



April 27, 2018

Leonard Jordan, Chief (Acting)
Natural Resources Conservation Service
US Department of Agriculture
1400 Independence Avenue SW
Room 5105A
Washington, DC 20250

Dear Chief Jordan:

Thank you for considering a honeybee and pollinator habitat enhancement for the Conservation Stewardship Program (CSP) entitled “Improved Crop Rotation to Provide Further Benefits to Pollinators” that would encourage the inclusion of canola or sunflowers in a farm’s crop rotation beginning in fiscal year 2019.

We write to encourage creating a similar conservation practice for the Environmental Quality Incentives Program (EQIP), and to provide input on the proposed criteria contained in the draft CSP enhancement.

Including a similar practice in EQIP would increase the likelihood of adoption of honeybee and pollinator friendly crop rotations on more farms because many producers have been unable to participate in CSP but do participate in the EQIP program. Further, many producers currently participating in the CSP program are enrolled in their second contract, which is the total number of contracts allowed for a producer under the program.

After reviewing the draft enhancement, we urge you to consider revising the proposed criteria stipulating that “no insecticides will be applied during crop bloom period of the pollinator friendly crop” to allow applications if the economic threshold of the identified insect pest has been reached.

We are concerned that very few producers, if any, will consider participating in the practice if the proposed insecticide application ban during bloom is not revised. Each cropping year is unique, and there are years when insecticides are not used. However, canola and sunflower plants during bloom are susceptible to severe damage from a number of insect pests when they are present in sufficient numbers. There are many pests that can affect canola and sunflower, and some of the most common include the bertha army worm, grasshoppers, diamondback moth, banded sunflower moth, sunflower moth, and red sunflower seed weevil. Infestations of these insects during bloom can be controlled successfully without major harm to pollinating bees by using Best Management Practices (BMP)s that include: (1) crop monitoring to ensure insecticides are only applied when the economic threshold justifies use; (2) communications between growers, applicators, and beekeepers early in the season, and again prior to application to choose insecticides that have the least toxicity to honey bees but are sufficiently toxic to control the

target insect pests, or to allow covering of hives, or hive movement if necessary; (3) timing the application to late in the evening or early in the morning when the bees are not active or present in the crop; and (4) observing climatic conditions such as wind direction to avoid drift towards the hives.

We also suggest that notification of state departments of agriculture be included in the criteria so that a registry detailing the location of honey bee friendly crops can be established to inform bee keepers of their existence.

Thank you in advance for considering these revisions. We look forward to working with you to ensure that these practices to enhance honey bee and pollinator habitat are implemented in a manner that will provide the greatest possible benefit to honey bees.

If there are questions regarding these recommendations, contact Dale Thorenson at 202-969-8900 or email dthorenson@gordley.com; or Eric Silva at 617-947-2633 or email eric@nsgovstrat.com.

Thank you in advance for your consideration of these recommendations.

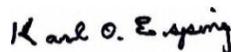
Respectfully yours,



Robert Rynning
President
U.S. Canola Association



Kelvin Ade
President
American Honey Producers Association



Karl Esping
President
National Sunflower Association



Tim May
President
American Beekeeping Federation

CC: Senator Heitkamp