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October 19, 2009—By E-mail to CRPcomments@tecinc.com

CRP SEIS
c/o TEC Inc.
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Newport News, Virginia 23606

**RE: Conservation Reserve Program Supplemental Environmental Impact Statement—
Implementing 2008 Farm Bill Pollinator Conservation Provisions**

The Pollinator Partnership (P2) is pleased to respond to the U.S. Department of Agriculture (USDA), Farm Services Administration (FSA) request for comments on the supplemental Environmental Impact Statement (EIS) for the Conservation Reserve Program (CRP).

P2's comments are motivated by 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 as part of the CRP on an expedited basis.

P2 believes this important outcome can be achieved by "*pollinating*" *existing components* of the CRP and related programs—integrating the resource needs of native and managed pollinators into existing programs and conservation practices, both as part of FSA development and implementation of the CRP to help private landowners advance conservation for native and managed pollinators at the landscape level.

P2 Recommends: Expedited Action to Modify Existing Practices to Benefit Native and Managed Pollinators—Evaluate Need for New "Pollinator Conservation Practice" in Parallel

FSA presents two preliminary "Action Alternatives" in the Supplemental EIS. Under Action Alternative 1, a new "Pollinator Habitat Conservation Practice" would be developed, and existing practices would be modified to benefit pollinators. Under Action Alternative 2, existing practices would be modified to benefit pollinators, presumably without developing a new "Pollinator Conservation Practice." P2 urges FSA to:

1. *Move forward as expeditiously as practicable in modifying existing practices and then getting the enhanced practices implemented on CRP lands to improve habitat and forage for native and managed pollinators.* This is consistent with P2's recommendations provided in July 30, 2009 comments submitted to USDA on the CRP Interim Final Rule.
 - Scientists and beekeepers alike increasingly recognize that pollinator habitat conservation is important to providing *natural sources of nutrition to native and managed pollinators*. Increasing pollinator habitat and forage was a major recommendation of the National Academy of Sciences, NRC 2006 Report on the Status of Pollinators in North America.
 - CRP lands have provided significant habitat for a number of years, prior to enactment of the 2008 Farm Bill pollinator conservation provisions. FSA would be building on a track record of

positive actions and progress in encouraging habitat and forage plantings on CRP lands that have benefits native pollinators and managed honey bees and their beekeepers.

- More commercial beekeepers are recognizing the importance of natural forage for their bees and are increasingly 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 pasture-quality forage that are generally protected from pesticide use and drift.
 - 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 (little or no pesticide use) forage value and carrying capacity.
 - The wellbeing of managed honey bees is certainly critical to the future wellbeing agriculture.
2. P2 recommends that FSA *evaluate on a **parallel track** whether a new “Pollinator Conservation Practice” is required* to maximize habitat and forage benefits for native and managed pollinators on CRP lands under the 2008 Farm Bill pollinator conservation provisions. Enhancements to existing practices should not be delayed, but rather evaluated. If sound science and experience in the field support development of a new “Pollinator Conservation Practice,” then it should be developed.

P2 Recommends: Expedited Implementation of Modified Practices to Benefit Native and Managed Pollinators Should Not Be Delayed Pending Completion of Supplemental EIS

P2 understands that FSA is proposing to delay any pollinator-related improvements to the CRP until completion of the Supplemental EIS. Reportedly this would mean no pollinator enhancements to CRP until 2011 at the earliest. P2 strongly urges FSA to move forward with pollinator-beneficial improvements to the CRP without further delay, and not wait for completion of the supplemental EIS.

USDA, including FSA, already had the authority to integrate pollinator-beneficial enhancements in CRP and other existing conservation programs prior to the 2008 Farm Bill. Indeed significant enhancements for pollinators were added to a number of conservation programs, conservation practice guidelines and plantings lists prior to enactment of the 2008 Farm Bill. FSA previously worked with beekeepers regarding access to CRP lands, as well as planting mixes that provide high value nectar and pollen. The 2008 Farm Bill provisions served to strengthen and clarify the authority and signal an increased commitment to including pollinator-beneficial enhancements in the CRP.

The 2008 Farm Bill conservation provisions for native and managed pollinators are equally applicable to the full suite of USDA conservation programs. The Natural Resources Conservation Service (NRCS) has been moving ahead full bore with incorporating pollinator improvements into all the other conservation programs under its jurisdiction, not tied to any EIS process. P2 can see no justification for FSA delaying much needed enhancements concerning pollinators pending completion of a Supplemental EIS.

Both native and managed pollinators are in trouble due to multiple challenges. In particular, managed honey bees and their commercial beekeepers need pollinator-beneficial improvements on CRP lands. They can ill afford to wait around for two years.

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/>.

Farm Bill Conservation Programs for Native and Managed Pollinators

P2 applauds Congress for recognizing the critical importance of both native and managed pollinators by 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 (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 Congress is 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 native and managed pollinators as part of their conservation stewardship efforts. Pollinators, agriculture and healthy ecosystems deserve no less.

Native and Managed Pollinators Priority Resource Concern

P2 believes the wellbeing of native and managed pollinators is a critical 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.

Habitat Conservation Key to Wellbeing of Native and Managed 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.

CRP and other 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*.

P2 Recommends: Include Forage Needs of Honey Bees in Eligible Plant Lists

One issue that P2 believes merits special attention involves *eligible plant lists*. Scientists and beekeepers alike increasingly recognize that pollinator habitat conservation is important to providing *natural sources of nutrition to managed honey bees*. The wellbeing of managed honey bees is certainly critical to the future wellbeing agriculture. Private landowners' conservation practices can provide critical larger scale habitat opportunities needed for quality honey bee forage that is generally more protected from pesticide use and drift.

There are reportedly several plant species, particularly clovers, that are being widely used on conservation lands that provide optimal forage value and carrying capacity for honey bees, which are non-native and non-invasive. At least one State 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. For example, while the 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 conservation lands will be placed back into production as current contracts expire, and that additional grasslands will fall victim to the plow.

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

In closing, P2 looks forward to working with FSA and other stakeholders to help realize the potential of the CRP in advancing the pollinator conservation provisions of the 2008 Farm Bill for native and managed pollinators, as well as for the farmers and wildlife ecosystems that depend on their pollination services.

Respectfully Submitted,



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