June 14, 2019

Submitted Electronically to Docket No.: FWS-R3-ES-2019-0007

Comments of Co-op Name

RE: **Receipt of Application for Enhancement of Survival Permit and Draft Candidate Conservation Agreement with Assurances/Candidate Conservation Agreement for Monarch Butterfly; University of Illinois at Chicago; Low-Effect Screening Form, 84 Fed. Reg. 15229 (April 15, 2019); Docket No. FWS-R3-ES-2019-0007**

Co-op Name is pleased to submit these comments in response to the U.S. Fish and Wildlife Service (FWS) Receipt of Application for an Enhancement of Survival Permit and Draft Candidate Conservation Agreement with Assurances/Candidate Conservation Agreement for the Monarch Butterfly from the University of Illinois at Chicago. 84 Fed. Reg. 15229 (April 15, 2019) Co-op Name is a member of the National Rural Electric Cooperative Association (NRECA),[[1]](#footnote-1) and these comments hereby incorporate by reference the comments submitted by NRECA.

The potential listing of the monarch butterfly under the Endangered Species Act (ESA) and the Draft Candidate Conservation Agreement with Assurances/Candidate Conservation Agreement for the Monarch Butterfly (CCAA/CCA) is of critical importance to the utility sector and rural electric cooperatives, which own and maintain 2.6 million miles or 42 percent of the nation’s electric distribution lines serving 56 percent of the nation’s landmass. Electric cooperatives have legal public service obligations to provide reliable electric service to their customers, and are incorporated as private entities in the states in which they reside.

If the draft integrated CCAA/CCA is approved by the FWS, co-op name will be eligible to apply for [or, intends to apply for] a Certificate of Inclusion to voluntarily conserve monarchs.

[Insert description of your co-op – including information such as:

* Confirmation that you are a small business as defined by the Small Business Administration (Note: all but three large G&Ts meet the definition). For example, Co-op is a private, independent electric utility, owned by its members. We are a small business (as defined by the Small Business Administration), and do not have investors to help defray the costs of regulations. The costs, instead, are borne directly by the farmers, ranchers, small businesses and other residents of our rural community who write a check each month to co-op to pay for their electric service.
* Number of consumer-members
* Size and location of your service territory
* Miles of powerline you maintain and connection/mile]

Co-op name operates within the range and migratory path of the monarch butterfly, and would be affected if it is listed under the ESA. This draft integrated CCAA/CCA gives us certainty that the conservation efforts we are already taking today and intend to enhance in the coming years can proceed without regulatory risk. Further, the flexibility given to cooperatives with Certificates of Inclusion in choosing the conservation measures and locations on their systems that are best suited for implementation gives us confidence that we can deliver monarch habitat in a cost-effective manner.

Regardless of whether the FWS chooses to protect the monarch butterfly through an endangered or threatened species listing, this draft CCAA/CCA makes sense for our cooperative. Co-op name is already implementing projects [or adapting land management practices] to benefit pollinators on our system. [Describe examples here (e.g., planting native plants, using Integrated Vegetation Management best practices, and other conservation measures to create and maintain monarch habitat)] We intend to continue this beneficial work regardless of whether the monarch butterfly is listed under the ESA.

Co-op name frequently undertakes projects, such as [utility line construction and maintenance, electric power generation] which can require federal authorizations and thus trigger Endangered Species Act (ESA) section 7 consultation and other ESA compliance requirements. Accordingly, co-op name has extensive experience with the ESA, including the section 7 consultation process, and believes this integrated CCAA/CCA gives our cooperative the certainty we need to move forward on implementing additional conservation for the monarch while ensuring that our projects advance in a timely and effective manner in compliance with the Act and its goals.

The national multi-sector partnership that developed the draft CCAA/CCA represents a significant investment to secure thriving populations of the monarch butterfly and other pollinators. We see the CCAA/CCA as the most cost-effective way for our cooperative to deliver additional monarch habitat on our system while focusing on our mission of delivering affordable, reliable power to our community. Co-op name encourages the FWS to support voluntary conservation by finalizing its approval of the draft CCAA/CCA as expeditiously as possible to provide certainty to our cooperative’s monarch habitat management plans. Please contact [name] at [email] or [phone] if you have any questions regarding these comments.

Sincerely,

[Signature of appropriate co-op representative]

1. The National Rural Electric Cooperative Association (NRECA) is the national service organization for America’s Electric Cooperatives. The nation’s member-owned, not-for-profit electric cooperatives constitute a unique sector of the electric utility industry – and face a unique set of challenges. NRECA represents the interests of the nation’s more than 900 rural electric utilities responsible for keeping the lights on for more than 42 million people across 47 states. From booming suburbs to remote rural communities, America’s electric cooperatives are energy providers and engines of economic development. Electric cooperatives play a vital role in transforming communities. [↑](#footnote-ref-1)