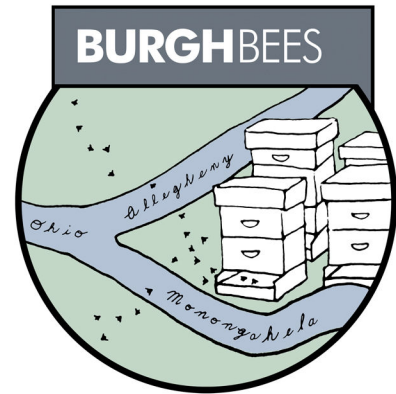


1025 Murray Hill Ave  
Pittsburgh, PA 15217

February 9, 2010

Planning Commission  
c/o Jason Kambitsis  
Department of City Planning  
City of Pittsburgh  
200 Ross Street, 4<sup>th</sup> Floor  
Pittsburgh, PA 15217



Dear Planning Commission:

Much of the public is aware that honey bees have suffered for the past three years from Colony Collapse Disorder, which has decimated between 1/3 and 1/2 of our total honeybee population worldwide. However, fewer people are aware of a perhaps equal threat facing honey bees—that is one of public perception. Honey bees are non-aggressive insects that sting only to defend their home. Once they leave their hive to forage, stinging is their defense of last resort. This behavior separates honey bees from more aggressive stinging insects, such as wasps, hornets, and yellow jackets, that are broadly labeled “bees” by the general public.

Our area continues to lose honey bees at an alarming rate. To compound this problem, we are losing beekeepers at an equally startling rate. The state’s beekeeping population is down to about half of its population of just two decades ago. Without beekeepers to raise healthy colonies, our city would be bereft of the flowers, vegetable gardens and budding trees that make it beautiful and enjoyable. It is impossible to support urban agriculture or even backyard gardening without supporting the honey bees that make it possible. Furthermore, urban beekeeping provides a unique opportunity to raise extremely healthy bees—the diversity of food sources and relative scarcity of pesticides compared to large scale agricultural areas, makes it an ideal environment for honey bees.

### **About Burgh Bees**

Burgh Bees has been supporting urban beekeeping in Pittsburgh for two years. We have grown rapidly into a 375-member strong non-profit, directed by seven seasoned local beekeepers. Since 2008 we have trained 80 new Pittsburgh beekeepers how to keep bees responsibly and we have established four demonstration apiaries throughout the city. Burgh Bees, in partnership with the Mayor’s office is currently developing a community apiary on Susquehanna Street in Homewood, on city-leased land, where we will continue to train urban beekeepers.

### **Request for Collaboration**

Burgh Bees supports the city’s efforts to develop guidelines that promote safe urban agriculture. We look forward to working with City Planning to develop effective legislation that fairly addresses the needs of city beekeepers, residents and pollinators. It is a very rare instance that a city has as organized and dedicated organization of urban beekeepers as Pittsburgh does. As the only organized beekeeping

organization in Allegheny County, Burgh Bees respectfully requests to be consulted with as the proposed ordinance is revised. We are confident that our first hand beekeeping experience in residential areas will be of considerable assistance in drafting an ordinance that promotes sound beekeeping in our green city.

### **Comments on the City's Proposed Urban Agriculture Ordinance**

We propose four basic revisions to the Ordinance as currently drafted. Each of these has precedence in our region or in peer cities and each is borne out of the desire to promote safe and responsible beekeeping in Pittsburgh. The requirements outlined in the current ordinance draft have the unintended consequence of promoting *unsound* beekeeping practices and banning beekeeping in neighborhoods where it has been effectively and safely practiced for years.

Our understanding of the ordinance and its implications continues to evolve as we receive input from our diverse membership. As of February 11, 2010 our concerns revolve around the rules outlined below:

#### **1. Setback Requirement:**

*Section 911.04.A.2(b) Agriculture (Limited), No. 9*

*Section 912.07.B Urban Agriculture (Accessory Use) With Animals, No. 9*

The current 15' setback requirement is unnecessarily burdensome to beekeepers and is disconnected from sound beekeeping practices. Beehives produce no objectionable noise or odor and are not permanent structures, therefore the setback requirement serves no valid purpose. The issue that should be of focus in the code should be the bees' flight path, not the hive placement.

Peer cities that have developed their beekeeping ordinance in concert with beekeepers have recognized this. Cities and towns including the County's own Shaler Township, Milwaukee and Seattle, have specified that hives within 15' of a property line be protected by a 6' high barrier or vegetated fencing to direct the bees' fly way upward and away from neighboring yards and to provide cosmetic screening. Additionally, these cities have also recognized the option of rooftop hives within 15' of property lines. Not only would such a revision better accommodate city beekeepers, but it would promote more successful beekeeping. The siting of a hive is important for bees to be healthy. Hives in full sun are healthier. Prescribing a 15' setback limits much of this siting capability and risks creating an urban stock of unhealthy bees. Just as you cannot grow healthy tomatoes in the shade, neither can you raise bees there.

To reiterate, many of our current city beekeepers, who have kept bees safely for years, cannot meet this 15' setback requirement. However, this rule can easily be amended with a Fly Way and Rooftop provision to make it an effective and functional rule.

#### **2. Square Footage Requirement:**

*Section 911.04.A.2(b) Agriculture (Limited), No. 6*

*Section 912.07.B Urban Agriculture (Accessory Use) With Animals, No. 18*

The rule requiring limited agricultural beekeepers to maintain 2,500 square feet for each hive is unnecessarily prohibitive. This effectively bans beekeeping in many of Pittsburgh's dense neighborhoods.

The rule outlined by the Mid-Atlantic Apiculture Research and Extension Consortium (MAAREC), which is the guidance Burgh Bees has shared with the Pittsburgh community is to keep no more than four hives on a property of 1/4 acre (10,000 sq ft) or less. The City's code should reflect the wisdom of this organization and of the multitudes of area beekeepers who hold to this rule.

The MAAREC rule recognizes that best beekeeping practice is not to maintain a single hive. For swarm management, monitoring the health of hives, and beekeeper education, beekeeping best practices include beginning beekeeping with 2 hives. Annual losses of beehives range between 25 and fifty percent. Keeping multiple hives at a location is necessary to simply ensure the entire apiary population does not die out. Each beehive does not require an additional 2,500 square feet of land to be a safe, healthy hive.

### **3. Special Exception Fees:**

*Section 911.04.A.2(b) Agriculture (Limited)*

*Section 912.07 Urban Agriculture (Accessory Use)*

The fees associated with applying for a Special Exception as it pertains to Agriculture (Accessory Use) are prohibitive for backyard beekeepers. Currently, the applicable fees range from \$315-\$340 including occupancy permits, according to City documents. The Agriculture (Accessory Use) category was created to enable individuals to benefit from profits earned by selling their own produce and other products. For an average household, a \$315 fee would negate profits that could be made from the sale of honey or hive products from only a few hives. Furthermore, there is a necessary marketplace within the beekeeping community to sell hives, splits, and bees as part of basic hive maintenance. To discourage this kind of small-scale commerce would again be to discourage sound and widely instituted beekeeping practice.

### **4. Lack of Training Requirement:**

To further our shared goal of promoting good-neighbor beekeeping, the City should require individuals to take a beekeeping course. Classes are offered both online, as well as locally through a variety of vendors and non-profits. This would do much more for the practice of sound urban apiculture than simply requiring beekeepers to abide by standard zoning setback rules. Area beekeepers would embrace a training requirement because it would protect the integrity of the profession. This would be a measure of regulation which could serve as a sign post to other cities considering similar ordinances.

### **5. Consideration of Community Apiaries:**

Burgh Bees is currently developing a community apiary in conjunction with the Mayor's office. Apiaries such as these deserve special attention and should be allowed to host a higher density of beehives than residential parcels. We look forward to exploring appropriate provisions with the Planning Commission and City Planning.

## **Proposed Revisions to the Ordinance**

1. Remove the 15' setback requirement and instead promote proper siting of hives by adding the following provisions:

- a. If a hive is placed within 15' of property line, a 6' barrier or vegetated fence, is erected to direct bees flight upward OR
  - b. If a hive is placed within 15' of a property line, it must be raised 6' high, such as on a roof.
2. Remove the 2,500 square feet per hive requirement and replace with the following provision:
  - a. If lot is 10,000 sq ft or less, maintain no more than 4 hives.
3. Remove the fee for an Administrators Exception which currently ranges from \$315-\$340.
4. Require beekeepers to provide a certificate of training or demonstrate 1 year of prior experience.
5. Explore higher density hive exceptions for community apiaries.

Pittsburgh beekeepers are confident that the Planning Commission will demonstrate the progressiveness of our city. The current ordinance as it pertains to beekeeping is misguided and makes evident the haste of its drafting. We firmly believe that Pittsburgh is capable of adopting urban beekeeping codes similar to those other cities have enacted and implemented with success for years. Burgh Bees looks forward to working with the Planning Commission to lead our green city toward a sustainable future.

Sincerely,

Meredith Meyer Grelli  
Co-Founding Director  
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