



December 19, 2017

Nancy Daubenberger  
Transportation Department  
395 John Ireland Blvd  
120  
St Paul, MN 55155-1899

Dear Nancy Daubenberger:

Roadside habitat is an essential link in the life cycle requirements for many species of birds, mammals, and invertebrates. In recognition of the importance of these wildlife corridors, the Minnesota Chapter of the Wildlife Society (MN TWS) offers the following comments in response to the State of Minnesota's recent request for comments on roadside haying and mowing activities:

- Permitted mowing activities should not occur prior to July 15, to avoid conflict with avian nesting and brood rearing activities which occur throughout early summer (May-July).
- Flowering plants in roadsides are important nectar and pollen resources for resident and migratory (e.g. Monarch) pollinators. Reducing floral cover multiple times during the growing season reduces vegetative diversity, transitioning roadsides into a grass-dominated habitat.
- Best management practices should be a standard in all permitted activities,. Examples of beneficial requirements mowing dates tailored to avoid wildlife conflicts; spot spraying herbicide for invasive weeds in conjunction with partial ditch mowing, invasives-free mowing equipment, and clipping roadsides no lower than 10-12 inches after September 1 to create winter and early Spring nesting cover.
- Considerable resources are expended when seeding a newly disturbed roadside; roadside seed mixes contain species specifically tailored to benefit multiple habitat and wildlife goals. Permitted activities should be as compatible as possible with established wildlife guidelines for roadsides.
- Many roadsides on State, U.S., and Interstate highways are owned via fee-tittle by the State of Minnesota. Consequently, it is critical that permitted activities align with MnDOT's responsibility to maintain road infrastructure and provide habitat as required by MN Executive Order 16-07.
- If the State of Minnesota chooses to authorize haying under permit, permittees should compensate the State for resources received and to cover administrative costs.

Roadsides are a public right of way that provide a resource for an abundance of plants and animals statewide. In addition, roadsides are sometimes the only continuous habitat available in heavily farmed

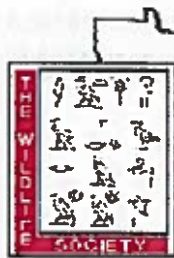
areas. When done responsibly and with proper oversight, haying can be one management tool to meet the goals of roadside habitat and its maintenance. MN TWS recommends managing roadsides for the full suite of intended goals, including quality wildlife habitat.

Sincerely,



Laurie Fairchild  
President

Minnesota Chapter of the Wildlife Society



## *The Minnesota Chapter of The Wildlife Society*

December 19, 2017

Tina Markeson  
Transportation Department  
395 John Ireland Blvd  
660  
St Paul, MN 55155-1899

Dear Tina Markeson:

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Sincerely,



Laurie Fairchild  
President

Minnesota Chapter of the Wildlife Society