



March 10, 2025

Dear US Fish and Wildlife Service,

I am writing on behalf of the Arkansas Audubon Society, a statewide organization committed to fostering a greater knowledge of the natural history of Arkansas and promoting conservation of the state's natural resources. **We support the listing of the Monarch Butterfly (*Danaus plexippus*) as threatened under the Endangered Species Act.** We also support the designation of critical habitat wherever necessary throughout this species' range to support its recovery.

Like many conservation entities, we have been concerned by the drastic population declines of the North American populations of this species. Their complicated life history, spanning many states and three countries, makes conservation difficult, which is another reason why these efforts should be overseen at the federal level. Indeed, their unique life cycle is yet another reason to declare them threatened. Monarchs fly through Arkansas in the spring and again in the fall, migrating to and from their overwintering grounds in Mexico. A few monarchs even stay in the state throughout the summer. It has also been documented that a generation of monarchs, possibly a fifth generation, is born in Arkansas in late summer, making Arkansas a locus of critical habitat for both breeding and migrating monarchs.

In 2015, Arkansas published a Wildlife Action Plan which designated the monarch as a Species of Greatest Conservation Need. This designation was based on "the drastic decline of the migratory subspecies" and the recommendation of the Association of Fish and Wildlife Agencies. At that time, habitat loss was noted as the main threat to this species, and data gaps such as identifying migratory corridors and determining important areas within the state for breeding monarchs needed to be filled. There is still much work to do to benefit this species in Arkansas. Arkansas's plan is currently being revised with new information, which will provide new rankings and updated concerns. It is our belief that the status of the monarch in Arkansas has only worsened since 2015. Federal listing and designation of critical habitat will support conservation efforts throughout its range and throughout Arkansas.

Thank you for considering this comment. We are hopeful that the Service will take this important step towards preserving this iconic species.

Sincerely,

Kevin J. Krajcir, M.S.
Conservation Chair
Arkansas Audubon Society