

The Honorable Sally Jewell, Secretary of the Interior
The Honorable Daniel Ashe, Director, U.S. Fish and Wildlife Service
Mr. Douglas Krofta, Chief, Branch of Listing, Endangered Species Program, U.S. Fish and Wildlife Service

November 13, 2014

Dear Madam Secretary of the Interior, Mr. Ashe, and Mr. Krofta,

We write to you to express our support to protect the monarch butterfly as a Threatened species under the Endangered Species Act (ESA).

The monarch butterfly population has declined dramatically, by an alarming, statistically significant 90% over 20 years of monitoring. While many factors threaten the monarch's habitat, it is the loss of milkweed from the key areas where monarchs breed in the American Midwest—primarily driven by extensive use of the herbicide glyphosate on genetically engineered glyphosate-resistant crops—that is thought to be the most significant contributor to the monarch's population decline. Other contributing factors may include climate change, severe weather events, logging in the overwintering habitat, wide spread use of systemic insecticides, disease, and predation.

We request that the U.S. Fish and Wildlife Service (Service) take a leading role in protection and recovery efforts by granting the monarch butterfly protection as a threatened species under the ESA. ESA protection will allow the Service to establish a monarch recovery plan and promote the large scale conservation efforts needed to restore monarch populations.

Once protection is granted, we ask that the Service recognize the important role that research by scientists and citizen scientists has played, and will continue to play, in understanding and conserving the monarch butterfly and its habitat. To this end, we request that the Service streamline the permitting process, so that scientific and conservation research and citizen science activities are encouraged rather than deterred by a listing. In addition, we support the special 4(d) rule that the petitioners requested (on p. 159 of the petition) to exempt certain activities from the 'take prohibition' in order to facilitate monarch butterfly research, citizen monitoring, education, and conservation.

Sincerely,

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