Data Submitted (UTC 11): 8/31/2021 5:09:16 PM First name: JERRY Last name: SHUE Organization:

Title:

Comments: As a retired beekeeper with 45 years of experience, including 12 years as a honey bee inspector in two states, eight years monitoring large scale varroa mite field trials, and nine years sampling feral honey bees for Africanized genetics, I do not think commercial migratory apiaries should be permitted on National Forest lands. Large scale commercial beekeeping is fraught with the same problems as other forms of industrialized agriculture, including pests and pathogens, pesticide accumulation and disease transmission. Allowing migratory operations to seek refuge from the stresses of modern ag buy placing hundreds of hives in National Forests just expands the impact of those stresses. Yes, there are abundant small widely dispersed feral honey bee colonies already in the National Forests that have established and acclimated themselves over the last several centuries, but any impact or competition they have on native pollinators would be nothing compared to the scale of migratory operations with bees from throughout the U.S.