

To Whom It May Concern,

The undersigned organizations write in strong support of the U.S. Fish and Wildlife Service's (FWS) proposal to list the monarch butterfly (*Danaus plexippus*) as a threatened species under the Endangered Species Act (ESA) and to designate critical habitat necessary for its survival. This action is a critical first step to protecting one of North America's most iconic and vital pollinators.

Monarch populations have experienced devastating declines over the past few decades. The Western monarch population has dropped by 99% since the 1980s, with recent winter counts reporting historically low counts of just over 9,000 butterflies. Formerly active overwintering sites are now largely empty, a stark indicator of ecosystem distress.

This decline is not just a monarch crisis. It is a warning of wider environmental problems that are impacting our ecosystems. Habitat loss, global warming, and pesticide exposure, especially systemic insecticides such as neonicotinoids, are all contributing factors driving monarchs to potential extinction. Addressing pesticide exposure as one of the primary threats to monarchs is critical for this species to recover. These chemicals are taken up by plants and end up in the nectar and pollen that monarchs rely on, exposing them to harm throughout their entire life cycle. Even small amounts can lower their chances of survival, affect their ability to reproduce, slow their growth, and disrupt their long migrations. These pesticides do not remain confined to their application sites. They can spread through soil and water, contaminating wildflowers in areas such as city parks, backyard gardens, and nature reserves, spaces that should serve as safe havens for pollinators.

We urge FWS, in collaboration with the Environmental Protection Agency (EPA), to address monarch-specific pesticide risks to ensure full protections for the species. Strengthening pesticide protections should be a key part of the listing decision and any future recovery efforts. Additionally, we encourage FWS to expand the critical habitat designation, making sure monarchs have safe, connected spaces for breeding and migration throughout their range. With stronger habitat protections and better pesticide regulations, we can help bring monarch populations back and restore the health of the ecosystems we all depend on.

We strongly support the proposed listing of the monarch butterfly as a threatened species under the ESA and the designation of critical habitat. We urge FWS to go further by addressing pesticide threats and expanding habitat protections to give monarchs the best chance of recovery.

Sincerely,

Turtle Island Restoration Network/SPAWN

Resource Renewal Institute

Northern Virginia Bird Alliance

Save Our Sky Blue Waters

Endangered Species Coalition

Environmental Action Committee of West Marin

Kettle Range Conservation Group

New Hampshire Audubon

Carnivore Coexistence Lab

Large Carnivore Fund

Marin Monarch Working Group

Society for the Protection of Insects

Prairie Hills Audubon Society [of Western SD]

Species Unite

FOUR PAWS USA

Environmental Protection Information Center- EPIC

NY4WHALES

The Urban Wildlands Group

Los Angeles Audubon Society

American Bird Conservancy