



TENNESSEE FARM BUREAU FEDERATION

May 16, 2025

Barbara Hosler
Regional Listing Coordinator
U.S. Fish and Wildlife Service
Midwest Region Headquarters
5600 American Boulevard
Bloomington, MN 55437

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

Dear Ms. Hosler:

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to submit comments for the proposed listing of the monarch butterfly. With over 695,000 members, TFBF is the largest general farm organization in Tennessee, representing the varied commodity producers across our state. Our policy is developed through a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies on various issues related to agriculture and rural living. We welcome the opportunity to provide an agricultural perspective to the proposed listing of the monarch butterfly and encourage the United States Fish and Wildlife Service (FWS) to consider these comments and comments submitted by American Farm Bureau Federation.

Farmers in Tennessee have a deep and abiding interest in protecting the environment and listed species based upon philosophical beliefs and practical self-interest. TFBF supports efforts to protect listed species so long as they simultaneously support production agriculture. The agricultural sector has taken extensive strides throughout history to reduce its environmental impact, and we firmly believe production agriculture and species protection can be mutually beneficial to one another.

Existing Pollinator Conservation Programs in Tennessee

Many voluntary and incentive-based programs to protect monarchs and their habitat exist regionally and within states. Many different entities, including the agricultural and conservation communities, state government agencies, land-grant institutions, and the greater public, have a vested interest in protecting the monarch butterfly and understand its crucial role as a pollinator. Tennessee has multiple programs supporting

monarch populations and establishing milkweed habitats. Some examples of those programs are listed below:

- Tennessee Pollinator Habitat Program¹: The Tennessee Department of Transportation (TDOT) aids in growing, supporting, and protecting pollinators across Tennessee through education, partnerships, and sound environmental practices by:
 - Building and maintaining pollinator habitat along their 13,807 miles of state-maintained roadways and near welcome centers and rest stops;
 - Modifying mowing schedules to be compatible with pollinator cycles and utilizing swath mowing practices to reduce costs and increase habitat; and,
 - Creating resources such as signage, print, games, online videos, and learning modules to educate the public about the needs and benefits of pollinators.
- Tennessee Partners for Pollinators Working Group²: Four State of Tennessee agencies (TDOT, Tennessee Department of Environment and Conservation, Tennessee Department of Agriculture, and Tennessee Wildlife Resources Agency), numerous non-profit partners, and consultants meet semi-annually and pursue projects to improve pollinator habitat. Through this partnership, pollinator meadows have been developed within eight state parks across Tennessee.
- Project Milkweed³: Within the Pollinator Habitat Program, Project Milkweed focuses on enhancing milkweed habitat for monarch butterflies and other pollinators through distribution of free milkweed seeds to anyone in Tennessee. In 2023, Project Milkweed distributed 780,000 milkweed seed packets to restore landscapes and create vital habitats for monarchs.
- University of Tennessee Institute of Agriculture (UTIA) Pollinator Support: UTIA engages in monarch studies and habitat support through numerous programs and research opportunities, including:
 - Establishing a Monarch Waystation at the University of Tennessee State Botanical Garden. The Monarch Waystation attracts migrating monarchs and is planted with several species of milkweed for larval development and other pollinator-friendly plants for food and cover. Each fall, a team captures, tags, and releases monarchs and provides data to determine population stability and migration patterns.

¹ “Tennessee Pollinator Habitat Program”, Tennessee Department of Transportation, 5/16/2025, [Tennessee Pollinators Habitat Program | TDOT Pollinator Habitat Program](#)

² “Partners for Pollinators in Tennessee”, Tennessee Department of Transportation, 5/16/2025, [Partners For Pollinators in Tennessee | TDOT Pollinator Habitat Program](#)

³ “Project Milkweed”, Tennessee Department of Transportation, 5/16/2025, [Project Milkweed | TDOT Pollinator Habitat Program](#)

- Managing a pollinator trial. University-owned research and education centers across the state study different pollinators and the plants they depend on. Specifically, the Middle Tennessee Research and Education Center maintains a trial plot studying the activity and prevalence of monarchs and other pollinators and the plants they need for food and cover.
- Educating farmers and the public. By using the studies mentioned above, UTIA researchers and educators disseminate information and techniques to farmers and citizens across the state on how to best support monarchs and other pollinators throughout their daily lives.
- United States Department of Agriculture Conservation Programs: At the federal level, efforts incentivizing farmers to protect pollinator habitat exist across multiple well-known conservation programs. The Conservation Reserve Program (CRP), Environmental Quality Incentives Program (EQIP), and Agricultural Conservation Easement Program (ACEP) all encourage farmers to plant milkweed and other nectar sources on their farm. These programs have experienced longstanding success within the agricultural community.

These programs and others like them across Tennessee and the nation exemplify the success of voluntary, incentive-based initiatives to protect monarchs and their habitat. TFBF is concerned that the listing of the monarch butterfly will disincentivize this type of engagement due to regulatory uncertainties and land-use restrictions placed on areas where monarchs inhabit.

Pesticide Use

The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) designates the Environmental Protection Agency (EPA) as the lead agency for pesticide registration review. This multi-year process happens when a new chemistry is developed and every fifteen years for existing ones. Registration of a product follows many years of research, stakeholder feedback, and examination by EPA scientists and regulators. This includes an ecological risk assessment where EPA studies whether a product adversely affects non-target species.

Through this registration process, EPA has a responsibility to adhere to the requirements of the ESA and consider protections for listed species. EPA has developed a multi-faceted ESA Workplan⁴ to address strategies to better protect listed species during the pesticide registration process. These strategies include imposing mitigation requirements for farmers to reduce runoff, erosion, and spray drift. FWS should

⁴ “EPA’s Workplan and Progress Toward Better Protections for Endangered Species”, Environmental Protection Agency, 5/16/2025, [EPA’s Workplan and Progress Toward Better Protections for Endangered Species | US EPA](#)

recognize EPA as the agency with sufficient expertise to determine pesticide application measures and not over-saturate farmers with additional mitigations separate from EPA's existing process.

Conclusion

Farmers take pride in being stewards of the land to produce the world's food, fiber and fuel. Part of this responsibility is actively working to protect our natural resources and the species which rely on them. On behalf of our member producers, we ask FWS to recognize the many ways monarchs are supported and protected, acknowledging that they do not reach the threshold for protection under the ESA.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry".

Eric Mayberry

President

Tennessee Farm Bureau Federation