**Monarch CCAA Comments Outline –**

Please send feedback on the outline to [stephanie.crawford@nreca.coop](mailto:stephanie.crawford@nreca.coop) by Tuesday, May 14 COB.

1. Intro – describe NRECA and explain NRECA’s interest in the monarch CCAA
2. Express support for voluntary conservation to benefit at-risk species
   1. Describe coops as good stewards of the land
   2. Highlight the impacts/cost imposed on coops from listing a species and resulting prohibitions; voluntary conservation in preferred alternative [please send examples if you would like them included – let us know if you wish to remain anonymous/identified]
   3. List other examples of coops implementing conservation (ex. coal mine reclamation?) [please send examples if you would like them included]
3. Express support for – and the coops role in – the cross-sector, nationwide collaboration to develop the monarch CCAA
   1. Describe unprecedented scale of CCAA – 48 states, 40 organizations from energy and transportation sectors
   2. The CCAA supports a nationwide strategy for monarch conservation that is necessary to support the monarch across its migratory path; an ‘all hands on deck’ approach is needed
   3. Coops can contribute in a significant way to monarch conservation – located in 47 states; own/operate 2.6 million miles, or 42 percent, of the nation’s distribution lines
   4. Highlight coop experiences to date in benefiting pollinators [please send project examples if you would like them included – let us know if you wish to remain anonymous/identified]
4. Express support for the regulatory certainty provided to coops by the monarch CCAA
   1. Highlight importance in continuing vegetation management practices (and other covered activities, such as maintaining and modernizing existing infrastructure) without delays – reduce wildfire risk, protect public safety, maintain reliability/prevent outages
   2. Provides certainty that creating monarch habitat today will not result in restrictions later on for that same habitat if the monarch is listed under ESA
   3. Support the operational flexibility given to coops to tailor their conservation measures to their specific circumstances – landscapes/climate/activities vary across the country – no one size fits all
   4. Support provision to allow for post-listing enrollment of lands that are added during the life of the agreement (or to remove or modify lands)
   5. Stress that coops do not control landowner actions on easements [Is this needed? Should we remain silent here?]
5. Request any changes to any of the covered activities, conservation measures, adoption rates, monitoring and tracking provisions?
   1. Are any of the activities or measures misstated?
   2. Are there any nomenclature issues we want to address or clarify?
6. Express support for the Categorical Exclusion for the CCAA under NEPA [Should we remain silent here?]
7. Express support for integrated CCAA/CCA but request clarifications
   1. Highlight importance to support streamlined Section 7 consultation on federal lands/projects
   2. Covered activities are activities already taking place to support existing infrastructure – impacts have already been accounted for
   3. Wish to avoid differing opinions across regional offices and contribute to project delays [please send examples of delays if you would like them included – let us know if you wish to remain anonymous/identified]
   4. Request clarification on whether federal permits for enrolled private lands would fall under purview of CCAA or CCA
   5. Request clarification for whether RUS borrowers fall under the purview of CCAA or CCA if conducting activities on private lands
8. Express support for consortium applications but request changes to language in the draft agreement’s description
   1. G&Ts do not “control” distribution coops; control only exists with respect to delivery of wholesale power
   2. Describe the relationship between the G&T and member distribution systems and the relationship between statewide organizations and member distribution systems
   3. Express support for consortiums to apply and share administrative responsibilities
   4. Provide examples of existing arrangements to highlight the benefits of this model to coops [please send project examples if you would like them included – let us know if you wish to remain anonymous/identified]
9. Express support for the lower administrative fee that UIC is proposing for “small contributors” (less than 500 “adopted acres”)
   1. All but three NRECA members are small businesses as defined by SBA
   2. Coop costs directly impact the consumer members
   3. Keeping costs low allows more dollars to be available for conservation on the ground
10. Other points to raise? Anything missing?