



Submitted via www.regulations.gov

January 29, 2025

Ms. Barbara Hosler
Regional Listing Coordinator
Public Comments Processing
Attn: FWS-R3-ES-2024-0137
U.S. Fish and Wildlife Service
MS: PRB/3W
5275 Leesburg Pike
Falls Church, VA 22041-3803

Re: Request for Review of the Proposed Listing of the Monarch Butterfly as Threatened and Designation of Critical Habitat

Dear Ms. Hosler:

Western Energy Alliance is concerned about the proposal to list the Monarch Butterfly as a threatened species and designation of critical habitat. Given President Trump's Executive Order (EO) "Unleashing American Energy" to encourage oil and natural gas exploration and production on federal lands and waters and protect America's energy dominance and security, we are drawing the new staff's attention to this proposed listing as one of the agency actions that, per Section 3 of the order, "potentially burden the development of domestic energy."

Per Section 3, the proposed listing of the butterfly is one the Fish & Wildlife Service (FWS) should identify as unduly burdensome and begin an action plan to suspend, revise, or rescind. FWS should likewise formally suspend the open public comment period, currently set to terminate on March 12th. Should it be determined that proceeding with a listing is necessary, FWS should give the public sufficient time to review the proposal and associated scientific evidence. The 90 days the service originally gave the public to comment on this proposal was insufficient, and should be at least 150 days.

Thank you for considering this request. We look forward to working with the new administration on sensible species protection and recovery, not the weaponization of species listings as a way to curtail American energy rather than to truly protect vulnerable species. Thank you.

Sincerely,

Kathleen M. Sgamma
President

cc: Walter Cruickshank, Acting Interior Secretary