



STATE OF NEW MEXICO
DEPARTMENT OF GAME & FISH

One Wildlife Way, Santa Fe, NM 87507

Tel: (505) 476-8000 | Fax: (505) 476-8180

For information call: (888) 248-6866

www.wildlife.state.nm.us

STATE GAME COMMISSION

TIRZIO J. LOPEZ
Vice Chair
Cebolla

FERNANDO CLEMENTE, JR.
Sunland Park

GREGG FULFER
Jal

EDWARD T. GARCIA
Los Ranchos

SHARON SALAZAR HICKEY
Santa Fe

17 October 2023

Ms. Louise Clemency
Midwest Regional Endangered Species Program
U.S. Fish and Wildlife Service

RE: Updated 2023 version (2.2) of the Monarch Butterfly (*Danaus plexippus*) Species Status Assessment Report. NMDGF Project No. NMERT-2901

Dear Ms. Clemency,

The New Mexico Department of Game and Fish (Department) has reviewed the 2023 updated version (2.2) of the Monarch Butterfly Species Status Assessment (SSA) Report. Overall, the Department is supportive of the 2023 SSA for the monarch butterfly. The document cites relevant, up-to-date sources throughout and informs the reader of the current and future status of the monarch. Below are general comments regarding the SSA and comments specific to particular page numbers and sections.

General:

Because monarchs tend to be concentrated in riparian areas in the Southwestern U.S., have there been any efforts to understand how projected drier conditions in this region and outside of California will impact monarch breeding and migration habitats?

Do invasive species (e.g., Tamarisk, Russian olive) pose a threat to monarchs in the west by potentially displacing milkweed plants in riparian areas or removing suitable environmental conditions for milkweed to grow?

Specific:

Pages 3-5: The definitions of the three Rs (resiliency, redundancy, and representation) seem to overlap, especially in their discussion of genetic diversity. Each definition refers to the importance of a species having genetic diversity and maintaining gene flow among populations. Additionally, both resiliency and representation reference the importance or relevance of populations being distributed across heterogeneous environments. The Department suggests modifying the definitions of the three Rs to further differentiate them.

Pages 13-14: The “Species-Level Ecology” section, which explains what is required for monarchs to be resilient, redundant, and representative (the three Rs), seems redundant with the definitions provided on pages 3-5 and referenced above. These earlier definitions were broad enough to be applicable to most species, including the monarch. The definitions on pages 13-14 do not seem to be specific to monarch butterflies. The Department recommends making these definitions more species-specific if they are to be retained in the document.

Page 54, Final paragraph: If they are available, the Department recommends updating the land cover change projections used in this SSA, which references 2000 Intergovernmental Panel on Climate Change (IPCC) Emissions Scenarios, to data that use some of the newer Scenarios produced by the IPCC.

Pages 57-58: In the “Western Population” section, the Department suggests considering whether there is the potential for a loss of overwintering habitat in California resulting from the increasing occurrence, size, and severity of wildfires.

Thank you for the opportunity to provide comments for this SSA. If you have any questions, please contact Jack Marchetti, Aquatic/Riparian Habitat Specialist, at (505) 479-1269 or jack.marchetti@dgf.nm.gov with any questions.

Sincerely,

Matt Wunder, Ph.D.
Chief, Ecological and Environmental Planning Division
cc: USFWS NMES Field Office
Elise Goldstein, Assistant Chief, Wildlife Management Division, WMD