



Partners for Sustainable Pollination

August 5, 2008—via E-mail

The Honorable Arlen Lancaster, Chief
Natural Resources Conservation Service
U.S. Department of Agriculture
Washington, DC 20250

The Honorable Teresa C. Lasseter, Administrator
Farm Service Agency
U.S. Department of Agriculture
Washington, DC 20250

RE: Honey Bee Habitat Needs in New Farm Bill Conservation Programs

Dear Chief Lancaster and Administrator Lasseter:

We are writing to substantiate the essential need for both the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS) and Farm Service Agency (FSA) to work together in ensuring that rulemaking and administrative decisions adopted with regard to the Conservation Reserve Program (CRP) and the Environmental Quality Incentives Program (EQIP) prioritize (1) providing forage for honey bees on CRP lands; and (2) cost-share assistance to help producers with the costs of purchasing appropriate seed and establishing honey bee forage.

Partners for Sustainable Pollination (PFSP) is collaboratively working with beekeepers, scientists and growers to improve the health of honey bees and also support native pollinators. Pollinator conservation provisions newly enacted in this year's Farm Bill are timely, as, our nation's honey bees are seriously threatened. Honey bees are succumbing in record numbers, jeopardizing the continued viability of our commercial pollination industry and predictable and affordable services to the U.S. agricultural community. Many key specialty crops are almost totally reliant on the services provided by beekeepers.

While there may be other opportunities in the Farm Bill conservation programs, PFSP recommends the following strategies regarding CRP management as critical “must haves” in contributing to addressing the health issues of honey bees in the U.S.—

- 1) Encourage and provide incentives such as CRP rental premiums to producers who include quality bee forage on their CRP acreage and make such acreage available to beekeepers.
- 2) Develop and provide information about appropriate seed mixes and best management practices necessary to provide quality bee forage on CRP lands, on a regional basis.
- 3) Provide cost-share assistance to producers wishing to establish or upgrade bee forage on CRP or other private lands.
- 4) Convene a “task force” with qualified individuals dedicated to the following recommendations, including but not limited to evaluating and monitoring for bee forage acreage sufficient to support the number of colonies needed to meet pollination services in the U.S.—
 - Identify CRP and other private lands currently utilized by beekeepers and develop recommended policies and incentives to ensure their sustainability as honey bee forage for the future.
 - Identify and encourage additional CRP lands that could be suitable or enhanced with proper seed blends, to provide bee forage to beekeepers.
 - Identify incentives for land owners who will manage their lands with intention to provide bee forage and pollinator habitat. (Creating a federal tax incentive is one possibility outside the Farm Bill).
 - Prioritize appropriate incentives for landowners who provide bee habitat to increase CRP enrollment in California, currently the lowest in the nation (\$22/acre).
 - Begin to overcome the disparity of insufficient "within" state colonies for needed specialty crops pollinations services.
 - Explore bee habitat possibilities in other Farm bill conservation and related programs.

Entomologists agree that bees require a mixing of pollens throughout the year to acquire the necessary proteins, lipids, vitamins, minerals and micronutrients required by bees to be at their healthiest, or another way to view it, their most resistant to pests and pathogens. Proper nutrition is also essential for the physiological development of bees to live their intended life span. The colony's survival is contingent on a sufficient adult population to retain viability coming out of winter. Currently there is no man made supplement that can be substituted and provide for the complete dietary needs of healthy bees. Studies conducted by ARS in 2006 confirmed that artificial feeds negatively impacted the longevity of adult honey bees. Leading researchers, including Judy Chen, Eric Mussen, and Jeff Pettis, indicate that a substandard diet is the greatest “stressor” to honey bees because subsequent causes of stress such as viruses, pests, or pesticides can be exacerbated when the robustness of the bee has already been compromised by insufficient nutrition.

Congressional hearings held in response to the current CCD crisis, both in 2007 and 2008 witnesses for the beekeeping industry referred to bee forage as a limiting factor for both the health of honey bees and the pollination industry. Zac Browning, President of the American Beekeeping Federation, has identified the critical role CRP land contributes to play in providing valuable forage, as highlighted in the attached exhibit. It is currently estimated that 40% of colonies managed by commercial beekeepers are utilizing available CRP lands for forage.

As demands to meet needs of a growing population continue, pressure on CRP lands for intensive development will surely follow. Beekeepers require access to safe sites to allow their bees to forage after their bees finish pollinating crops for the season. It is imperative that individuals and agencies in a position to take action, such as USDA and FSA, make it a priority to seek incentives which will encourage land owners to embrace providing honey bee and other pollinator beneficial practices. The newly enacted Farm Bill has leveraged consensus surrounding this critical issue by calling for conservation actions to benefit pollinators—both native and managed honey bees:

“Administrative Requirements for Conservation Programs

- (h) ENCOURAGEMENT OF POLLINATOR HABITAT DEVELOPMENT AND PROTECTION. – In carrying out any conservation program administered by the Secretary, the Secretary may, as appropriate, encourage (1) the development of habitat for native and managed pollinators; and (2) the use of conservation practices that benefit native and managed pollinators.

PFSP looks forward to indications from both USDA and FSA evidencing their commitment to supporting stewardship of applicable lands for the benefit of our honey bees and other pollinators. The health of honey bees can no longer be only a beekeeper problem. This is a problem requiring attention and actions by implementing agencies such as USDA, NRCS, and FSA to help protect this essential resource.

Respectfully Submitted,

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Attachment