

November 13, 2014

The Honorable Sally Jewell, Secretary of the Interior
United States Department of the Interior
1849 C Street NW
Washington, D.C. 20240

The Honorable Daniel Ashe, Director, U.S. Fish and Wildlife Service
1849 C St. NW
Washington, D.C. 20240

Mr. Douglas Krofta, Chief, Branch of Listing, Endangered Species Program, U.S. Fish and Wildlife Service
4401 North Fairfax Drive, Room 420
Arlington, VA 22203

Dear Madam Secretary of the Interior, Mr. Ashe, and Mr. Krofta,

On August 26, 2014, The Center for Biological Diversity, Center for Food Safety, The Xerces Society for Invertebrate Conservation, and renowned monarch scientist Dr. Lincoln Brower filed a legal petition with the U.S. Fish and Wildlife Service (Service) seeking Endangered Species Act (ESA) protection for monarch butterflies, whose numbers have dropped dramatically over the past two decades.

The undersigned companies and organizations write to you to express support for that legal petition and protecting the monarch butterfly as a threatened species under the ESA. The North American monarch butterfly population has declined by 90 percent in the past 20 years, dropping from a high of approximately 1 billion butterflies in the mid-1990s to less than 35 million butterflies last winter – the lowest number ever recorded.

While many factors threaten the monarch's survival and vitality, the loss of habitat, specifically the loss of milkweed plants throughout Midwest monarch breeding grounds, is a leading catalyst in the butterfly's alarming population decline. Milkweed is critical for monarch butterflies to reproduce, as it is the only source of food monarch larvae can eat. The rapid loss of milkweed is a consequence of the widespread planting of genetically engineered (GE) crops. The vast majority of GE crops are made to be resistant to the herbicide glyphosate, a potent killer of milkweed. The dramatic surge in glyphosate use with GE crops has virtually wiped out milkweed plants in Midwestern corn and soybean fields, and in turn, significantly impacted the ability of monarch butterflies to reproduce. In addition to the loss of key breeding habitat, other threats to monarch butterflies include climate change, severe weather events, logging in overwintering sites, widespread use of systemic insecticides, disease, and predation.

Monarchs need a very large population size to be resilient to threats from severe weather events and predation. A significant percentage of the overwintering population in Mexico is eaten by bird and mammal predators in any single winter, and a single winter storm in 2002 killed an estimated 500 million monarchs – 14 times the size of the entire current population.

Given the serious threats facing the now dwindling monarch population, we respectfully request that the Service take swift and effective action by granting the monarch butterfly protection as a threatened species under the ESA. Securing ESA protection for monarchs will allow the Service to initiate a monarch recovery plan with the necessary resources to restore long-term, healthy populations of monarchs. ESA protection will also bring much needed funding to monarch conservation efforts and will increase awareness of the butterfly's plight.

Once protection is granted and the development of a monarch recovery plan begins, we ask that the Service actively engage citizen-scientist groups involved with monarch restoration efforts, public interest groups, and agronomists and farmers with expertise in sustainable agriculture. The monarch butterfly is North America's most well-known and cherished insect. Without immediate action to protect this species and restore critical milkweed habitat, the spectacular migration of the monarch butterfly may no longer be an experience for future generations to enjoy.

Sincerely,

Advocates for Snake Preservation	Clean Air Watch
Alameda Creek Alliance	Clif Bar
Albert Lea Seed House	Coal River Mountain Watch
All-Creatures.Org	Coalition for Sonoran Desert Protection
Allegheny Defense Project	Coast Range Association
Alliance for the Wild Rockies	Coastal Plains Institute and Land Conservancy
Amy's Kitchen	Conservation Congress
Animas Valley Institute	Conservation Northwest
Anne Arundel Bird Club	Conservatives for Responsible Stewardship
Association for the Tree of Life	Cottonwood Environmental Law Center
Audubon Society of New Hampshire	Cougar Rewilding Foundation
Beyond Pesticides	Crawford Stewardship Project
Biscayne Bay Waterkeeper	Crosstimbers Connection
Black Warrior River Keeper	CT NOFA
Blue Heron Nature Preserve	DC Environmental Network
Bold Visions Conservation	Delaware Audubon Society
Born Free USA	Delaware-Otsego Audubon Society (NY)
Borneo Project	Dogwood Alliance
California Interfaith Power & Light	Dr. Bronner's Magic Soaps
California Peace and Freedom Party	Earth Day Coalition
California Wildlife Foundation/ California Oaks	Eastern Coyote/Coywolf Research
Californians for Alternatives to Toxics	Eco-Eating
Californians for Western Wilderness	Eco-Justice Collaborative
Cascades Raptor Center	Ecological Farming Association
Catholic Rural Life	Ecology Party of Florida
Center for Environmental Health	Ecumenical Eco-Justice Network
Center for Media and Democracy	Endangered Habitats League
Center of Concern	Endangered Species Chocolate
Cheesemans' Ecology Safaris	Endangered Species Coalition
Chocolay Raptor Center	Environment America
Citizens Campaign for the Environment	Environment Georgia
Citizens for Safe Water Around Badger	Environmental Action Committee of West Marin
Citizens for Sludge-Free Land	Environmental Defenders of McHenry County

Environmental Defense Council Inc.
Epic-Environmental Protection Information
Center
Equal Exchange, Inc.
Family Farm Defenders
Fairmont, MN Peace Group
Fig Food Company
Florida Institute for Conservation Science
Food and Water Watch
Food Empowerment Project
Four Harbors Audubon
Friends of Bell Smith Springs
Friends of Blackwater
Friends of Brook Park
Friends of Bumping Lake
Friends of Cloquet Valley State Forest
Friends of Matanzas
Friends of Merrymeeting Bay
Friends of the Earth
Fund for Wild Nature
G.A.R.D.E.N Inc.
Georgia Botanical Society
Georgia ForestWatch
Gifford Pinchot Task Force
Global Exchange
Global Green USA
Global Justice Ecology Project
GMO Inside
Grand Canyon Trust
Great Old Broads for Wilderness
Green America
Green Party of Tennessee
Greenpeace USA
High Mowing Organic Seeds
Hilton Pond Center for Piedmont Natural History
Howard County Bird Club
Humane Society of the United States
Idaho Sporting Congress, Inc.
Imagination Heals
Institute for Social Ecology
Intercommunity Ecological Council of Women
Religious
International Fund for Animal Welfare
Iowa Environmental Council
Jayhawk Audubon Society
Kalmiopsis Audubon Society
Kentucky Heartwood
Keystone Prairie Dogs
Klamath Forest Alliance
Klamath-Siskiyou Wildlands Center
KyotoUSA

Latina Lista
Law Office of David H. Becker, LLC
Life of the Land (Hawai`i)
Los Padres Forest Watch
Maricopa Audubon Society
Marin Audubon Society
Maryknoll Sisters Eastern USA
Maryland Ornithological Society
Maryland Ornithological Society
Massachusetts Forest Watch
Matanzas Riverkeeper
Midwest Organic and Sustainable Education
Service
Minnehaha Chapter Izaak Walton League
Minnesota Center for Environmental Advocacy
Minnesota River Valley Audubon Chapter
MOMS Advocating Sustainability
MOM's Organic Market
National Audubon Society
Native American Seed
Nature's Path Foods
NETWORK, A National Catholic Social Justice
Lobby
Neuse Riverkeeper Foundation
NOFA-NH
North County Watch
Northeast Organic Farming Association-Interstate
Council
Northeast Organic Farming Association of New
York
Northeastern Minnesotans for Wilderness
Northern Arizona Audubon Society
Northern Minnesotans for Wilderness
Northwest Environmental Defense Center
Oasis Earth
Ohio Valley Environmental Coalition
One More Generation
Oregon Wild
Organic Consumers Association
Organic Seed Alliance
Partnership for Earth Spirituality
Pesticide Action Network
Pesticide Free Zone
Prairie Moon
Preserve Lamorinda Open Space
Preserve Our Wildlife
President of Animals Are Sentient Beings, Inc.
Project Native
Protect All Living Species
Rainforest Relief
Raptors Are The Solution

Renewable Communities Alliance
RESTORE: The North Woods
Russian Riverkeeper
S.C. Sierra Club
San Bernardino Valley Audubon Society
Save Our Cabinets
Save Our Sky Blue Waters
Save The Frogs!
Sequoia Forest Keeper
Severn Riverkeeper
Sierra Club
Sierra Nevada Conservation
Sisters of Charity of Nazareth Congregational
Leadership
Slow Food USA
Small Planet Institute
South Florida Audubon Society
South Florida Wildlands Association
Southern Appalachia Mountain Stewards
Students for a Just and Stable Future/Better Future
Project
Sustain US: U.S. Youth for Sustainable
Development
Sustainable Arizona
Sustainable Energy & Economy Network
Sustainable Sanctuary Coalition
Tennessee Chapter Sierra Club
Tennessee Ornithological Society
The Alaska Wildlife Alliance
The Alliance for Appalachia
The Blue Ridge Wildlife Center
The Central Conference of American Rabbis

The Interfaith Council for the Protection of
Animals and Nature
The Land Connection
The Lands Council
The Mankato Area Environmentalists
The Orange County Interfaith Coalition for the
Environment
The Rewilding Institute
The Safina Center
Trevino Toda Media, LLC
Tri-City Ecology Center
Tri-Valley CAREs
Union for Reform Judaism
United Methodist Caretakers of God's Creation
Utah Physicians for a Healthy Environment
Ventana Wilderness Alliance
Veritable Vegetable
Vilicus Farms
Walden's Puddle Wildlife Rehabilitation and
Education Center
WaterLegacy
Watershed Management Group
Western Nebraska Resources Council
Wild Equity Institute
Wild Farm Alliance
Wild Nature Institute
Wild South
WildCare
WildEarth Guardians
Wilderness Watch
Wildlife Advocacy Project
Williamsburg Climate Action Network