



MIDLAND COUNTY MOSQUITO CONTROL

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Carl W. Doud, PhD
Director

February 21, 2025

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,

Respectfully submitted are comments to the 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.

Midland County Mosquito Control (MCMC) has operated since 1984 serving the residents of Midland County, Michigan to enhance quality of life and mitigate risks of mosquito-borne disease.

The operation is mindful of how mosquito control efforts might impact non-target organisms. As such, a number of practices are carried out to minimize such risk to beneficial insects. For instance, MCMC frequently appeals to county residents requesting them to inform us of the location of honeybee hives. These are then mapped and visible to technicians carrying out mosquito operations so as not to impact bee colonies. A treatment buffer is applied to colonies as an added measure of protection. Adult mosquito control operations are carried out at, or after sunset in most cases when mosquitoes are active/flying and bees are not foraging. Open and frequent communication is maintained with beekeepers and beekeeping clubs. For example, a member of the Saginaw Valley Beekeepers sits on the Mid-Michigan Mosquito Control Technical Advisory Board and reviews/consults MCMC on operations for bee safety. These are but a few examples of how operations are tailored to balance mosquito control while minimizing detrimental environmental impacts.

Despite a great record of caring for the environment, the potential listing of monarchs as threatened has me concerned as it relates to us carrying out our services. Namely, that endangered and threatened species protections are applied at the individual vs. population level. I am **not**

concerned that our control efforts have a negative impact on monarch populations, yet there is no way to ensure we do not affect an individual in the population. And given the expansive range of monarchs associated with their migration, there are many areas that will potentially have monarch individuals present. This species is unlike any other insect listed as threatened or endangered in this way.

There are a number of activities carried out by MCMC that could potentially impact a single monarch caterpillar or adult butterfly that may not even involve the application of pesticides. Simply carrying out surveillance or larviciding operations might inadvertently have a negative impact on individuals merely by walking through if a patch of milkweed.

As it applies to adult mosquito control with ultra low volume (ULV) technology, this method is effective against small-bodied insects such as mosquitoes. But should a monarch get close enough while the product is dispersed, it could have a detrimental effect despite our best efforts to avoid such an outcome.

If it is the Service's position that these instances do not violate efforts to protect the species, MCMC could nevertheless find ourselves under legal threat. As the ESA applies, a local group or individual could file suit against us for an ESA violation involving an individual monarch caterpillar or butterfly in course of carrying out our mission. This would likely cost the district several tens of thousands of dollars and hundreds of man-hours, regardless of the ultimate findings of the case.

I see no way of reliably carrying out our services short of receiving an incidental take permit to protect against such litigation and liability. This will allow us to adopt additional monarch precautions while at the same time being able to carry out our mission for the residents of Midland County.

I am certain that there is overwhelming support for ensuring a robust and healthy population of monarchs. And regardless of whether this process actually results in listing monarch as threatened, there will no doubt be a heightened interest and resolve to protect and conserve monarchs. My hope is that should the species be listed as threatened, there will also be sufficient accommodations for professionals in the mosquito control industry to both protect monarchs and carry out our services without undue risk of ESA violations.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Carl W. Doud", with a long horizontal flourish extending to the right.

Carl W. Doud, Ph.D.
Mosquito Control Director