To: U.S. Fish and Wildlife Service
MS: PRB/3W, 5275 Leesburg Pike
Falls Church, VA 22041-3803.

January 23, 2025

Attn: FWS-R3-ES-2024-0137

The Xerces Society for Invertebrate Conservation, on behalf of the undersigned organizations and individuals, is pleased to submit this letter into the public record in support of U.S. Fish and Wildlife's proposal to list the monarch butterfly as threatened under the Endangered Species Act (Docket No. FWS-R3-ES-2024-0137).

We commend the Service for taking this important step to protect and recover the monarch butterfly under the Endangered Species Act. We fully agree that this iconic, culturally significant, and biologically unique species needs and qualifies for this level of protection. Since monitoring began in the 1980s and 1990s, monarch butterflies have declined by approximately 80% in their eastern population and more than 95% in their western population. Monitoring by the Xerces Society's Western Monarch Count found that 2024 was the second lowest population year ever for overwintering western monarchs.

We strongly support the Service's critical habitat designation for western monarch overwintering sites along California's coast. The selection criteria used by the Service focus on the quarter of overwintering sites which typically host the majority of the population. Monarchs are especially vulnerable during this overwintering period because so many individuals are concentrated in a relatively small area. Overwintering survival is estimated to be less than 50%, which makes the individuals who survive until spring vital to restart the breeding season.

We urge the Service to expand critical habitat designations to include key geographic areas that are significant to the successful migration of the eastern monarch populations. For example, there are well-documented roosting and stop-over sites, including sites in Cape May, NJ, and corridors in Texas used by nearly all eastern monarchs for a few short weeks in the spring and fall.

While we generally support the Service's proposed exemption which would allow the public to continue to handle, tag, and participate in small-scale rearing of monarchs for educational and research purposes, the upper limit of 250 butterflies is too high. Monarchs are popular educational species and community science has contributed to understanding the species' biology and conservation needs. **However, we suggest that the maximum number of monarchs that an individual can rear and release should be 25, not 250, and we oppose the proposed exemption which would allow the sale of monarchs.** There is no

conservation reason for selling a listed species and this provision risks setting a harmful precedent for other threatened and endangered species.

We support the Service's proposed exemptions to allow the continued participation in conservation programs and to allow routine agricultural and ranching activities such as tilling and grazing. These common-sense exemptions will allow restoration efforts and working lands to continue to be part of the solution by providing essential habitat that monarchs rely on for food and reproduction.

While the Service states that pesticides are a threat to monarch recovery, **the proposed rule does not adequately address this threat.** We ask the Service to ensure that the final rule includes strong pesticide protections for monarchs, and we caution against full reliance on the Environmental Protection Agency (EPA) to enact necessary safeguards.

The Service must act where EPA's risk assessment frameworks fall short. For example, EPA's approaches for mitigating pesticide harms to endangered species do not address…

- … most non-agricultural uses, including turf and other applications around homes. Many overwintering sites are in urban areas, which means that monarchs remain vulnerable to pesticide exposure from applications around homes and other buildings. This concern is underscored by the deaths of roughly 200 overwintering monarchs in Pacific Grove, CA last year from pesticide poisoning, likely caused by nearby residential or commercial pesticide application.
- … numerous ways pesticides can contaminate milkweed, which may lead to chronic exposure of monarch caterpillars to systemic insecticides like neonicotinoids and diamides.

As the expert agency, the Service should identify monarch-specific pesticide risks and address these with the EPA to ensure comprehensive protections for the species.

We are grateful to the Service for the time, thought, and energy put into this proposed listing and we look forward to seeing a strong final rule for the monarch butterfly.

Signed,

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Emily May, *Agricultural Conservation Lead*

Xerces Society for Invertebrate Conservation