

December 2, 2020

Sonny Perdue, Secretary
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Vicki Christiansen, Chief
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Secretary Perdue and Chief Christiansen,

At a time when pollinator health and pollination services face significant challenges, U.S. Forest Service lands are critical for honey bees and for the sustainability of U.S. agriculture. Honey bees contribute \$19 billion in farm income annually, and poor nutrition is a major factor in hive losses every year.

Public lands – including those managed by the U.S. Department of Agriculture (USDA) U.S. Forest Service (USFS) and other federal agencies – provide hundreds of millions of acres of habitat for managed and native pollinators nationwide. Beekeepers rely on access to public and private lands to provide nutrition for their honey bee colonies that, in turn, ensure successful crop pollination and production. Because beekeeping is an agricultural land use vital to ensuring the nation's food supply, the placement of honey bee colonies on public lands is consistent with the multiple use mandates of USFS, and arguably has a smaller footprint than that of other agricultural and energy development uses.

The importance of public lands to honey bees as well as the need for best practices and science to inform the issue has been consistently recognized by federal agencies, including through the 2015 *National Strategy to Promote the Health of Honey Bees and Other Pollinators*, the USDA's 2014 Honey Bee Forage and Nutrition Summit, and the September 2020 Pollinator State of the Science Workshop hosted by USDA and the U.S. Environmental Protection Agency (EPA).

We the undersigned (representing beekeepers, farmers, conservationists, and agriculture business leaders) believe that USFS lands must be managed to provide habitat for both managed and native bees while supporting U.S. agriculture and healthy ecosystems. We believe that *more* acres of both public and private pollinator habitat are needed to support all pollinator species.

When making decisions regarding placement of honey bee colonies on USFS lands, we respectfully request that USFS land managers and policymakers at the national, regional, forest and district level consider the following:

1. continue to apply multiple use mandates of USFS that include agricultural uses such as beekeeping and that reasonably balance multiple interests across USFS lands; consider the benefits of honey bees for agricultural production and national food supply;
2. make decisions supported by risk-benefit analysis using a weight-of-evidence approach that considers multiple sources of information and lines of evidence regarding placement and benefits of honey bee colonies on USFS lands and the management of USFS lands as it impacts pollinator habitat; science regarding native and managed bee interaction is still emerging and complex, current science is inconclusive and additional research is encouraged;
3. provide access for beekeepers within a land management framework that offers consistency, clarity, equity, predictability and timely response to beekeepers' permit requests; although permit decisions are made at the local level, we encourage national guidance and consistency in application of multiple use mandates, the National Environmental Policy Act, and risk-benefit analysis;
4. support approaches that provide habitat for honey bees and all pollinators;

5. when considering interactions of native and managed pollinators, consider variability in spatial and temporal ecological carrying capacities, sensitivity of landscapes, sensitivities for listed species of concern, and differences in plant preferences of different pollinator species;
6. engage and consider diverse stakeholder input from various sectors and interests when considering policies and/or decisions impacting honey bees on public lands.

A July 2020 petition by other organizations to USFS to restrict the placement of honey bees on USFS lands threatens the health of honey bees and our agricultural systems and is based on inconclusive science. Recent studies have attempted to understand the potential impacts of managed honey bees on native pollinators. Thus far, the results are inconclusive, as demonstrated by the most comprehensive peer-reviewed literature review of existing studies (Mallinger et. al, 2017, *Do managed bees have negative effects on wild bees?: A systematic review of the literature*) showing positive, neutral and negative impacts on floral resource competition. Only this spring, USDA scientists began a study to specifically investigate interactions among native and managed bees in Utah USFS lands. The results of this research and other studies will be important to our understanding of these dynamics.

We need more science and more stakeholder input to inform future policy and management decisions that support the health of all pollinators for sustainable agriculture and thriving ecosystems. We welcome the opportunity to engage with you and other public land users and interest groups in such conversations. For additional information or to coordinate further discussion with the signatories of the letter, please contact the third-party facilitator for the signatories: Matthew Mulica, Keystone Policy Center, mmulica@keystone.org; (303)531-5511.

Sincerely,

Almond Board of California
American Beekeeping Federation
American Honey Producers Association
Bayer Crop Science
Bee Culture Magazine, Jerry Hayes, Editor
Eastern Apicultural Society
Dr. Frederick Proni, EAS Master Beekeeper
Levin Family Foundation
FieldWatch
Florida Fruit and Vegetable Association
Project Apis m.
Syngenta LLC
The Bee & Butterfly Habitat Fund
U.S. Canola Association
Western Apiculture Society

CC:

Administrator Chavonda Jacobs-Young, USDA, Agricultural Research Service

Dr. Scott Hutchins, Deputy Under Secretary, USDA Research, Education, and Economics

Mr. Chris French, Acting Deputy Chief, USDA, U.S. Forest Service

Ms. Elizabeth Hill, Honey Bee and Pollinator Research Coordinator, USDA, Office of the Chief Scientist

Mr. Jim Smalls, Ecosystem Management Coordination, USDA U.S. Forest Service

Ms. Alix Cleveland, Assistant Director Botany, Invasive Species, Landscape Ecology, Reforestation and Nurseries, Silviculture, and Soils, USDA U.S. Forest Service