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U.S. Department of Agriculture
Natural Resources Conservation Service
ATTN: Ms. Patty Lawrence
14th and Independence Avenue, SW, Room 4237-S
Washington, DC 20250

RE: **Comments on Soil and Water Resources Conservation Act—Habitat for Native and Managed Pollinators as a Priority Natural Resource Concern on Private Lands**

The Pollinator Partnership (P2) is pleased to respond to the Natural Resources Conservation Service (NRCS) request for comments (74 FR 25487, May 28, 2009) as part of the agency's development of an appraisal of the nation's natural resources and a national program/policy statement pursuant to the Soil and Water Resources Conservation Act of 1977.

In brief, P2's comments are directed to the critical importance of managed and native pollinators as a natural resource concern in agriculture and healthy ecosystems and to the need to fully implement the new conservation authorities for managed and native pollinators in the 2008 farm bill on an expedited basis to help farmers and ranchers improve habitat on private lands for managed and native pollinators.

P2 is a nonprofit organization headquartered in San Francisco, California. P2's mission is to catalyze stewardship of biodiversity. P2 places a high priority on efforts to protect and enhance animal pollinators (*invertebrates, birds and mammals*) and their habitats in both working and wild lands. P2 facilitates the North American Pollinator Protection Campaign (NAPPC), an ad hoc, tri-national collaboration involving scientists, stakeholders and agency officials working together on consensus-based efforts for the benefit of pollinators. More information about P2/NAPPC is available at http://www.pollinator.org/.

NRCS requests input in three areas—

NRCS Issue: *What is the most important natural resource concern on private lands today? In the next decade?*

P2 believes the wellbeing of native and managed pollinators is a critical natural resource concern that that has been long neglected. Insect and other animal pollinators play a pivotal part in the production of food that humans eat—with estimates as high as one out of every three bites—and in the reproduction of at least 80 percent of flowering plants. The commodities produced with the help of animal pollinators generate significant income for agricultural producers. For example, domestic honey bees pollinate an estimated $15 billion worth of crops in the U.S. each year, produced on more than 2 million acres. It is increasingly recognized that native bees also contribute significantly, providing "free" ag pollination services. Recent estimates credit native pollinators for providing about $3 billion annually in crop pollination services.

About 900,000 rented colonies are employed to pollinate 500,000 acres of just one major cash crop, almonds, grown in California—and that acreage is increasing. Producers of other specialty crops are increasingly concerned about the reliability and cost of pollination services. Availability and reliability of pollination services are the top priority to producers—simply stated, *no pollination, no crop*!

The cost for pollination services as a purchased agricultural input *actually increased at a higher rate than energy prices* over the past several years. The availability and reliability of these pollination services are no longer certain. It is thus in the economic interest of both agriculture and American consumers to help ensure a healthy, sustainable population of honey bees and native pollinators.

Today, possible declines in the health and population of pollinators in North America and globally pose what could be a significant threat to the integrity of biodiversity, to global food webs, and to human health. A number of pollinator species are at risk. Due to several reported factors, the number of commercially managed honey bee colonies in the U.S. has declined from 5.9 million in the 1940's to 4.3 million in 1985 and 2.5 million in 1998. All indications are the problem has worsened in recent years. Habitat loss was identified as a serious problem adversely affecting the nutrition and health of honey bees and other pollinators. Actions to provide improved habitat for pollinators were pointed to as vital to improving the health of honey bees and native pollinators.

Pollinator habitat conservation is essential to any comprehensive, sustainable solution. While the science needed to address CCD and other health challenges plaguing managed and native pollinators is still being developed, one area where the science is already clear is that habitat is an important component to the health of both honey bees and native pollinators, and that habitat losses have contributed to the declining health of pollinators.

USDA conservation programs can be highly effective in mitigating factors which can contribute to declines of native and managed pollinators, including: habitat fragmentation, loss, and degradation causing a reduction of food sources and sites for mating, nesting, roosting, and migration; improper use of pesticides and herbicides; aggressive competition from non-native species; disease, predators, and parasites; climate change; and lack of floral diversity.

Effective practices for protecting native and managed pollinators often overlap and complement other conservation practices, particularly those designed to improve wildlife habitat, and vice versa. In other instances, a practice designed to achieve wildlife or other conservation practices could generate significant benefits for native and managed pollinators by integrating modest enhancements such as selections of pollinator-beneficial plants. Similarly, conservation efforts for native and managed pollinators will advance other natural resource objectives—including the *new natural resource challenge of mitigating and managing the adverse impacts of climate change*.

NRCS Issue: *How effective are current conservation program approaches (e.g., technical assistance, cost-share, easements, compliance, research, land retirement, locally led conservation) in addressing this resource concern?*

Farm Bill Conservation Provisions for Native and Managed Pollinators: P2 applauds Congress for including pollinator-beneficial provisions for native and managed pollinators in the conservation, research and specialty crops titles of the Food, Energy and Conservation Act of 2008 (farm bill). The key provision that covers the full range of USDA conservation programs, including CRP, follows:

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.

In the Statement of Managers, Congress recognizes the value of pollinators and the ag pollination services they provide and provides additional direction to USDA in implementing the pollinator conservation provisions. In particular—

> "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."

The farm bill also requires a review Conservation Practice Standards for the completeness and relevance to local agricultural, forestry and resource needs including native and managed pollinators follows:

Review of Conservation Practice Standards
''(B) ensure, to the maximum extent practicable, the completeness and relevance of the standards to local agricultural, forestry, and natural resource needs, including specialty crops, native and managed pollinators, bioenergy crop production, forestry, and such other needs as are determined by the Secretary; and…"

P2 believes the Managers are clearly expecting USDA and implementing agencies to take full advantage of applicable authorities in conservation programs to encourage measures to help farmers, ranchers, foresters and others help pollinators and their conservation efforts. Pollinators, agriculture and healthy ecosystems deserve no less.

NRCS Issue: *What other program approaches (e.g., environmental service markets, tax credits) are needed to solve important natural resource concerns?*

In programs where tax credits, easements, and other economic incentives are used to preserve farmland, create wildlife habitat and other conservation objectives, value or credit could be given for habitat for native and managed pollinators. Consideration might also be given to being credit for allowing beekeepers to place their hives on the affected land.

For native pollinators, it may be possible to establish economic value for growers who establish pollinator habitat for the *ecosystem services* provided by native pollinators to other growers.

P2 POLLINATOR CONSERVATION RECOMMENDATIONS

P2 has made a number of recommendations to NRCS, including:

- Update Conservation Practice Standards to address the habitat needs of native and managed native pollinators.
- Designate habitat and best management practices (BMPs) for native and managed pollinators as a priority resource concern.
- Establish a national Technical Note for native and managed pollinators, including adequate recommendations on larger scale habitat forage needs of managed honey bees.
- Establish commensurate state-level Technical Notes for native and managed pollinators, with planting recommendations differentiated by ecoregion as appropriate.
- Revise relevant national Conservation Practice Standards to include practices that improve habitat for native and managed pollinators, including where appropriate practices that help address larger scale habitat forage needs of managed honey bees.
- Revise the affected conservation practice at the state level as expeditiously as possible to incorporate practices that improve habitat for native and managed pollinators.
- Collaborate with CSREES and ARS, to ensure that research and extension provide the outcomes needed to implement the most effective pollinator conservation and habitat practices possible, including on CRP lands.

One issue that P2 believes merits special attention involves *eligible plant lists for CRP lands*. Scientists and beekeepers alike increasingly recognize that pollinator habitat conservation is important to providing *natural sources of nutrition to managed honey bees*. More commercial beekeepers are reportedly now placing their hives on CRP lands between periods of commercial crop pollination as a source of forage and nutrition. CRP lands provide critical larger scale habitat opportunities needed for quality honey bee forage that is generally protected from pesticide use and drift. The wellbeing of managed honey bees is certainly critical to the future wellbeing agriculture. American Beekeeping Federation Zac Browning has stated that an estimated 40 percent of beekeepers in the U.S. have worked out arrangements with landowners to place their hives on CRP lands as reliable sites for high quality and safe forage value and carrying capacity.

There are reportedly several plant species, particularly clovers, that are being widely used on CRP and other conservation lands that provide optimal forage value and carrying capacity for honey bees, which are non-native and non-invasive. At least one state NRCS office (reportedly Minnesota) recently excluded all non-native species, including only native species, in updating plant lists for pollinators on conservation lands. This type of action should be reversed (except for locations where invasive species or sensitive ecosystems may create a conflict), at least until proven native plantings of equivalent forage value and carrying capacity can be identified through sound research and demonstrations.

POLLINATOR CONSERVATION VITALLY IMPORTANT

P2 is concerned that even as work proceeds to implement strengthened conservation provisions in the 2008 farm bill that *backward steps are occurring in our nation's quest to improve habitat for native and managed pollinators* and other wildlife. While CRP was being increased to 35 million acres over the last 15 years, a 2007 study indicated 25 million acres of grasslands habitat were plowed and put into production during the same period. Record commodity prices and additional bioenergy incentives are forces that will likely exacerbate the loss of grasslands habitat. It is widely anticipated that more CRP lands will be placed back into production as current contracts expire, and that additional grasslands will fall victim to the plow. The statutory cap has been lowered, and few expect any significant new CRP enrollments in an era of high commodity prices and bioenergy incentives.

These challenging dynamics make it even more imperative that NRCS make it a priority to help and encourage farmers and ranchers integrate pollinator habitat and pollinator-beneficial best management practices for native and managed pollinators into their conservation practices.

ECOREGIONAL PLANTING GUIDES FOR POLLINATORS

P2 has found that concerned citizens from all walks of life, including farmers and ranchers, are hungry for ways they can take action now to help pollinators. To empower stakeholders with the information needed to move forward with pollinator habitat conservation efforts on the ground, a new series of practical Ecoregional Guides, "**Selecting Plants for Pollinators**," is now available for 31 ecoregions in the U.S. These guides are intended to be practical tools as a starting point for farmers, ranchers, gardeners and public land managers who want to establish habitat for honey bees and native pollinators through native plants that are specific to their own region.

Each guide provides plant-pollinator information *specific to that ecoregion*, including (1) Bloom periods; (2) Native plants that attract pollinators; and (3) Habitat hints. Finally, each guide provides additional resources and tips, including (1) Habitat and nesting requirements different pollinators; (2) Basic checklist; and (3) Where to access additional information. The guides are available in downloadable form for free at http://www.pollinator.org along with information about how to use them. All users need is their zip code, and our online Zip Code Habitat Locator will connect them to their map and guide.

Ecoregions (ecological regions, or bioregions) denote areas of general similarity in ecosystems and in the type, quality, and quantity of environmental resources. The biodiversity of flora, fauna (including pollinators) and ecosystems that characterize an ecoregion tend to be distinct from that of other ecoregions. These general purpose regions are critical for structuring and implementing ecosystem management strategies across federal agencies, state agencies, and nongovernment organizations that are responsible for different types of resources within the same geographical areas.

P2 believes the Ecoregional Guides can serve as an excellent "technical assistance" resource to help increase awareness and as a starting point to help USDA work with farmers and ranchers include habitat for native and managed pollinators in their conservation efforts. P2 would be pleased to work with NRCS on appropriate ways to integrate awareness and use of this tool into the agency's programs and making technical assistance providers aware of this resource.

In closing, P2 urges NRCS as part of its review under the Resource Conservation Act to identify managed and native pollinators as a priority natural resource concern for conservation, agriculture and healthy ecosystems. P2 looks forward to working with NRCS and stakeholders representing farmers and ranchers to help realize the potential of the pollinator conservation provisions of the farm bill for native and managed pollinators, as well as the farmers and wildlife ecosystems that depend on their pollination services.

Respectfully Submitted,

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Executive Director