Jan. 18, 2015

Mr. Robert F. Schultz, Jr.
FMCSA Driver and Carrier Operations Division
Office of Carrier, Driver and Vehicle Safety Standards
Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE.
West Building, Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: Hours of Service of Drivers; Exemption Applications: California Farm Bureau Federation
Federal Register Number: 2015-00101
ID: FMCSA-2014-0445-0001

Dear Mr. Schultz, Jr.

The Pollinator Stewardship Council is supportive of the petition to provide an exemption of the 30-minute rest break provision of the Agency's hours-of-service regulations for certain commercial motor vehicle (CMV) drivers transporting honey bees. The exemption would enable CMV drivers transporting honey bees to operate without taking a 30-minute break during the workday.

The Pollinator Stewardship Council’s mission is to defend managed and native pollinators vital to a sustainable and affordable food supply from the adverse impact of pesticides. The Pollinator Stewardship Council is a 501(c)(3) nonprofit organization; all donations are tax deductible, EIN 46-0811836
Honey bees are livestock which must be transported across the U.S. to pollinate one third of the fruits, nuts, vegetables, and seed crops. To ensure healthy honey bees arrive at the fields, care must be taken during their transport to regulate temperature. The transport must maintain a flow of cool, fresh air to the hives on board because excessive heat in the interior can jeopardize the health and welfare of the honey bees. Conversely, a transport of honey bees staying ahead of a storm forces carriers to transport their livestock in a timely manner to also maintain the viability of the livestock.

Carriers are deeply concerned for the safety of their livestock cargo, and the safety of other travelers on the road. This thirty minute exemption will not put the roadways at risk, and will help protect the livestock that pollinates our nutritious, delicious food supply.

Sincerely,

Michele Colopy
Program Director