

**Congress of the United States**  
Washington, DC 20515

August 2, 2022

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

Dear Secretary Haaland,

We write, again, with renewed urgency, to request that you use your emergency authority under the Endangered Species Act (ESA) to help save the western monarch butterflies. Recently, the International Union for Conservation of Nature (IUCN) placed the migratory monarch on its endangered species list. We hope that the United States Department of Interior follows the lead of the IUCN and grants immediate emergency protections under the ESA to the western monarchs in order to give the species the greatest chance of survival and recovery.

On July 21, the IUCN declared the western monarch butterfly endangered following years of habitat destruction and rising temperatures which have decimated the global monarch population<sup>1</sup>. Not just beautiful and iconic, monarch butterflies are critical to the health of our planet and its ecosystems. Conserving biodiversity supports communities by providing essential services such as food, water, and jobs. Given the importance of this iconic pollinator, the United States must now lead by taking decisive emergency action under the ESA to save the western monarch.

As pollinators, the monarch butterfly's migration across the continent is necessary to sustain many critical ecosystems. Changes in the monarchs' migration patterns and the decline of their population impacts all of us. Ultimately, these changes affect our human food systems, as pollinators play an important role pollinating many food crops and 75 percent of the world's flowering plants. In the last decade, the monarch's native population has shrunk between 22 percent and 72 percent. The loss of these butterflies underscores a looming extinction crisis worldwide, with profound consequences for humans and our planet if we once again fail to act.

While the Western part of the United States gets hotter and drier, butterfly populations are quickly vanishing. Recent studies show that a majority of 450 species across 11 Western states are plummeting in numbers<sup>2</sup>. Although the drivers of decline are complex, research acknowledges climate change—particularly extended warm months in the autumn—as a driving

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<sup>1</sup> <https://www.iucn.org/press-release/202207/migratory-monarch-butterfly-now-endangered-iucn-red-list>

<sup>2</sup> <https://www.science.org/doi/10.1126/science.abe5585>

factor pushing this population toward extinction. The combination of more out-of-season storms, severe temperature drops, and excessive rain has resulted in the deaths of hundreds of millions of butterflies over the last decade<sup>3</sup>. The pervasive declines demand the federal government intervene and develop a new approach for pollinator conservation.

The western monarch is at the greatest risk of extinction, with its population declining from as many as 10 million in the 1980s to less than 2,000 last year. Although the IUCN understandably declared western monarch butterflies endangered, wildlife officials in the United States have yet to grant federal protections for the monarch under the ESA. In 2019, we asked the U.S. Fish and Wildlife Service (FWS) to protect western monarch butterflies. Following our request, the FWS found that adding the monarch butterfly to the list of endangered species is warranted but precluded by work on higher-priority listing actions.<sup>4</sup> Ultimately, our request was rejected by the FWS. Unfortunately, delays in providing such emergency protections by the United States government for monarch butterflies has led to devastating consequences, including the alarming, continued decline of their populations. We simply do not have time for inaction, as the western monarch butterfly is now even more at risk of being lost forever. As Secretary, we ask that you reconsider the short-sighted decision by the FWS to postpone critical protective actions.

The ESA is the world's most powerful tool to prevent extinction because Congress gave the FWS the authority to intervene early to proactively protect wildlife before a species reaches the precipice of global extinction. When Congress passed the ESA in 1973, we effectively charged the FWS to act before a species reaches the stage where it is "threatened with worldwide extinction."<sup>5</sup> Moreover, under the ESA, you have the authority to immediately protect western monarch butterflies as an endangered species. This is the urgent and proactive approach the Department of the Interior must immediately take to save critical pollinator populations.

Protecting the western monarch butterfly will require the FWS to also protect the eastern population. The larger eastern population also shrunk by 84 percent between 1996 and 2014. Your scientists predict that the eastern monarch also faces likely extinction in next few decades, and the spectacular multi-generational migration could collapse even sooner.<sup>6</sup> Protecting all monarchs now will provide an enormous conservation benefit, push the entire Department of Interior to truly take a landscape conservation approach to conserving pollinators, and save one of the greatest wildlife migrations on the planet from disappearing in our lifetimes.<sup>7</sup> The science is overwhelmingly clear and proves that we cannot wait and we must act now.

Due to their dramatic decline and undoubted value as pollinators, the western monarch butterfly must be a priority to be protected. We are extremely concerned about their population and care about the cultural and ecological importance that monarchs hold across the nation. Congress has

<sup>3</sup> <https://www.nps.gov/articles/monarch-butterfly.htm>

<sup>4</sup> "Endangered Species Act Listing for Monarch Butterfly Warranted but Precluded: U.S. Fish & Wildlife Service." FWS.gov, 15 Dec. 2020, <https://www.fws.gov/press-release/2020-12/endangered-species-act-listing-monarch-butterfly-warranted-precluded>.

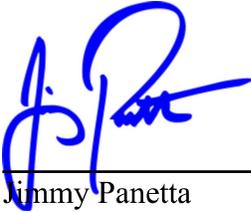
<sup>5</sup> H.R. Rep. No. 93-412, at 2 (1973).

<sup>6</sup> U.S. Fish and Wildlife Service, Monarch Species Status Assessment Report Draft (June 2018)

<sup>7</sup> On average, species on the candidate list have waited 12 years for protection, and at least 47 species have gone extinct waiting for protection. See Puckett et al., Taxa, petitioning agency, and lawsuits affect time spent awaiting listing under the US Endangered Species Act, *Biological Conservation* 201 (2016) 220-229; see also Greenwald N et. al. 2019. Extinction and the U.S. Endangered Species Act. *PeerJ* 7:e6803 DOI 10.7717/peerj.6803

entrusted you through the laws of the ESA to lead and act, when necessary, to protect our nation's wildlife and to give the benefit of the doubt to the species when it comes to their protection.<sup>8</sup> We strongly believe that the United States must continue its leadership by acting accordingly to protect species that are on the verge of extinction and implore you to use the ESA to help preserve western monarch butterflies.

Sincerely,



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Jimmy Panetta  
Member of Congress



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Salud Carbajal  
Member of Congress

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<sup>8</sup> See *Tenn. Valley Auth. v. Hill*, 437 U.S. 153 (1978); *Conner v. Burford*, 836 F.2d 1521 (9th Cir. 1988).