February 24, 2020

Public Comments Processing
Docket Number FWS-R3-ES-2019-0100
U.S. Fish and Wildlife Service Headquarters
MS: JAO/1N
5275 Leesburg Pike
Falls Church, VA 22041-3803

Re: Comments on the Draft Recovery Plan for the Rusty Patched Bumble Bee

Friends of Blackwater (FOB) on behalf of itself and its 5,500 members and supporters, respectfully submits the following comments on the Draft Recovery Plan for the rusty patched bumblebee (RPBB). While FOB fully supports a recovery plan for the RPBB, this plan is currently inadequate and we urge the Fish and Wildlife Service to revise it in order to meet basic legal standard and properly facilitate recovery. The plan addresses threats to this species far too generally, and fails to meaningfully address one of the largest threats to the recovery of the RPBB: pesticides. It also fails to address the threat of large construction developments in RPBB habitat. Without specific actions to address these threats, this plan violates the language and conservation purposes of the Endangered Species Act (ESA).

Background

Historically, the bee was broadly distributed across the eastern and upper Midwest of the United States and was a prominent pollinator, ensuring that many ecologically significant species were properly pollinated. Prior to listing, the species experienced a widespread decline, with populations plummeting by about 87 percent in the past two decades. The species is likely to be present in only 0.1% of its historical range. Scenario modeling in the Special Status Assessment assumes that the main threats to this species will not decline significantly across the species range. To prevent this beautiful bumble bee’s extinction, and to recover the species such that it no longer requires the protections of the ESA, it needs a recovery plan that contains site specific actions on its top threats, especially pesticides, and destructive projects such as pipelines and highways.

The Draft Recovery Plan Fails to Contain Sufficient Site-Specific Management Actions

Overall, the management actions identified in the Draft Recovery Plan are too vague to meet the statutory requirement to provide “a description of such site-specific management actions as may be necessary to achieve the plan’s goal for the conservation
and survival of the species.” When drafting a recovery plan, the Service’s site-specific management actions must be as explicit. Far from explicit, the RPBB Draft Recovery Plan contains general “prioritized recovery actions,” stating that “Recovery Implementation Strategy describing the stepped-down activities to implement the recovery actions will be developed...” Regardless, even these prioritized recovery actions fail to adequately address the threats facing the RPBB.

**The Plan Fails to Provide Adequate Protection from Pesticides**

Independent science and observation have provided the Service ample evidence of the impact that pesticides and other stressors have on the RPBB. The evidence discusses one class of pesticides, neonicotinoids, at length, yet the draft recovery plan fails to even mention them. Neonicotinoids are heavily implicated in the decline of the RPBB because they are ultra-toxic to bees and butterflies, two essential pollinators, and are the most popular class of insecticides in the United States. Neonicotinoids are now used across over half of the cropland in the United States. These pesticides are highly toxic to bees and have been shown to have very serious sub-lethal effects at very low doses. Chronic exposure reduces bumble bee’s overall fitness, impairs reproduction, normal colony function, memory, eating and their ability to cope with other stressors. Neonicotinoids poison bees through direct contact with foliar spray through drift, in nectar and pollen of treated plants, and from the soil which is contaminated by spray and treated seeds. RPBB can also be exposed to neonicotinoids from dust spread during planting and in the soil from the hundreds of millions of acres of crops that are planted with neonicotinoid treated seeds. The recovery plan cannot profess to recover the species without addressing this leading threat. There is no mystery here about the devastating impacts of pesticides, and this plan will fail to recover RPBB unless it squarely addresses them. The Service must make a plan that incorporates and addresses pesticide impacts on both public and private land.

Right now the Draft Recovery Plan’s proposed management actions are wholly inadequate to address the grave threat of pesticides. Under proposed recovery actions, the Draft Recovery Plan outlines possible, general programs for minimizing the exposure to pesticides. These programs lack details regarding the scope of their implementation and the specifics of their execution. The basic parameters and goals for these programs should be outlined to ensure that they are producing effective outcomes for the RPBB. The failure to outline the necessary actions to protect RPBB from pesticides renders this recovery plan inadequate.

**Destructive Development Projects are Inadequately Covered in the Draft Recovery Plan**

The RPBB is also at risk from habitat destruction and degradation from pipelines, mines, and road construction; and the Draft Recovery Plan fails to provide site-specific management actions to address this threat. These activities are driving the decline of RPBB and will thwart recovery efforts, and their impacts must be addressed specifically in the Recovery Plan. The Draft Recovery Plan fails to address the direct threats of habitat fragmentation and degradation that would come from the completion of these and similar construction projects.

**The Draft Recovery Plan Fails to Propose Specific Monitoring Programs**

There are no specific plans or details regarding the necessary scope of monitoring required for recovery, and without a specific monitoring protocol the Service risks making decisions based
on poor quality data. Failing to acknowledge the scope of the problem and the challenges of measuring recovery for this species puts this recovery plan on a shaky foundation. Monitoring is an essential and non-trivial task that requires specific protocols to compare observations across a broad area. It is clear that a great deal of survey effort will be necessary for the RPBB because this species is becoming rarer over time. Survey effort will need to be conducted over a large number of sites and with substantial frequency to account for normal seasonal variations such as on-site forage availability and weather. It is clear that producing sufficient survey effort to determine the number of populations will require assistance from partner agencies. The Service has not determined an objective measurement protocol for this species, based on the best available science, if it allows individual districts to make up their own monitoring plans.

Conclusion

The Draft Recovery Plan for the rusty patched bumblebee fails to produce site-specific management actions. It also fails to outline monitoring efforts required to determine recovery. Friends of Blackwater urges the Fish and Wildlife Service to work to develop a recovery plan that addresses management actions that cover the threat of pesticides on public and private lands, and addresses habitat destruction, fragmentation, and pollution that result from large development and construction projects. The RPBB could be extinct in less than 30 years—there is no time to waste.

Sincerely,

[Signature]

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