



National Association of Conservation Districts

August 28, 2015

Jack Housenger
Director, Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460-0001

Docket Number 2015-18413

Re: Mitigation of Exposure to Bees from Acutely Toxic Pesticide Products

The National Association of Conservation Districts (NACD) represents America's 3,000 conservation districts that work with millions of cooperating landowners and operators to help them manage and protect land and water resources on private and public lands in the United States. NACD appreciates the opportunity to comment on the Environmental Protection Agency (EPA) proposed rule for protecting pollinators for the benefit of beekeepers, producers, and the public.

Conservation districts understand the importance of protecting both our managed and wild pollinators, as well as the many benefits provided to production agriculture by both pollinators and crop protection products. To that end, NACD encourages EPA to consider voluntary practices in which producers and/or beekeepers are involved. The benefits of voluntary measures should be considered before adding additional restrictions on pesticide labels. Some of these voluntary measures should include contract provisions that address the issue, voluntary communication, and best management practices. Many producers across the country are involved in voluntary, incentive-based programs through the Natural Resource Conservation Service (NRCS) that support wildlife habitat growth and management, including pollinator habitat and NACD continues to support these targeted programs.

NACD supports the development of Managed Pollinator Protection Plans (MP3s) by states and tribes to protect managed and wild pollinators on the local level. One nationwide solution will not solve the complex underlying issues. By enabling local decision making, states and tribes can create plans that best fit the needs and concerns of producers, beekeepers, and applicators in the state or tribe. States with independently-developed pollinator protection plans or state-level regulations have had recent successes, and NACD would like to see other states develop these as well. MP3s should be developed with input from as many local stakeholders as possible.

Conservation districts have been working with stakeholders on the local level for decades and have the capacity to continue doing so on this issue. Districts should be involved in the creation of MP3s. They have expertise and local connections that would be beneficial in both developing the plan and educating landowners, beekeepers, applicators, and the public about their state's MP3.

NACD appreciates the opportunity to provide input as you move forward to help protect pollinators for the benefit of beekeepers, producers, and the public. Please let us know if you have any questions about our comments or policies as you continue through the rulemaking process.

Sincerely,

A handwritten signature in cursive script that reads "Lee D. McDaniel". The signature is written in black ink on a light-colored background.

Lee D. McDaniel
NACD President