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Comments: I am writing to request that those responsible for the revision of the Manti-La Sal National Forest Plan include in their Draft Environmental Impact Statement (EIS) the Conservation Alternative developed by competent and qualified members of the conservation community. It is important to include this alternative in the plan so that members of the general public, and qualified members of the scientific community, have the opportunity to offer their guidance and opinion on how their forest should be managed. In particular, whether the emphasis should be placed on taxpayer subsidization of use by private businesses or on conservation and management of our natural resources for all Americans.

My especial concern lies with the permitting of honeybee apiaries on Forest Service land. For some undiscoverable reason, honey bees have been granted a Categorical Exclusion since approximately 1981; there is no documented justification for this treatment which has been implemented, indefensibly and apparently unchallenged, for the past 40 years. Such a policy is unwise for several reasons all of which are set out in greater detail in the attached publication.

First, honey bee keepers should not be allowed to place their thousands of apiaries, containing millions of honey bees, on public lands because these MLS Forest Service lands are home to many hundreds of species of native bees; the distribution of many of these species is quite restricted and the population size of many of them is likely to be low. These native bee species are the most important pollinators of our native plants with which they have evolved. Native bees are predominantly solitary and are no match with the introduced honey bee which possesses an intricate social life and foraging system. North America had never seen the like of honey bees until they were introduced by early colonists; native species are ill-equipped to compete with them at collecting the pollen and nectar upon which they depend,. A recent scientific paper has shown that one typical honey bee hive removes enough pollen to raise 33,000 native bees/month. A typical apiary contains 48-96 hives and remains for three-to-four months on Forest Service land. This means that a single small apiary (48 hives) removes enough pollen to rear just under 5 million native bees in three months and a large apiary removes twice that number. Permits to the MLS have run to many thousands of apiaries and truly staggering numbers of alien honey bees. Such an influx of honey bees is simply intolerable to native bees.

Second, populations of native bee species are also threatened by the numerous diseases that honey bees carry and spread when they forage on flowers. Such diseases are unknown to native species which have not had opportunity to build up immunity to them.

Finally, while honey bees are effective pollinators of some plants, there are many other plant species which they visit and pollinate less effectively than do native bee species. Thus, when they overwhelm and exclude the native bee fauna from visiting native plants they also change, through ineffective pollination the seed production, seed rain, and seed bank of the native flora. The result will be, over time, a change in the flora of these native ecosystems with unpredictable results.

These and other concerns which could be mentioned (I am trying to keep this letter to a single page) strongly argue that the Conservation Alternative for pollinator management should be analyzed before the forest plan is finalized and implemented.

SEE ATTACHMET: Sego Lilly Newsletter of the Utah Native Plant Society