

I request that the Monarch butterfly **not** be listed under the Endangered Species Act.

I am Edith Smith and I am the primary owner of Shady Oak Butterfly Farm, Inc, in Brooker, Florida. We raise 30 species of butterflies and moths each year in 6 labs at our farm. We grow host plants in six greenhouses. We ship to universities, research facilities, schools, families, and more. I teach the Disease Prevention in Lepidoptera Course for the Association for Butterflies.

There are several reasons why Monarch butterflies (*Danaus plexippus*) should not be listed and there are zero reasons why it should be listed.

- The Monarch species is not endangered or threatened. They are found in 49 of the 50 US states as well as in several countries in the world.
- The migration urge is genetic. As long as there are Monarch butterflies in the US, migration will continue.
- Although the recorded numbers overwintering in Mexico have decreased by 90%, this past winter they increased by 69%. If they increase at the same rate until 2018, the numbers will be less than half a hectare below the average of 6 hectares claimed by the Xerces Society. By focusing on ensuring that milkweed and nectar plants will be abundant in their northern migration route and nectar abundant in their southern migration route, there is a high possibility that this would happen.

Why NOT to list:

- As long as the possibility of a listing looms, some farmers and landowners will kill milkweed on their property to avoid possible future problems with FWS.
- The funding that is going toward consideration of listing (and possibly listing) a species of butterfly that is abundant could be used to protect species of animals that are truly endangered.
- Listing will not address the primary cause of decrease of numbers of the Monarch population. The decrease is greatly due to several reasons. 1. Listing will not address prolonged droughts in northern Mexico, Texas, and surrounding areas that has killed milkweed plants and prevented generous nectar production by nectar plants. 2. Listing will not encourage farmers and gardeners to plant more milkweed. It will do the opposite. 3. Listing will not encourage a decrease of use of pesticides. 4. Listing will not replace forests that were illegally logged from overwintering sites in Mexico. 5. People tend to focus upon things with which they can interact. Listing will decrease/stop people's interaction with Monarch butterflies and their focus will turn to other interests.

What can be done to increase Monarch population instead of listing Monarch butterflies as endangered:

Milkweed:

- Farmers should be encouraged to plant milkweed in the primary migration route. The government could provide an allotment for farmers in the primary migration area to grow milkweed and nectar plants in the spring as Monarch butterflies migrate through their states.
- Our government could require that all cities allow milkweed to be planted in city limits. In some cities, growing milkweed is illegal.

Drought:

- Drought in north Mexico, Texas, and the surrounding area has caused much of the decrease in Monarch numbers. During droughts, water restrictions could be eased specifically for use on milkweed plots during their northward spring migration.

Petition's purpose:

It is my opinion that the purpose of the petition is to make butterfly farming illegal. The Xerces Society and NABA have tried to stop butterfly releases for years, using outright falsehoods in their attempts to do so. In this latest attempt, they asked for an exemption of 10 to be raised and released by each family. Enthusiasts have seen through this and have stood against the petition. Those who wrote the petition have now requested that the number be increased to 100 per family.

This letter was emailed today to the Monarch Watch mailing list: >>>In response to many interested and concerned folks, the petitioners have suggested revision of the limitation on numbers of monarchs that individuals can rear and release. Here is the revised wording: "The petitioners originally suggested that individuals, households, and educational entities be allowed to collect ten wild caterpillars per year for rearing purposes, but they increased the suggested number to 100 in comments submitted to the Service during the public comment period on the initial positive finding on the petition. Ultimately, should the Service list the monarch as threatened and develop a 4(d) rule, the content of this rule would be at the discretion of the Service."<<< This clearly means that they are willing to bend to the will of the enthusiasts in order to have the petition gain more support to encourage the FWS to 'protect' Monarch butterflies under the Endangered Species Act. Most enthusiasts do not realize that the petition is not the actual law that would pass and that the FWS is not bound by suggestions presented in the petition. They assume that whatever the petition suggests that they are allowed to raise, the FWS will allow them to raise. I find it very suspect that they suddenly decided to 'allow' enthusiasts to raise ten times the number they originally suggested. That is a huge difference in number.

Considering that butterfly breeders have disease prevention measures in place and few enthusiasts have any idea of the need to disinfect rearing containers or how to prevent disease transfer, any disease issues would clearly come from enthusiasts instead of from breeders. Yes, breeders ship from one side of the US to another. So do enthusiasts. It is well known among enthusiasts that they take their butterflies (larvae/pupae) with them as they travel or mail them to family throughout the year.

In addition, the petition fails to address the primary transfer of OE spores and disease pathogens from one state to another: milkweed plants. Nurseries ship millions of plants across state lines. Although many of these plants have been treated with pesticides, many have OE spores as well as Monarch eggs and larvae that will live on in their new state. It is my opinion that more butterflies, disease, and OE spores are transported across the US by nurseries on plants than by all other methods put together.

Butterfly farms:

1. Those who wrote the petition state that butterfly farmers 1) have limited genes in their Monarch stock yet complain that 2) they take stock from the wild for new genes. They contradict themselves in their own petition. This proves that the problem is neither that we have limited genetics or that we take stock from the wild. The problem is that they will not be happy with anything we do. We cannot please them because we 1) have limited genes or 2) we add new genes. Both of these points are used in their petition as negative marks against butterfly farmers. (This raises questions about the validity of the rest of their petition.)
2. Butterfly breeders/farmers guard against diseases that nature uses to keep a species alive. Nature must kill approximately 98% of all butterflies (egg, larva, pupa) before they become adults. Otherwise most species would become extinct within one year.
<http://www.butterflyfunfacts.com/butterfly-enemies.php> Butterfly farmers cannot allow nature to behave in the same manner in their farming operations. If farmers did not set up safeguards and farm with safeguards in place, farms could not operate for long.
3. The Association for Butterflies has offered a disease prevention course for years. I've taught this course for the AFB one or more times a year, beginning in 2007.
<http://butterflycollege.org/live-butterfly-courses/>
4. If butterfly releases caused any of the problems that the opposition proposes, they would give instances that it has happened. Butterflies have been released at special events for twenty years. Those that oppose butterfly releases, such as the Xerces Society and NABA, have never offered even one documented case of a release having a negative effect on a wild population of butterflies. If there was even one case of a proven negative impact, they would use it to prove their point.
5. The AFB and Mississippi State University have a disease screening program in place. Some farmers send larvae to Mississippi State on a regular basis to stay ahead of potential problems.
6. Butterfly breeders are regulated by the USDA. We must have permits to legally ship or transport butterflies across state lines.

Shady Oak Butterfly Farm:

- Has taught several butterfly farming seminars and conducted week-long butterfly farming internships to men and women from 13 different countries - some of these interns were referred to us by doctors at the McGuire Center of Lepidoptera Diversity and the University of Florida
- Grows milkweed in closed greenhouses to prevent wild butterflies from coming in contact with our plants which prevents any chance of disease pathogens or OE spores from coming into contact with our plants
- Checks all Monarch and Queen butterflies for OE before they are allowed to breed
- Adds new stock (from the wild) to our breeding stock every year for genetic diversity
- Conducts free presentations in several counties for schools, gardening clubs, churches, Hospice units, and more
- Ships larvae to hundreds of schools
- Holds USDA permits for 47 states plus Washington DC
- Ships pupae to 36 exhibits throughout the US

- Has given away thousands of packets of native and non-native milkweed seed as well as thousands of packets of other native and non-native host and nectar plant seed
- Has provided stock to several universities for graduate students' projects
- Has donated thousands of butterflies and educational hours for Hospice events
- Has provided stock to several universities and research facilities for research
- Has provided stock for entertainment and educational movies
- Has two educational-only websites www.butterflyfunfacts.com and www.butterfly-fun-facts.com
- Has an educational facebook page with 5,900 followers www.facebook.com/shadyoakbutterflyfarm
- Has provided income to over 20 different families
- Donated host and nectar plants to over a dozen different community gardens

In conclusion:

The petition to 'protect' Monarch butterflies under the Endangered Species Act will do harm to the Monarch population, prevent students from the opportunity to study Monarch butterflies, and potentially further decrease the number of Monarchs in nature.

If Monarch butterflies do become protected by FWS, I request an exemption and permission to continue to raise Monarch butterflies for education, exhibits, and other purposes.

Thank you,

Edith Smith

Shady Oak Butterfly Farm, Inc.