<Date>

Martha Williams

Director

U.S. Fish & Wildlife Service

c/o Public Comments Processing

Attn: FWS-R3-ES-2024-0137-0001

U.S. Fish and Wildlife Service, MS: PRB/3W

5275 Leesburg Pike

Falls Church, VA 22041-3803.

**Re: Docket Number FWS-R3-ES-2024-0137-0001**

Comments on the U.S. Fish & Wildlife Service (“USFWS”) proposed rule to list the monarch butterfly as a threatened species and designate critical habitat

Dear Director Williams,

The <MC program name> is pleased to submit comments on the U.S. Fish and Wildlife Service (USFWS) proposed rule to list the monarch butterfly as a threatened species and designate critical habitat, as published in the Federal Register on 12 December 2024.

<Describe your program, mission and vision. Emphasize the role you play in protecting public health, comfort and economy in your region.> Through its efforts, <MC program name> enhances public health, comfort, and the overall visitor experience in <County/Municipality>, <State>.

While <MC program name> supports conservation efforts for monarch butterflies, we have significant concerns about the potential unintended consequences of the proposed rule, particularly its impact on mosquito control activities in <County/Municipality>. Given the ongoing public health risks posed by mosquito-borne diseases in <State>, it is essential that our public health protection measures are not hindered by overly broad regulatory interpretations. Without effective mosquito control, <County/Municipality> faces increased public health risks and disruptions to the Florida’s tourism-driven economy<or your local concern>,.

We offer the following comments to ensure that the listing of the monarch butterfly does not result in unnecessary public health and economic consequences due to potential restrictions on mosquito control efforts in <County/Municipality>.

4(d) Whether we should include an exception for the use of pesticides and, if so, what measures are reasonable, feasible, and adequate to reduce or offset pesticide exposure to monarchs from agricultural and non-agricultural uses ( *e.g.,* rangeland, rights-of-way, forestry, commercial areas, and mosquito control), including measures for specific classes of pesticides ( *e.g.,* herbicides, insecticides), pesticide uses, and application methods

The USFWS identifies pesticide exposure, particularly from insecticides, as a probable factor contributing to the decline of monarch butterflies (Federal Register, pages 100672-100673). Specifically, the agency emphasizes the impact of insecticides used in vector control programs, including pyrethroids and organophosphates.

Ultra-low volume (ULV) adulticide applications differ fundamentally from agricultural and forestry insecticide applications. <Describe how you perform mosquito control, specifically addressing how adulticide applications are performed in your County/Municipality. What protection measures are in place to reduce non-target impacts? Cite sources if available.>

Vector control, including mosquito control, is not a one-size-fits-all approach. While there are recognized industry best management practices, their implementation is highly regional and dependent on various factors such as state regulatory requirements, climate, surrounding habitat, disease risk, mosquito species present, and their susceptibility status.

<Why is adulticiding important for your operations? What impact could loosing adulticide have on your operations? Is there mosquito-borne disease in your area? Does your area have any unique environmental characteristics specific to mosquitoes? Cite sources if available.> Without effective mosquito control in the form of aerial and ground adulticiding, these factors could elevate public health risks, diminish quality of life, and disrupt the county’s tourism-driven economy.

<MC program name> supports the listing of the monarch butterfly as a threatened species; however, we respectfully propose that ***incidental take resulting from routine mosquito control insecticide applications, when conducted in accordance with existing or revised label guidelines and established best management practices, be exempt from the prohibitions outlined under the 4(d) rule.*** We further recommend that these exemptions be explicitly documented through the Bulletins Live! Two system, similar to the mosquito control mitigations outlined in the EPA’s Vulnerable Species Action Plan and the Malathion Biological Opinion.

This proposed approach would provide regulatory clarity for mosquito control professionals, ensuring the continued protection of public health and the economic vitality of <County/Municipality> while supporting the conservation of monarch butterfly populations. By collaborating with local USFWS offices, mosquito control programs can develop best management practices tailored to local conditions, balancing regional public health and comfort needs with the preservation of local monarch butterfly populations, <as required under Chapter 388.0101 of the Florida Statutes<include if you represent a Florida district>.

Sincerely,

<Signature, Name, Contact Information>