

July XX, 2021

The Honorable Deb Haaland
Secretary
U.S. Department of Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland,

We write to strongly encourage you to allow proactive and voluntary conservation efforts for the monarch butterfly to work and ask that you promote these efforts to encourage increased landowner participation. We are opposed to you unfairly punishing American conservationists by using unilateral authority to designate the monarch butterfly as an endangered species, especially as foreign actors are partially responsible for the species' current status. Listing will close the door on proactive conservation work, impede collaborative efforts to recover the species, and will only result in severe economic harm for rural communities.

As you know, over 45 organizations from across the energy and transportation sectors have worked with the U.S. Fish and Wildlife Service (Service) to develop a first-of-its-kind nationwide Candidate Conservation Agreement with Assurances (CCAA) designed to encourage landowners to adopt beneficial measures that increase conservation for the monarch butterfly. This effort is all-encompassing; it spans the entire contiguous 48 states and, with your support, is expected to protect, enhance, and create 2.3 million acres of monarch habitat. In fact, the CCAA will create a widespread network of conserved lands that also help facilitate monarch migration and connection to other areas of suitable foraging, breeding, and resting habitat.

The program is working exactly as intended. An electric cooperative, headquartered in Braham, Minnesota, entered into a first-of-its-kind CCAA for the monarch butterfly last year. The cooperative is implementing management practices to benefit monarch conservation while creating an effective model for use in the energy sector nationwide.¹ With your leadership, this program could be just the start of countless conservation success stories.

Last December, the Service published its 12-month finding for the monarch butterfly in the Federal Register. In the 12-month finding, the Service outlined that the primary threats to the monarch are "loss and degradation of habitat" along with irresponsible logging "at overwintering sites in Mexico."² Specifically, the Service noted that the loss of milkweed is especially problematic as monarch

¹ Kanabec County Times, *ECE first MN co-op to receive pollinator certificate*, http://www.moraminn.com/news/ece-first-mn-co-op-to-receive-pollinator-certificate/article_0762caf2-08a7-11eb-8446-1fdd8417c9a5.html

² Federal Register, *Endangered and Threatened Wildlife and Plants; 12-Month Finding for the Monarch Butterfly*, U.S. Fish and Wildlife Service, December 17, 2020, p. 81814, <file:///X:/Water,%20Power%20&%20Oceans/ESA/Monarch%20Butterfly/DOI%20Monarch%20Butterfly.pdf>.

“reproduction is dependent on the presence of milkweed, the sole food source for larvae.”³ The Interior Department should not punish Americans participating in voluntary conservation efforts by listing the species and should hold other governments accountable for habitat degradation within their borders.

Under the CCAA, energy and transportation companies address these threats by providing “habitat for the species along energy and transportation rights-of-way corridors across the country, including a 100 foot extension of the right-of-way onto private agricultural lands” and carrying out conservation measures to reduce or remove threats to the species and create and maintain habitat annually.”⁴ The conservation measures under the CCAA will provide “over 300 million additional stems of milkweed”⁵ which will be critical for recovery.

We believe that by encouraging CCAA’s like this one and other voluntary efforts are the most effective way to ensure adequate conservation for the monarch. This approach allows those who would be impacted the most by a potential listing to proactively invest in essential conservation efforts. If the Service rushes to list the species, it will close the door on future conservation efforts like this and would result in stringent regulations that could have substantial economic impacts on communities across the country. For those reasons, we encourage you to allow this CCAA to continue working while collaborating with other local governments and stakeholders to promote this effort to increase participation. Instead of disrupting successful American conservation efforts, we encourage you to work with other government agencies to ensure that similar conservation efforts are undertaken in Canada and Mexico as they hold essential habitat and wintering grounds for the monarch butterfly.

As conservationists, we know we can work together to uphold successful conservation programs for the monarch butterfly without punishing good actors. Thank you for your consideration and we look forward to working with you to ensure adequate conservation of the monarch without causing substantial economic harm.

Sincerely,

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Member of Congress

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Member of Congress

³ Ibid.

⁴ Ibid, 81815.

⁵ Ibid.