

Nov. 1, 2018

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

The Honorable Ryan Zinke
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Secretary Perdue and Secretary Zinke,

At a time when pollinator health and pollination services face significant challenges, beekeepers across the country are reporting instances of being denied permits or having existing permits to public lands revoked based upon interpretations and assumptions of negative impacts on native bee populations. The beekeeping community is in the process of documenting these incidents, but we cannot afford to lose honey bee forage opportunities on public lands based on inconclusive data. 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. Forest Service (USFS), the U.S. Bureau of Land Management (BLM), the National Park Service, U.S. Fish and Wildlife Service, and other federal agencies – provide millions of acres of pollinator forage nationwide. Beekeepers rely on access to public lands (as well as 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, the placement of honey bee colonies on public lands is consistent with the multiple use mandates of USFS and BLM. The footprint of beekeeping on public lands is arguably much less than that of other agricultural and energy development uses. The importance of public lands to honey bees has been consistently recognized by federal agencies, including through the 2015 *National Strategy to Promote the Health of Honey Bees and Other Pollinators*, which includes best practices for pollinators – including honey bees – on federally managed lands. This was also a topic of emphasis at USDA's 2014 Honey Bee Forage and Nutrition Summit.

When making decisions regarding placement of honey bee colonies on public lands, we the undersigned (representing beekeepers, farmers, sports enthusiasts, conservationists, and agriculture business leaders) respectfully request that public land managers and public land policymakers consider the following:

1. continue to apply multiple use mandates of USFS and BLM that include agricultural uses such as beekeeping,
2. recognize that science regarding native and managed bee competition is still emerging and that current science is inconclusive; additional research is encouraged;
3. in the absence of scientific consensus, refrain from changes in multiple use policies for public lands as well as changes to national or local guidance and management affecting access of bee colonies on public lands, and
4. engage diverse stakeholder input when considering policies and/or decisions impacting honey bees on public lands.

Recent studies have attempted to understand the potential impacts of managed honey bees on native pollinators. Thus far, the results are inconclusive, with the most recent, 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. Additional research is needed.

With the science still emerging, it is too early to make changes to national or local policy, guidance or management regarding the placement of managed honey bee colonies on public lands. We need more science and more stakeholder input to inform future policy and management discussions. We welcome the opportunity to engage with you and other public land users and interest groups in such conversations.

Sincerely,

Almond Board of California
American Beekeeping Federation
American Honey Producers Association
American Seed Trade Association
BASF Corporation, Agricultural Solutions
Corteva Agriscience
Eastern Apicultural Society
Eastern Missouri Beekeepers Association
Ellen S. Dierenfeld, LLC
Foundation for the Preservation of Honey Bees
Pheasants Forever, Inc.
Project Apis m.
Propolis Projects, LLC
Saint Louis Zoo Center for Native Pollinator Conservation
Sweet Bee Honey Co.
Syngenta, LLC
The Bee & Butterfly Habitat Fund
US Canola Association
Vita Bee Health
Western Apicultural Society

cc:

Bill Northey, USDA Under Secretary for Farm Production and Conservation
Vicki Christiansen, Interim Chief, USDA Forest Service
Steve Guertin, Deputy Director, U.S. Fish and Wildlife Service
Jim Kurth, Deputy Director, U.S. Fish and Wildlife Service
Dan Smith, Deputy Director, National Park Service
Brian Steed, Deputy Director, Policy and Programs, Bureau of Land Management