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All-Creatures.org • American Indian Mothers Inc. • Animal League Defense Fund
Animal Welfare Institute • Animals Are Sentient Beings, Inc. • Animas Valley Institute
Bayou City Waterkeeper • Bold Visions Conservation • California Interfaith Power & Light
California Native Plant Society • Californians for Pesticide Reform
Cascades Raptor Center • Cascadia Wildlands • Center for Biological Diversity
Center for Large Landscape Conservation • Church of Earth Healing
Citizens Committee to Complete the Refuge • Ciudadanos Del Karso • Clean Air Watch
Coal River Mountain Watch • Conservation Congress • Conservation Northwest
Crawford Stewardship Project • DC Environmental Network • Defenders of Wildlife
Delaware Audubon Society • Dogwood Alliance • Ecology Party of Florida
Endangered Habitats League • Endangered Species Coalition • Environmental Action
Committee of West Marin • Environmental Protection Information Center
Fairmont, MN Peace Group • Food & Water Watch • Food Empowerment Project
Friends of Ozark Hellbenders • Friends of the Bitterroot • Fund for Wild Nature
GARDEN, Inc. • Georgia ForestWatch • Global Justice Ecology Project
Greater Hells Canyon Council • Gunpowder Riverkeeper • Hawk Mountain Sanctuary
Association • Hoosier Environmental Council • Houston Audubon Society
Howard County, MD Bird Club • Humane Society Legislative Fund • Juniata Valley
Audubon Society • Kentucky Environmental Foundation • Kentucky Waterways Alliance
Kettle Range Conservation Group • Klamath Forest Alliance • LEGACY – The Landscape
Connection • Lehigh Valley Audubon Society • Louisiana Audubon Council
Madison Audubon Society • Maricopa Audubon Society • Maryland Ornithological Society
Massachusetts Forest Watch • MountainTrue • Mujeres de la Tierra • Nature Abounds
NM Interfaith Power and Light • North County Watch • Northeast Oregon Ecosystems
Occidental Arts and Ecology Center • Oregon Natural Desert Association • Oregon Wild
Pesticide Action Network • Pesticide Free Zone • Predator Defense
Preserve Lamordina Open Space • Project Coyote • Public Lands Project
Rainier Audubon Society • Raptors Are The Solution • Sailors for the Sea
San Bernardino Valley Audubon Society • Save Our Cabinets • Save Our Sky Blue Waters
Seven Generations Ahead • South Florida Wildlands Association • Sustainable Sanctuary
Coalition • The Cougar Fund • The Humane Society of the United States • The Lands
Council • The Safina Center • The Valley Women’s Club’s Environmental Committee for
the SLV • Turtle Island Restoration Network • Ventana Wilderness Alliance • VINE
Sanctuary • Wild and Scenic Rivers • WildEarth Guardians • Wildlands Network • Winyah
Rivers Foundation • Xun Biosphere Project • Yellow Dog Watershed Preserve**

November 28, 2017

The Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

The Honorable Leonard Jordan
Acting Chief
Natural Resources Conservation Service
1400 Independence Ave., S.W., Room 5105-A
Washington, DC 20250

Re: NRCS funding for monarch butterfly conservation and habitat restoration.

Dear Secretary Perdue, Acting Chief Jordan,

On behalf of our organizations and millions of members, we are writing to ask the Natural Resources Conservation Service (NRCS) to substantially increase the amount of funding spent on the conservation of monarch butterflies and the restoration of their habitat. Last year, the NRCS spent only \$4 million to help combat the monarchs' decline, not enough to even begin stemming the loss of milkweed habitat.¹ And while the NRCS has taken some early steps toward slowing the monarch decline — including the implementation of the Monarch Butterfly Habitat Development Project and financial contributions to the Monarch Butterfly Conservation Fund—much more needs to be done to increase milkweed habitat to restore the monarch population so that it is resilient to threats from habitat loss, pesticides, severe weather, and climate change .

Once a familiar sight, today the monarchs' future is very much in doubt. Populations have fallen by more than 80 percent over the past 20 years, and scientists at the U.S. Geological Survey estimate that there is nearly a 60 percent chance the monarch's spectacular, multigenerational migration could completely collapse within the next 20 years. Biologists at the U.S. Fish and Wildlife Service are so concerned that in 2014 they concluded the butterflies may need protection under the Endangered Species Act (ESA).²

The monarch population has been decreasing towards extinction due to landscape-scale threats from pesticides, development and global climate change. Although illegal logging and severe weather have contributed to the decline, the overwhelming concern is the large-scale use of herbicides that destroy milkweed—the monarch caterpillar's sole host plant and only food source. Despite its necessity to the butterflies, milkweed decreased by 21 percent in the U.S. between 1995 and 2013.³ The heart of the monarch's range is the Midwestern “Corn Belt,” where most of the world's monarchs are born on milkweed plants growing in agricultural fields. Because of the ubiquitous spraying and increased use of the herbicide glyphosate (Roundup) and neonicotinoids on corn and soy, nearly 165 million acres of milkweed has been lost.

Accordingly, restoring the monarch butterfly and its habitat will require a substantial contribution from the agricultural sector and strong leadership from the NRCS. Agricultural lands encompass 77% of all prospective monarch habitat, and thus are indispensable to reaching these goals.⁴

In 2015, the *National Strategy to Promote the Health of Honey Bees and Other Pollinators* included a government-wide goal for the monarch butterfly:

Increase the Eastern migratory population of the monarch butterfly to 225 million butterflies occupying an area of approximately 15 acres (6 hectares) in the

¹ See News Release, *USDA launches new conservation effort to aid monarch butterflies* (Nov. 2015) available at: <https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/newsroom/releases/?cid=nrcseprd414821>

² A final decision as to whether the status of the monarch warrants ESA protection is expected by mid-2019.

³ See Flockhart et al., *Unravelling the annual cycle in a migratory animal: breeding-season habitat loss drives population declines in monarch butterflies*, *Journal of Animal Ecology* (2014) available at: <http://norrislab.ca/wp-content/uploads/Flockhart-et-al.-In-press.pdf>

⁴ See W. Thogmartin et al., *Restoring monarch butterfly habitat in the Midwestern US: 'all hands on deck'*, *Environ. Res. Lett* 12 (June 2017).

overwintering grounds in Mexico through domestic/international actions and public-private partnerships, by 2020.⁵

Scientists estimate that to meet this goal, the U.S. would need to plant approximately 1.6 billion milkweed stems to restore the monarch's summer habitat. This would translate to a population of 225 million butterflies and the goal of six hectares of overwintering forest outlined above.⁶ This population goal is still substantially lower than the monarch butterfly population in the early 1990s, which was over a billion monarch butterflies and 10 hectares of overwintering forest cover, but reaching the six-hectare goal would drastically reduce the likelihood of monarch extinction.

The cost of restoring one million acres of milkweed per year would be at least \$100 million annually based on the government's own assessment of milkweed restoration costs. Given the NRCS's history of investing resources in the conservation of imperiled wildlife to avoid listings under the ESA, taking a similar approach to monarchs would be a good investment in the NRCS's conservation budget. Spending \$100 million per year to help avoid the need to list the monarch is not even unprecedented for the NRCS. For example, over the past few years, the NRCS spent more than half a billion dollars (\$507.5 million) on its Sage Grouse Initiative to help prevent the grouse's listing under the Endangered Species Act.⁷

Despite the urgent need for more funding to restore the monarchs' habitat, in its 2018 budget justification the USDA committed no new funding for the conservation of monarchs or pollinators in general. Instead, it is simply relying on existing funds from the Wetlands Reserve Program (WRP) "until 2018 or until they are fully expended."⁸

To save the monarch, NRCS must boost funding for the Conservation Reserve Program and enroll more marginal cropland into that program, fully fund and utilize acres within the conservation programs that currently exist, such as the Conservation Stewardship Program (CSP), and create new programs specifically designed to benefit imperiled monarchs and their habitat. Within the CSP, there are about 10 million acres that the NRCS can designate towards increasing beneficial monarch habitat. Now more than ever, effective action is needed to address the plight of the monarch butterfly before it is too late.

Sincerely,

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⁵ See Pollinator Health Task Force, *National Strategy to Promote the Health of Honey Bees and Other Pollinators* (May 2015) available at: <https://obamawhitehouse.archives.gov/sites/default/files/microsites/ostp/Pollinator%20Health%20Strategy%202015.pdf>

⁶ See W. Thogmartin et al., *supra* note 4.

⁷ See NRCS, *Sage Grouse Initiative 2.0 Investment Strategy, FY 2015-2018* (August 2015).

⁸ See 2018 USDA Budget Congressional Justifications, *Natural Resources Conservation Services* at 27-129, available at: <https://www.obpa.usda.gov/27nrcsexnotes2018.pdf>

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