Connecticut River Valley.

Delayed mowing is a simple management strategy to enable these declining species to reproduce successfully. Requiring delayed mowing of the Upper Meadows (after 1 August) as a requirement of FERC relicensing would be an effective mitigation strategy to compensate for the environmental impacts of GRH. As the licensing agreement will be in place for 40 years, requiring delayed mowing is a cost-effective opportunity to ensure the long-term viability of the grassland bird populations using this important habitat.

This is a unique chance to enhance the biodiversity for an important group of declining birds. I hope you will take advantage of this opportunity.

Sincerely,
Allan Strong, PhD

Document Content(s)

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