



March 12, 2025

Ms. Barbara Hosler  
Regional Listing Coordinator  
US Fish and Wildlife Service  
5600 American Boulevard  
Bloomington, MN 55437

*Submitted electronically via regulations.gov*

**RE: Endangered and Threatened Species: Species Status with Section 4(d) Rule for Monarch Butterfly and Designation of Critical Habitat Docket No. FWS-R3-ES-2024-0137**

Dear Ms. Hosler,

The Illinois Farm Bureau® (“IFB”) appreciates this opportunity to comment to the US Fish and Wildlife Service (“the Service”) on the *Endangered and Threatened Species: Species Status with Section 4(d) Rule for Monarch Butterfly and Designation of Critical Habitat*. The purpose of these comments is to emphasize on benefits of coordinating efforts, suggest clarifying aspects of the conversion language and share IFB’s on-going efforts to promote pollinators habitats in Illinois.

IFB is a member of the American Farm Bureau Federation® (“AFBF”), a national organization of farmers and ranchers. Founded in 1916, IFB is a non-profit membership organization directed by farmers who join through their County Farm Bureaus. IFB has a voting membership of more than 74,000, representing three out of four Illinois farmers. IFB appreciates the scientific data utilized to propose the Monarch as “threatened” and the opportunity to implore the Section 4(d) Rule options shared in the proposal.

#### **IFB Supports Collaboration with US Environmental Protection Agency**

IFB appreciates the Service’s cooperation and efforts to work with farmers and ranchers around the country to collect input about the proposed rule. IFB strongly supports the 4(d) Rule exceptions for agricultural practices such as pesticide use. IFB also encourages the Service to align any pesticide mitigation measures with the Environmental Protection Agency’s (EPA) work under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) to avoid confusion and minimize regulatory burdens on farmers and pesticide users. As labels are reviewed and updated by EPA, the best way to communicate location specific pesticide-related protection based on the presence and timing of monarchs is through updating requirements on the label. Mitigation efforts can be effectively achieved by following instructions on updated labels.

#### **Permanent Conversion**

The Service’s proposal references the conversion of agricultural land throughout the document but omits specific parameters around conversion. Recognizing conversion of grasslands to



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agriculture is a dynamic process dictated by markets, IFB recommends including the word permanent conversion where relevant as the inability to fluctuate land use in and out of production may adversely impact conservation efforts. For example, landowners enrolled in voluntary conservation programs such as the Conservation Reserve Program (CRP) should be assured they can return their land back to its original use at the end of their respective contract and that reverting land back to its previous land use would not be considered a conversion of natural habitat.

### **IFB Supports Monarch Butterfly Conservation Efforts**

IFB is committed to the monarch butterfly conservation efforts. Since 2022, IFB has provided funding to support 55 pollinator habitat projects spanning across 28 counties in Illinois. Also, through membership of the American Farm Bureau Federation, IFB supports Farmers for Monarchs. This organization is committed to identifying and implementing solutions on agricultural and ranching lands to achieve a sustainable monarch butterfly population. Additionally, IFB has been a supporter of *Illinois Agriculture for Monarchs*, a coordinated effort led by the Illinois Department of Natural Resources.

### **Conclusion**

Illinois' farmers support being good stewards of the environment, including protecting the monarch butterfly. IFB appreciates the opportunity to engage in a productive dialogue with the Service to providing insight on this important matter. IFB strongly supports the inclusion of general agriculture practices in the 4(d) Rule.

Thank you for your thoughtful consideration of these comments. If you have questions, please contact Amelia Cheek, Associate Director of Environmental Policy, at [acheek@ilfb.org](mailto:acheek@ilfb.org) or 309.530.3220.

Sincerely,

ILLINOIS FARM BUREAU®



Brian Duncan  
President