The Kansas Department of Agriculture appreciates the opportunity to provide comment in opposition to a petition to list the monarch butterfly (Danaus plexippus plexippus) under the Endangered Species Act of 1973, as amended.

The Kansas Department of Agriculture is committed to a balanced approach of serving Kansas farmers and ranchers while protecting natural resources. In 2014, KDA demonstrated our commitment to this mission by successfully growing agriculture and agribusiness in the state while providing more than $1.5 million in state funds to landowners to install nearly 850 conservation practices.

Listing of the butterfly will have a significant impact on agricultural production and grazing land management throughout the United States, including those landowners in Kansas in the path of the eastern flyway of the monarch butterfly. More than 98% of the land in Kansas is privately owned. Therefore, coordination and involvement of private property landowners is critical to the success of species conservation. Recent experience with the listing of the Lesser Prairie Chicken has demonstrated that inadequate involvement of private landowners in meaningful ways during the species listing process not only enhances distrust in government, but may actually reduce voluntary adoption of habitat conservation practices.

Rather than listing the monarch butterfly, conservation efforts would be better focused in Kansas by increasing education and the adoption of the Pollinator Habitat Initiative and the Conservation Reserve Program (CP42). In Kansas, voluntary, incentive and market based solutions developed at the state and local level have the highest opportunity for long term success. Regulation, when developed removed from local input and without consideration for local impacts, would not achieve the desired outcome of species and habitat conservation.

Again, we appreciate the opportunity to provide comment and firmly object to the petition to list the monarch butterfly under the Endangered Species Act.

Susan Metzger
Chief of Planning and Policy
Kansas Water Office
900 Jackson Avenue, Suite 404
Topeka, KS 66612
(785) 296-3185
www.kwo.org