

The Honorable Tom Vilsack  
Secretary,  
United States Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250-1300

Ms. Cindy Smith  
Administrator,  
Animal and Plant Health Inspection Service  
4700 River Road  
Riverdale, MD 20737-1234

Ms. Rebecca Bech  
Deputy Administrator,  
Animal and Plant Health Inspection Service  
Plant Protection and Quarantine  
1400 Independence Ave., S.W., Room 302E  
Washington, DC 20250

Cc: Kevin Shea, Alan Green, Robyn Rose, Wayne Wehling, Colin Stewart

February 10, 2010

Dear Secretary Vilsack, Administrator Smith, and Deputy Administrator Bech:

The undersigned Native Plant Societies respectfully request that the USDA-APHIS take action to regulate the movement and health of commercial bumble bees in order to safeguard wild, native bumble bee pollinators.

Bumble bees and other native bees play a keystone role in the health and sustainability of native ecosystems, and are a critical resource for endangered plant species. It is estimated that 60 – 90% of the world’s flowering plants depend on animals—most of them insects—for pollination. The loss of native bee pollinators can result in a lack of seed or fruit set, fewer progeny, and potentially the extinction of a plant species. In Britain and the Netherlands, where multiple native bee species have gone extinct, researchers have observed parallel declines in plants reliant on those bee pollinators.

At least four species of formerly common North American bumble bees have experienced declines; two of those species – the rusty patched bumble bee (*Bombus affinis*) and Franklin’s bumble bee (*Bombus franklini*) are on the brink of extinction. A major threat to the survival of these wild bumble bee pollinators is the spread of disease from commercially produced bees that are transported throughout the country.<sup>1</sup>

In order to prevent the spread of disease to wild populations of bumble bee pollinators, the following Native Plant Societies respectfully request that APHIS use its regulatory

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<sup>1</sup> National Research Council of the National Academies, [Status of Pollinators in North America](#), (2007).

authority, outlined in a petition submitted on January 12, 2010 by The Xerces Society, Natural Resources Defense Council, Defenders of Wildlife, and Dr. Robbin Thorp, to regulate the interstate movement and health of commercial bumble bees. Specifically, the signatories of this letter request that APHIS create rules prohibiting the movement of bumble bees outside of their native ranges and regulate interstate movement of bumble bee pollinators within their native ranges by requiring permits that show that bumble bees are certified as disease-free prior to movement.

Thank you for your consideration of this matter.

Sincerely,

Greg Suba, Conservation Program Director  
**California Native Plant Society**

Thomas M. Antonio, Ph.D., President  
**Native Plant Society of New Mexico**

Janet Cobb, Executive Director  
**California Wildlife Foundation/  
California Oaks**

Judy Barnhart, President  
**Native Plant Society of Northeastern  
Ohio**

Jamie Ellis, President  
**Grand Prairie Friends**

Ron Loper, President  
**Native Plant Society of Texas**

Tom Hohman, President  
**Indiana Native Plant and Wildflower  
Society**

Peter S. White, Director  
**North Carolina Botanical Garden**

Brian T. Hazlett, President  
**Iowa Native Plant Society**

Chadwick Cox, Conservation Committee  
Chair  
**Oklahoma Native Plant Society**

Susan Rieff, Executive Director  
**Lady Bird Johnson Wildflower Center  
at The University of Texas at Austin**

Tony Frates, Conservation co-chair  
**Utah Native Plant Society**

Kirsten Johnson, President  
**Maryland Native Plant Society, Inc.**

Sally Anderson, President  
**Virginia Native Plant Society**

David Hanna, President  
**Montana Native Plant Society**

Michael Marsh and John Brown, Jr., Co-  
Chairs, Conservation Committee  
**Washington Native Plant Society**

Kathleen V. Salisbury, President  
**Native Plant Society of New Jersey**

Lynn Moore  
**Wyoming Native Plant Society**