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First name: Laura

Last name: Horn

Organization: Wild Bee Project

Title: Owner

Comments: Dear Manti-La Sal NF staff or consultant reading this,

I am a native bee expert working in Utah, alarmed by the lack of coherent direction in the forest plan regarding apiary permits and insect species of concern. You need to update your forest plan to include protections for native bees.

There are potentially devastating impacts to native bees on public lands when billions of honey bees are parked in their habitat during the flowering season. I know that you now possess extensive information on this topic, providing by scientists and natural resource professionals working in Utah. The only responsible course of action now is to include the Conservation Alternative in the DEIS which protects these resources adequately.

The Manti-La Sal is a diverse collection of lands, and houses importantly large communities of native bees, including species proposed for Listing. The new forest plan must list Western Bumblebee (*Bombus occidentalis*) as a species of concern, as it has been found recently (2019) in high elevations of La Sal Mountains. This bee has been nearly extirpated from Utah. The Manti-La Sal could contribute to its disappearance by pretending it doesn't exist here. The plan should also list all the native bees known on the Forest as it is important to catalog diversity.

Most importantly, the new forest plan must not permit honeybee apiaries on the Forest. This is an extremely harmful practice that outlandishly benefits the agriculture industrial complex, which should not be receiving free support from a federal land management agency. If you allow this practice to continue, you will be responsible for devastating the native bee populations that support the vast majority of flowering plants (about 90% pollinated by bees) on the Forest and you will threaten the current balance of the ecosystems in your care, which belong to the public. You have the information to know that native bees prop up a great number of key ecosystem services, including providing food for larger charismatic animals which the public are dearly attached to. Honeybees are NOT reliable pollinators of native plants and you can not rely on them to support your ecosystems if native bee populations collapse.

Please include the Conservation Alternative in your analysis.

Sincerely,

Laura Arneson Horn
Wild Bee Project LLC