[Date]

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

Comments of [Company 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**

Company Name is pleased to submit these comments in response to the U.S. Fish and Wildlife Service’s (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)

Company Name is a member of the Advisory Team to the Candidate Conservation Agreement with Assurances (CCAA) Task Force, facilitated by the University of Illinois at Chicago’s Rights-of-Way as Habitat Working Group, and has contributed time and expertise to the development of the agreement. If the draft integrated CCAA/CCA is approved by the FWS, company name intends to apply for a Certificate of Inclusion to voluntarily conserve monarchs.

[Insert description of your company – including information such as:

* Number of customers served
* Size and location of your service territory
* Miles of powerline, road, or rail you maintain and connection/mile
* Acres of land or acres/MW solar you manage or maintain
* If applicable, confirmation that you are a small business as defined by the Small Business Administration]

Company name is pleased to contribute to this nationwide collaboration of organizations proactively providing habitat resources for the monarch butterfly throughout the continental United States. 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 companies with Certificates of Inclusion in choosing the conservation measures and locations on their system 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 company. Company 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.

Company name frequently undertakes projects, such as [utility line construction and maintenance, electric power generation, state highway or county road maintenance, railroad operation] which can require federal authorizations and thus trigger Endangered Species Act (ESA) section 7 consultation and other ESA compliance requirements. Accordingly, company name has extensive experience with the ESA, including the section 7 consultation process, and believes this integrated CCAA/CCA gives our company 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.

This national multi-sector partnership represents a significant interest and investment to secure thriving populations of the monarch butterfly and other pollinators. Company 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 company’s monarch habitat management plans. Please contact [name] at [email] or [phone] if you have any questions regarding these comments.

Sincerely,

[Signature of appropriate company representative]