

## External Stakeholder Talking Points

**The monarch butterfly is in decline and may be listed as an Endangered Species in June 2019 under the Endangered Species Act.**

- The population of monarch butterflies in the eastern U.S. has declined by 80 percent over the last two decades. The winter of 2019 saw a rebound in the annual overwintering eastern population. In contrast, the western U.S. monarch population has declined by 99 percent since the 1980s.
- These declines has put the species in jeopardy and may result in the species being listed as endangered or threatened in the future.
- According to the U.S. Geological Survey, an additional 1.3 billion milkweed stems are needed in the Midwestern U.S. to return monarch butterflies to a viable population size.
- The Presidential Memorandum – Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators and the resulting Pollinator Research Action Plan specifically identify roadsides as a priority area where habitat could be expanded.
- The conservation potential of the CCAA could extend to 26 million acres of energy and transportation lands contributing over 300 million stems of milkweed and 2.3 million acres of monarch foraging habitat over the coming decades.

**If the eastern monarch butterfly population has rebounded, is conservation still needed? Yes, absolutely!**

- The size of the monarch population varies greatly from year to year based on weather conditions. The size of the population in years with poor conditions is a major concern for their long term survival.
- Most monarch biologists agree that the rebound may reflect ideal weather conditions from 2018, and therefore does not reflect long-term population recovery. Monarch generations are vulnerable in unfavorable weather and temperature conditions. Consecutive favorable conditions, like those experienced in spring, summer and fall of 2018 that produce substantial population increases from year to year are extremely rare.
- Habitat conservation, like that encouraged by the CCAA, helps protect monarchs against extreme fluctuations by creating more habitat for them to use and move between under stressful conditions.

**Listing the monarch could have a major impacts on how energy companies and governmental agencies manage their lands.**

- Utilities must keep vegetation from negatively interfering with power lines to maintain electric reliability, mitigate risks from outages, and reduce wildfire risks.
- Transportation departments must manage their roadsides to maintain public safety and transportation infrastructure.
- Federal and state agencies could restrict the ability of these organizations to manage their lands, including how/when they mow and control for vegetation growth and where new electric and road infrastructure could be located.

**The CCAA is an option for companies and agencies to benefit the monarch while providing certainty to their business operations.**

- Recognizing their rights-of-way could provide suitable habitat, more than 40 organizations from the energy and transportation sectors came together to collaborate on conservation for the monarch through the CCAA.
- CCAAs are voluntary conservation agreements focused on implementing measures to benefit a species at risk.
- The agreement will help companies and agencies avoid costly delays and last-minute disruptions to construction and maintenance activities by new species listing requirements.
- This agreement will allow organizations to perform conservation activities, such as creating new habitat and maintaining and modernizing existing infrastructure, on lands they own and manage based on individual plans demonstrating conservation actions that outweigh the effects of covered activities on the monarch.
- Participation in the CCAA demonstrates that organizations are having a net benefit on conserving monarch butterflies across the land they manage. These actions across the geographic scope of energy and transportation lands will make a meaningful contribution to providing habitat resources throughout the continental United States.
- The CCAA will give assurances that no additional regulatory requirements will be imposed by the Fish and Wildlife Service beyond the terms in the agreement.

**Conservation measures in the CCAA are grounded in existing practices of energy and transportation organizations.**

- Each company/agency can pursue what is best for its own unique circumstances – providing operational flexibility.
- The conservation measures included in the CCAA should not adversely affect O&M activities needed on transmission and distribution systems or road/rail ROW.
- An applicant to the agreement can define which conservation measures and covered activities will apply to their managed lands and how they will implement them.
- Implementing the CCAA may involve modifying vegetation management practices and will require monitoring habitat establishment.
- Certain CCAA conservation measures, such as reduced mowing and targeted herbicide treatments, may result in cost savings and create opportunities for staff to focus on other priorities.