



## Pollinator Competition on Public Lands Background, References and Key Messages

November 2020

### Summary

A July 2020 [petition](#) to the U.S. Forest Service by [Center for Biological Diversity, Xerces Society and others](#) has heightened debate regarding permitting of honey bee apiaries on public lands. The controversy and issues at stake are summarized in recent articles in the [Salt Lake Tribune](#) and [YaleEnvironment360](#). This briefing has been prepared for Honey Bee Health Coalition (Coalition) members and other interested parties to ensure awareness of the subject and to provide background on past Coalition conversations on this topic, information about member-led responses to the petition, considerations and key messages for potential discussion or talking points, and a sampling of relevant scientific resources.

### 2018 Coalition Conversations re: Pollinator Competition on Public Lands

In 2018, following the release of the [Xerces Society's An overview of the potential impacts of honey bees to native bees, plant communities, and ecosystems in wild landscapes: Recommendations for land managers](#) and the [American Honey Producers Association subsequent review](#), Coalition members explored the topic of pollinator competition on public lands. Over several meetings, Coalition members shared relevant literature, discussed stakeholder concerns, and invited a webinar presentation from authors of the [Mallinger et al \(2017\) lit review on the effects of managed bees on wild bees](#). As a result of that exploration, [twenty Coalition members wrote a letter](#) to U.S. Secretary of Agriculture Sonny Perdue and U.S. Secretary of the Interior Ryan Zinke.

### 2020 Coalition Member Responses

In response to the recent Xerces et. al. petition, the Honey Bee Health Coalition is organizing a sign-on letter for interested Coalition members and is also providing a forum to connect discussion and activities of various members. The Coalition is providing high-level information to interested parties through its newsletter and its website.

Several Coalition members are also preparing letters to US Department of Agriculture (USDA) and USDA Forest Service (USFS). Legal counsel for the American Honey Producers Association has filed with USFS a [letter of notice of intent](#) to file a full response to the petition, explaining why the Forest Service should reject its requests. There may be opportunity for additional organizations to sign-on or otherwise support once these responses are developed. Stakeholders also may choose to submit their own letters. As with any letter to a federal agency, detailed references and recommendations are encouraged where possible.

### Sample Talking Points

Organizations writing their own letters may choose to reference the high-level points made in the 2018 sign-on letter from various Coalition members and/or include additional points raised in recent discussion of the Coalition. Sample talking points drawn from these two sources could include the following.

1. Underscore:
  - a. vital importance of honey bees for U.S. agriculture

- b. importance of U.S. Forest Service lands for honey bees, and for the sustainability of commercial beekeeping and crop pollination
  - c. need for more acres of public and private forage and habitat for *all* managed and native pollinators
  - d. consistency of beekeeping with the U.S. Forest Service multiple use mandate, and the arguably smaller footprint of beekeeping as compared to other agricultural and energy development uses.
2. Request that public land managers and policy makers:
- a. 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;
  - b. 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;
  - c. 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;
  - d. support approaches that provide habitat for honey bees and all pollinators;
  - e. 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;
  - f. engage and consider diverse stakeholder input from various sectors and interests when considering policies and/or decisions impacting honey bees on public lands.

### **Submission Contacts**

Those wishing to write to the USFS and USDA can submit letters to the following:

Sonny Perdue, Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, D.C. 20250  
(202) 720-2791  
[AgSec@usda.gov](mailto:AgSec@usda.gov)

Vicki Christiansen, Chief  
U.S. Forest Service  
1400 Independence Ave., S.W.  
Washington, D.C. 20250  
(800) 832-1355  
[Victoria.christiansen@usda.gov](mailto:Victoria.christiansen@usda.gov)

### **Sample Scientific References**

For further learning on topics of managed and native pollinator interactions and land use, scientific references include (but are not limited to) the following.

- Do managed bees have negative effects on wild bees?: A systematic review of the literature ([Mallinger et. al. 2017](#))
- An empirical attack tolerance test alters the structure and species richness of plant–pollinator networks ([Biella et. al. 2020](#))
- RNA virus spillover from managed honeybees (*Apis mellifera*) to wild bumblebees (*Bombus* spp.) ([Alger et. al. 2019](#))
- Pitting Wild Bees Against Managed Honey Bees in Their Native Range, a Losing Strategy for the Conservation of Honey Bee Biodiversity ([Alaux et. al. 2019](#))

- Floral Resource Competition Between Honey Bees and Wild Bees: Is There Clear Evidence and Can We Guide Management and Conservation? ([Wojcik et. al. 2018](#))
- Wild, native bees and managed honey bees benefit from similar agricultural land uses ([Evans et. al. 2018](#))
- Questioning public perception, conservation policy, and recovery actions for honeybees in North America ([Colla and MacIvor 2016](#))
- Land use in the Northern Great Plains region of the U.S. influences the survival and productivity of honey bee colonies ([Smart et. al. 2016](#))
- Do managed bees drive parasite spread and emergence in wild bees? ([Graystock et. al. 2016](#))

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