



Hon. Thomas E. Dernoga  
Hon. Deni L. Taveras  
Prince George's County Council

Dear Council Member Dernoga and Council Member Taveras,

Founded in 1897, the Audubon Naturalist Society (ANS) is the oldest, independent environmental organization protecting nature in the DC metro region. On behalf of the 28,000 people we serve each year, ANS supports your initiative to amend the Prince George's County "weed" height ordinance (Sec. 13: 261, 262, 264), with the goal of allowing landowners in unincorporated areas of the County to manage property in a wildlife-friendly manner.

Prince George's County can and should play a leadership role in creating policies that protect our region's precious and declining meadow habitats. Meadows create natural infrastructure that has multiple ecological benefits. Allowing meadows to grow not only benefits wildlife, but also helps mitigate negative effects of climate change. Meadows serve as carbon sinks that reduce greenhouse gasses from being released into the atmosphere. Meadows filter stormwater and improve water quality. Meadows reduce stormwater runoff. And meadows provide healthy habitats for wildlife including the small mammals, birds, insects, and amphibians that are essential to healthy ecosystems. Meadows in Prince George's County can help the county achieve its Climate Action Plan for reducing 50 percent of its emissions by 2030 and become carbon neutral by 2050.<sup>1 2</sup>

Meadow habitats are essential to the health and well-being of birds and pollinators. This is especially critical given that grassland bird species, those that rely on meadows as habitat, have exhibited a 53 percent decline in the past fifty years<sup>3</sup>. At the same time, the decline in insect populations, many of which rely on meadow and grassland ecosystems to thrive, negatively

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<sup>1</sup> Prince George's Climate Action Plan. Climate Action Plan. January 15, 2022. Page 4. Available at: <https://www.princegeorgescountymd.gov/3748/Climate-Change>

<sup>2</sup> ANS's Comments on Prince George's Climate Action Plan. 2021. Available at: <https://conservationblog.anshome.org/blog/pgco-draft-cap/>

<sup>3</sup> Rosenberg, Kenneth V., Dokter, Adriaan M., Blancher, Peter J., Sauer, John R., Smith, Adam C., Smith, Paul A., Stanton, Jessica C., Panjabi, Arvind, Helft, Laura, Parr, Michael, and Marra, Peter P. *Decline of the North American avifauna*. Retrieved from <https://par.nsf.gov/biblio/10133018>. *Science* 366.6461 Web. doi:10.1126/science.aaw1313.

impact agricultural production and destabilize local and global ecosystems.<sup>4</sup> Habitat loss is a major driver of both of these crises, and Maryland is no exception. Meadow habitats are in sharp decline across the state.

There is enormous opportunity to create meadow habitats on land owned by Pepco, one of the largest private landowners in Prince George's County. By amending the current "weed" height ordinance, Prince George's County can achieve tremendously positive environmental impact by reducing mowing and allowing meadows to thrive under power line rights-of-way (ROWs) owned by Pepco. When powerline ROWs return to meadow habitat, hundreds of acres of Prince George's County open space will provide rich, biodiverse corridors.

In anticipation of your amendments to the ordinance, we encourage you and your offices to exhort Pepco to immediately begin managing the powerline ROWs in Districts 1 and 2 for meadow habitat. By following the five standards set out below, Prince George's County powerline corridors will conform to best meadow management practices used by the U.S. National Park Service<sup>5</sup>, Maryland Department of Natural Resources<sup>6</sup>, Montgomery Parks<sup>7</sup>, Audubon Naturalist Society<sup>8</sup>, the Virginia Department of Wildlife Resources, Fairfax County and Baltimore Gas and Electric<sup>9</sup>, as well as the Xerces Society *Guide to Mid Atlantic Native Meadows* (2020)<sup>10</sup> and the Utility Arborist Association's *Managing Compatible Vegetation for Targeted Species and Biodiversity* (2021).<sup>11</sup>

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<sup>4</sup> Forister, ML, Pelton, EM, Black, SH. Declines in insect abundance and diversity: We know enough to act now. *Conservation Science and Practice*. 2019; 1:e80. <https://doi.org/10.1111/csp2.80>

<sup>5</sup> US NPS Invasive Plants. Available at: <https://www.nps.gov/subjects/invasive/plants.htm>

<sup>6</sup> MD DNR – Creating a wild backyard – wildlife meadows. Available at: <https://dnr.maryland.gov/wildlife/pages/habitat/wawildflowers.aspx>

<sup>7</sup> Montgomery Parks – Meadow Management and Restoration Program. Available at: <https://montgomeryparks.org/projects/directory/meadow-management-and-restoration-program/>

<sup>8</sup> Audubon Naturalist Society's Woodend Meadow Restoration. Available at: <https://anshome.org/woodend-meadow/>

<sup>9</sup> BGE Integrated Vegetation Management Sites Named Certified Wildlife Habitats by National Wildlife Federation. 2015. Available at: <https://www.bge.com/News/Pages/Press%20Releases/BGE-Integrated-Vegetation-Management-Sites-Named-Certified-Wildlife-Habitats-by-National-Wildlife-Federation.aspx>

<sup>10</sup> Sturm, A., and S. Frischie. 2020. Mid- Atlantic Native Meadows: Guidelines for Planning, Preparation, Design, Installation, and Maintenance. Portland, OR: The Xerces Society for Invertebrate Conservation. Available at: <https://xerces.org/publications/guidelines/mid-atlantic-native-meadows>

<sup>11</sup> Utility Arborists Association. 2021. Managing Compatible Vegetation for Targeted Species and Biodiversity. Available at: <https://www.gotouaa.org/biodiversity-tools/>

We applaud your efforts to create an ordinance that will call for these steps in managing powerline ROWs:

- (1) Mow any one section of ROWs at most once per year (with a “section” being a portion of ROW between two public roadways).
- (2) Employ “strip” or “patch” mowing so that no more than half of any section of ROW is mowed in any given year, providing habitat continuity.
- (3) Mow only in February or March to provide wildlife cover and forage through the fall and winter months.
- (4) Where the ROW crosses residential areas with no shrubby or wooded border, frequently mow a perimeter of approximately ten-foot width on both sides of the ROW.
- (4) Install signage to inform neighbors about the new mowing practices and their benefits to wildlife and residents alike.

If Pepco implements these provisions in Districts 1 and 2 for the 2022 growing season, Districts 1 and 2 will provide Pepco a County-wide model – and ideally become a regional exemplar -- that demonstrates best practices for providing intact and invaluable wildlife corridors. An added benefit will be creating beautiful natural areas that connect parklands from West Laurel to Chillum.

Thank you for leading the effort to amend the County’s “weed” height ordinance (Sec. 13: 261, 262, 264) and to create new ordinances to govern powerline ROWs . All of us at ANS appreciate your leadership in addressing the biodiversity crisis, the challenge of climate change, and the rights of all our communities to have access to ecologically healthy natural areas.

Sincerely,

Denisse Guitarra  
ANS Maryland Conservation Advocate

Alice Sturm, PLA  
ANS Garden Manager and  
Author, *Xerces Society Guide to  
Mid-Atlantic Native Meadows* (2020)

cc: Michael Wilpers, Friends of Sligo Creek; Dawn Hawkins-Nixon, Chair, Prince George’s Climate Action Commission, and Associate Director, Prince George’s Department of the Environment; Andrea L. Crooms, Director, Prince George’s Department of the Environment; Melinda Bolling, Director, Prince George’s Department of Permitting, Inspections and Enforcement; Prince George’s County Council

Woodend Sanctuary | 8940 Jones Mill Road, Chevy Chase, Maryland 20815 | 301-652-9188

Rust Sanctuary | 802 Childrens Center Road, Leesburg, Virginia 20175 | 703-669-0000

[anshome.org](http://anshome.org)