

## Listing Deadline Extension Talking Points

### *What does the USFWS extension of the listing determination mean for the CCAA?*

#### **The monarch is still in need of conservation and is still being considered for listing.**

- 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 monarch population. In contrast, the western U.S. monarch population has declined by 99 percent since the 1980s.
- These declines may result in the species being listed by the federal government as endangered or threatened in the future.
- With this extension, the U.S. Fish & Wildlife Service (USFWS) now expects to make its determination by December 15, 2020 instead of in June 2019.
- The extension allows the USFWS to study data from the most recent census of overwintering monarchs, as well as the next survey to be conducted in late 2019. The additional time will provide the USFWS with the data to produce a more scientifically sound determination on the monarch.

#### **The extension provides a unique opportunity for industry to contribute to the monarch listing decision.**

- Participation matters more than ever. Enrollment in the CCAA ahead of the listing decision allows industry partners to demonstrate upfront commitments to monarch conservation.
- Early commitments under the CCAA (i.e., all enrollments before May 2020) will be considered in the USFWS' analysis to inform the listing decision. In the past, upfront conservation commitments have allowed the USFWS to avoid the need to list species under the Endangered Species Act.
- The decision extension now allows more time for improved implementation and program administration. With a longer enrollment period available, it allows Partners and UIC time to begin implementation and refine administrative processes before the listing decision.

#### **Enrolling in the CCAA provides an important, low-risk investment in pollinator conservation and business certainty.**

- Participation in the CCAA will demonstrate that your organization provides a net benefit to conserving monarch butterflies across the lands you manage. These actions across the geographic scope of energy and transportation lands throughout the U.S. will make a meaningful contribution of habitat resources across the monarch butterfly's range.
- The CCAA provides assurances that no additional regulatory requirements will be requested by the USFWS for covered activities given in the agreement. The CCAA will help your organization avoid costly delays and last-minute disruptions to construction and maintenance activities if the monarch butterfly is listed.
- Your organization can define which conservation measures and covered activities will apply to your system and how to implement them, allowing you maximum operational flexibility. The conservation measures included in the CCAA should not adversely affect required O&M activities on transmission and distribution systems, or along road or railroad rights-of-way. Certain conservation measures, such as reduced mowing and targeted herbicide treatments, may also result in cost savings and create opportunities for employees and contractors to focus on other priorities.

## Nationwide Candidate Conservation Agreement for Monarch Butterfly on Energy and Transportation Lands Listing Deadline Extension Talking Points

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- Participation in the CCAA is completely voluntary. As such, we believe there is little or no risk in enrolling. If participation does not suit your organization, you may terminate your participation at any time.
- There are several risks associated with waiting for the listing decision before enrolling in the CCAA.
  - Your organization will not directly demonstrate conservation commitments that could be used by the USFWS to potentially help avoid a listing.
  - Your organization has less time to gather information, conduct coordination, and provide a complete application to enroll in the CCAA.
  - Your organization misses the opportunity to make desired management adjustments or ramp up conservation measures to provide immediate benefits to monarchs in 2019.
  - In the event of a legal challenge to the listing decision after December 2020, your organization will not have the regulatory assurances provided by the CCAA.

### **For More Information:**

U.S. Fish & Wildlife Service's webpage for more information about the monarch butterfly listing determination:  
<https://www.fws.gov/savethemonarch/>

Rights-of-Way as Habitat Working Group's webpage for more information about the Monarch CCAA:  
<http://rightofway.erc.uic.edu/national-monarch-ccaa/>

U.S. Fish & Wildlife Service's webpage for more information about the Monarch CCAA:  
<https://www.fws.gov/savethemonarch/ccaa.html>