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Partners for Sustainable Pollination

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Financial Assistance Programs Division
Natural Resources Conservation Service
U.S. Department of Agriculture
1400 Independence Avenue, SW-Room 5237-S
Washington, DC 20250-2890

RE: Comments on Wildlife Habitat Incentives Program (WHIP) Interim Final Rule, 7 CFR 636

Partners for Sustainable Pollination (PFSP) is pleased to submit the following comments to the U.S. Department of Agriculture (USDA), Natural Resources Conservation Service's (NRCS) request for public input on the interim final rule for the Wildlife Habitat Incentives Program (WHIP), 7 CFR 636.

PFSP is a 501(c)(3) nonprofit based in Santa Rosa, California. PFSP seeks to work collaboratively with beekeepers, scientists, growers, public agencies and other stakeholders to improve the health of honey bees with a concurrent objective of contributing to restoring native pollinator populations. More information about PFSP is available at http://pfspbees.org. In brief, PFSP recommends the following actions re WHIP:

1. **Clarify Practices Benefiting Honey Bees and Native Pollinators Eligible for WHIP.**
2. **Designate Honey Bees and Native Pollinators as National Priority for WHIP.**

PFSP offers additional recommendations to NRCS to NRCS beyond WHIP that also affect WHIP:

3. **Enhance Pollinator Conservation to Address Larger Scale Needs of Honey Bees.**
4. **Designate Coordinator to Advance Habitat Conservation for Honey Bees.**
5. **Establish Integrated Conservation Practice Standards and Tech Notes for Honey Bees and Native Pollinators.**

FARM BILL CONSERVATION FOR NATIVE AND MANAGED POLLINATORS

The 2008 farm bill has leveraged consensus surrounding the need to help pollinators by calling for conservation actions using the full range of USDA conservation programs 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 <u>managed</u> pollinators; and

"(2) the use of conservation practices that benefit native and <u>managed</u> pollinators.

[*emphasis added*]

Additional insight about Congressional intent is provided by the following excerpt from the Statement of Managers: "The Managers see **conservation programs as an important tool for creating, restoring, and enhancing pollinator habitat quantity and quality**. The Managers expect the Secretary to encourage, within appropriate conservation programs, measures to benefit pollinators and their habitat, such as using plant species mixes in conservation plantings to provide pollinator food and shelter; establishing field borders, hedgerows, and shelterbelts to provide habitat in proximity to crops; establishing corridors that can expand and connect important pollinator habitat patches; and encouraging related pollinator-friendly production practices."

This action by Congress reflects the importance of pollinators to agriculture and healthy wildlife ecosystems, the serious threats to ag pollination services, and the tremendous opportunities to use existing conservation programs to help honey bees, other managed pollinators and native pollinators.

PFSP urges NRCS to take full advantage of this authority to help farmers and ranchers develop habitat and use conservation practices for both honey bees and other managed pollinators and for native pollinators through WHIP, supporting Conservation Practice Standards and Tech Notes, and other conservation programs. WHIP can provide essential cost-share assistance to help growers purchase appropriate seed mixes for pollinators in wildlife habitat plantings that will benefit both native pollinators and honey bees.

HONEY BEES, BEEKEEPERS AND AG POLLINATION SERVICE AT RISK

It is well established that pollination of many specialty crops is almost totally reliant on the services provided by beekeepers and their managed honey bees. It is conservatively estimated that over $15 billion in crops are pollinated by managed honey bees in the U.S.

Our nation's honey bees are seriously threatened by a complex of pest and disease challenges, including Colony Collapse Disorder (CCD). There are increasing indications that native pollinators are also at risk. Honey bees are succumbing in record numbers, jeopardizing the continued viability of our commercial crop pollination industry and reliable and affordable pollination services to the U.S. agricultural community.

This threat goes beyond the bees to include the beekeepers that manage honey bees and deliver essential pollination services to specialty crops that are vitally dependent on honey bees for pollination. Unfortunately, the commercial beekeeping businesses that provide essential crop services are struggling to remain viable, with a significant contributing factor being lack of suitable forage for their bees between pollination contracts.

PFSP RECOMMENTATIONS

Clarify That Growers Installing Habitat Improvements Benefiting Pollinators Are Eligible for WHIP Cost-Share Assistance. Regulatory language and other explanations of WHIP eligibility criteria should be enhanced to make it clear that producers are eligible for cost-share assistance to help with costs of establishing pollinator-beneficial plants in habitat.

Designate Pollinator Habitat Needs as a National Priority for WHIP and Other NRCS Conservation Programs. PFSP urges NRCS to identify forage and habitat for ag pollinators—both native pollinators and honey bees—as a national priority for WHIP, and make a similar finding for other conservation programs. Honey bees and many native bees together represent a major agricultural input, in particular for many specialty crops. Both honey bees and native pollinators are arguably at risk.

State NRCS offices where ag pollination services are important should be encouraged to make similar determinations, especially in states or regions where ag pollination services are important and where forage deficits are recognized as a limiting factor for healthy honey bees and native ag pollinators.

Designate Honey Bee Coordinator to Enhance NRCS Pollinator Conservation Efforts. Even prior to the enactment of the 2008 farm bill, an emerging body of work at NRCS has been in evidence in the form of growing efforts to improve habitat for native pollinators. That effort is continuing to progress. Through work led by NRCS wildlife biologists at the national and state level, in close collaboration with native pollinator advocates like Xerces, Tech Notes are being developed or upgraded to include recommended plantings, habitat and other practices to benefit native pollinators. Technical assistance providers are being made aware of native pollinator habitat needs and practices, and grower workshops are being held or planned in many states. NRCS has even leveraged its resources by reportedly working out a cooperative agreement to support these outreach efforts in which several Xerces positions are now joint NRCS-Xerces positions. PFSP applauds these efforts. Since the nutritional needs of honey bees and native pollinators are similar in many respects, plantings for native pollinators will also benefit honey bees. These efforts are sure to result in improved forage that will benefit honey bees.

It is understandable that the natural focus of wildlife biologists and native pollinator advocates would be on native pollinators. However, good efforts to help native pollinators alone are insufficient to address the forage and nutritional needs of honey bees. As explained in other sections of these comments, the nutritional needs of honey bees are different in several important respects and thus require some additional and larger scale forage and conservation practices.

Therefore, PFSP urges NRCS to extend the good model used to help native pollinators to honey bees by tasking a designated coordinator and advocate to work within NRCS and with honey bee stakeholders to advance bee pasture and other conservation practices that best meet the needs of honey bees. Leveraged opportunities to include experts on honey bee forage needs should be sought.

Beekeepers and other advocates for honey bees are admittedly for the most part new to the NRCS process and culture, and how to constructively and effectively engage in that process. PFSP and other stakeholder representatives for beekeepers and honey bees are working to learn how best to provide input into policies and programs at the national level, help include honey bee needs in the development of critical resources like Conservation Practice Standards and Tech Notes, participate in State Technical Committees and county committees, and engage in other actions needed to help NRCS help honey bees as managed pollinators.

Include Larger Scale Practices Needed for Honey Bees in Conservation Practice Standards, Tech Notes and Outreach Efforts. The nutritional requirements of honey bee colonies are significant. It is estimated that it takes one full comb cell of mixed pollens and another full cell of honey to rear one honey bee worker. Since honey bee colonies rear 1,000 to 2,000 replacement bees daily, it is estimated that a colony requires 50 pounds of mixed pollens for bee rearing alone each year. Another way to describe that demand is to state that on every day during the active, brood rearing season (spring, summer, fall), each colony needs to collect pollens and nectar from an acre equivalent of mixed blooming plants. Much of that need may of course be met through neighboring habitat.

Forage plants are particularly important to honey bees because they provide all the food essential for colony growth and maintenance. Nectar is used to dilute honey and liquefy the pasty stored pollen before consumption, because honey bees must drink all their food through a very small hole at the tip of their mouthparts. Besides being dehydrated and stored as honey for future consumption, nectar supplies sugars necessary for the production of beeswax from glands in worker bees' abdomens. Beeswax is used to build the combs on which the bees live and in which they rear their brood and store their food.

Honey bee colonies are much more dependent on late summer and fall blooming plants as they must over winter thousands of individuals and not just a single queen. Enough honey stores must be accumulated for sufficient honey bees to survive through the winter to the next blooming season. Therefore, special consideration must be given to encouraging plantings of late summer and fall plants to meet this critical need.

Thus, larger scale landscape plantings are needed to meet the nutritional needs of managed honey bee colonies. For growers who wish to integrate larger scale beneficial practices that benefit honey bees, a potentially useful frame of reference is 'Bee Pasture' categories as defined by Dr. Keith Delaplane (University of Georgia): Single Year Productive, Multi-Year Productive, and Permanent Productive. By planning for sufficient resources for honey bees, it is more than likely sufficient resources will be available and enhanced for other pollinators given considerations for the carrying capacity of and planting choices implemented on the acreage involved.

While for the most part such larger scale practices may not fit WHIP, wildlife meadows can easily include planting mixes that will make them good bee pasture. Native bees benefit from such larger scale habitats.

Incorporate Practices Benefiting Honey Bees and Native Pollinators in Conservation Practice Standards. The 2008 farm bill specifically references "native and managed pollinators" in ensuring local needs are met when reviewing Conservation Practice Standards. These Standards constitute the core technical references that are used by NRCS as the basis for technical advice that is provided to ag producers and what practices are eligible for cost-share assistance and other incentives under WHIP and other programs.

PFSP urges NRCS to move forward on an expedited basis on updates and revisions to Conservation Practice Standards per the 2008 farm bill requirement to assure the "appropriateness and relevance of the standards to local habitat and conservation practices needs of native and managed pollinators."

Develop Comprehensive Tech Notes for Honey Bee Forage and Native Pollinator Habitat. PFSP urges NRCS to encourage each State NRCS office to draft a comprehensive, "one-stop" Tech Note for Pollinators, to give growers the range of information needed to enable them to make informed decisions about establishing forage and habitat other conservation practices to meet the needs of honey bees and native bees. In particular, growers need good information what to include in planting mixes that will provide good nutrition for honey bees.

PFSP supports the model of a single Tech Note in each State where ag pollinators are important that provides technical assistance providers and growers with a "one-stop" resource providing good information for both honey bees and native bees. PFSP is concerned that recent and ongoing efforts to produce Tech Notes for pollinators are focused almost exclusively on native pollinator habitat, with at best only passing reference to the conservation and forage needs of honey bees. It is important to provide commensurate information and recommendations that are tailored to meet the special needs of managed honey bees. PFSP believes that the option of two separate Tech Notes—one for native pollinators and a second for honey bees—is inefficient at best. Growers are busy, and the majority of habitat recommendations are helpful to all pollinators. It would seem much more effective to incorporate good information how to include larger scale forage practices that will benefit honey bees.

Similarly, grower workshops should present the full menu for both honey bees and native pollinators. PFSP is currently involved in such collaborative workshops in California.

The process could be expedited through development of a "model template" Tech Note for pollinators at the national level to expedite the process. Each State Conservation office could then work with stakeholders to tailor to the template to fit needs specific to that State.

Consider Enhanced WHIP Payment Terms and Bonus Eligibility Points for Habitat for Pollinators as Incentives to Growers. PFSP urges NRCS to offer innovative incentives to encourage growers to adopt practices that improve habitat development and protection for pollinators. This might be appropriate where honey bees and native pollinators are important providers of ag pollination services and/or are critical to addressing wildlife ecosystem challenges.

Encourage USDA Research on Natural Forage and Bee Pastures for Honey Bees. PFSP urges NRCS to collaborate with the USDA Agricultural Research Service (ARS) and the Cooperative State Research, Education, and Extension Service (CSREES) about additional research needed to improve the science about nutrition and forage needs and conservation practices that are best for improving honey bee health.

CONCLUSION

Ag pollination services are critical to the future of many specialty crops in a number of key ag states and across the U.S. PFSP believes these ag pollination services are clearly at risk if we do not take decisive action to protect and sustain honey bees, beekeepers and native bees. The health of honey bees can no longer be only a beekeeper problem. As humans, we want to use the bees to meet our needs, but do not take ownership for the responsibility for ensuring their well being and their right to thrive. We continue to neglect this vital part of agriculture at our own peril.

This is a problem requiring attention and actions by implementing agencies such as USDA, NRCS to help protect and sustain this essential resource. NRCS can take great strides in tending to the needs of ag pollinators by enhancing WHIP and other conservation programs and the supporting Conservation Practice Standards, by making pollinators a national priority and by providing cost-share assistance to growers who want to help honey bees and other ag pollinators.

PFSP looks forward to the active leadership of NRCS regarding efforts to upgrade WHIP, other conservation programs, the Conservation Practices Standards and other conservation programs and technical assistance, in particular to meet the forage and nutritional needs of honey bees by improving bee pasture and other pollinator habitat, and access to adequate forage for the nation's hardworking and caring beekeepers and their honey bees. Agricultural producers and natural ecosystems who need their pollination services, and ultimately consumers of the nutritious food produced, will benefit.

PFSP stands ready to work with NRCS by making growers more aware of conservation practices that can help honey bees and native bees and how they can apply for assistance and incentives available through WHIP and other conservation programs.

Respectfully Submitted,

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