

To Whom It May Concern:

I am opposed to the listing of the Monarch as threatened under the Endangered Species Act even though, like many others, I applaud unified efforts by Monarch Watch, Southwest Monarch Study, Monarch Butterfly Fund, Monarch Alert, and other similar organizations dedicated to pooling resources in order to restore monarch important habitat and milkweeds for this butterfly.

I have been involved in the study of butterflies for 29 years, am currently serving as one of three Vice Presidents of the Lepidopterists' Society as well as on the board of directors of the International Butterfly Breeders Association. I also provide educational programs for kids on Utah butterflies including the rearing and releasing of monarchs and other butterflies. I love to study and teach others about butterflies and have discovered and described one new subspecies of butterfly myself. (*Anthocharis julia prestonorum* in Colorado.)

That being said, the petition provided by the Xerces' Society, Center For Biological Diversity, and The Center for Food Safety to transition ownership and enforcement of monarch conservation efforts to the U.S. Fish and Wildlife Service who will impose regulations on citizen scientists, butterfly farmers, and landowners is of enormously grave concern because of its overreach while side stepping addressing root causes.

Let's talk about root causes.

There is no question that concerns over the 90 percent decrease in monarch numbers is mostly the result of GMO Roundup Ready crops that destroy *Asclepias syriaca*, the monarch's principal host plant in the corn belt of the U.S. There is no question that Monsanto is culpable for the primary cause for monarch's decline through the use of glyphosates in the corn belt. Lincoln Brower's concerns regarding the destruction of monarch overwintering sites in Michoacán, Mexico, due to local illegal logging also are well documented and are very real in worsening the decline of *Danaus plexippus plexippus* in North America.

In my opinion, these two major problems combined with global warming, inclement weather, etc. are NOT in question. The problem IS the misuse of the Endangered Species Act and its application to an iconic butterfly, while leveraging the sympathies of some of the uninformed public who are naively supporting this proposed listing where other more needy organisms are being pushed aside because of the popularity of the monarch.

THAT is the problem.

This proposed listing isn't about monarch conservation anymore. This is more about the misuse of the spirit and intent of the Endangered Species Act.

Chip Taylor, of Monarch Watch, says the following regarding USFWS regulation of the monarch. "*The fear of regulation, or the possibility of the government telling landowners what they can and can't do with their land, rallies the opposition. This polarization can become political. There are a number of ongoing battles along these lines. Monarch conservation needs*

to remain apolitical and will be best served if we engage landowners rather than drive them away."

In his article, "Why the Monarch Butterfly Should not be listed under the Endangered Species Act", molecular biologist, Dr. Nick Grishin, writes, *"I call the petition "scientifically dishonest" because in order to fit the mold of the ESA (which is not possible), petitioners had to tweak the language at least slightly to make it fit. As a scientist, I object to this approach. In my view, the ends do not justify the means. But, to make the case sound convincing, the petitioners "overreach", i.e, they bend the truth here and there in the document. This should not be done. If the ESA does not apply (and it clearly does not in the case), scientific integrity should not be compromised to suggest otherwise."*

Professor Daniel Rubinoff, who specializes in insect conservation at the University of Hawaii stated, *"So why not list the species? To begin, the overwintering population in Mexico still totals more than 30 million. Most insect conservationists would be thrilled to record numbers even a tenth of that for many rare species around the country. And that total doesn't include the millions of monarchs in populations wintering in California, or those that live year-round in Central America and the Caribbean, or the introduced populations thriving across the Pacific islands and in Australia."*

Unfortunately, species conservation can be very much a zero-sum game. Pouring additional resources into bolstering the monarch is sure to come at the expense of their less famous, less charismatic, but far rarer brethren. An endangered listing should be reserved for animals much closer to the brink, such as the Mariana wandering butterfly, which hasn't been seen in more than 20 years. This species is known only from the Mariana Islands, where, incidentally, the monarch introduced itself and is thriving. Virtually nothing has been spent to protect the Mariana wanderer."

Another concern with the petition to list the monarch as threatened under ESA is its negative consequences on educators, butterfly farmers and the general public. Since 1986, as an amateur lepidopterist, my background with butterflies, including the monarch, has been principally on the study of the early stages. In 2010, I launched the website <http://www.raisingbutterflies.org> in order to raise awareness on the benefits (and fun) of witnessing the miracle of metamorphosis by sharing practices on how to find and take care of caterpillars, rear them to pupa, and witness the emergence of live butterflies. In 2012, I joined two trade associations that support butterfly farmers for releases and events. These two associations are the International Butterfly Breeders Association and the Association For Butterflies.

Although I am not a butterfly farmer myself, I have learned a great deal about butterfly conservation and education from these two associations as I have actively participated in their leadership, yearly conventions, have visited their farms, and have taken courses on the importance of rearing healthy butterflies by proactively maintaining a healthy breeding environment.

Not only are these two trade associations dedicated to raising healthy butterflies, but, they are also regulated by the USDA to comply with strict standards in the transport of common butterflies across state lines to be used for events and releases.

I am also a member of many social media groups where I am seeing a raised awareness from the general public in butterflies generally and monarchs specifically. People are finding monarch caterpillars in their yards and neighborhoods, are sharing photos of their caterpillars, pupae, and emerged monarch butterflies on social media and have become very enthusiastic about learning more about raising, releasing, witnessing their life history. This increased awareness has grown exponentially due to the nature of online resources and social media.

And now, you are proposing that you regulate this? Do you understand the economics, the scale, and the scope of this one single point?

If the monarch becomes threatened under ESA, monarch breeders, school educators, and the general public, unless provided an exemption from the USFWS, will no longer be able to raise monarchs. I think this would be simply egregious considering overwhelming benefit, common sense, and public support for such activities.

I think THE most important function of the U.S. Fish and Wildlife Service, the U.S. Dept. of Interior, and/or other branch of Federal Govt. is to stop Monsanto from growing GMO roundup ready crops that harm humans and destroys monarch host plants throughout the corn belt. That would be addressing root cause.

Thx, Todd



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