## When to Enroll?

Timing of Enrollment	Benefits	Constraints
Pre-listing decision ( <i>before</i> Dec 15, 2020)	<ul> <li>Enrollment targets may contribute to listing decision.</li> <li>Allows maximum time for adaptation to CCAA implementation.</li> <li>Recognition as early actor / industry leader.</li> </ul>	<ul> <li>Low risk.</li> <li>Effort to meet CCAA implementation requirements, although voluntary commitment and can un-enroll at any time.</li> </ul>
Post-draft ruling <u>to list</u> ( <i>after</i> Dec 15, 2020)	<ul> <li>Certainty and assurances in face of listing restrictions and challenges.</li> <li>Enrollment soon after decision allows time to adapt to CCAA implementation requirements prior to listing.</li> </ul>	<ul> <li>Low to moderate risk.</li> <li>Potentially less time to adapt to CCAA implementation requirements.</li> <li>Compressed time for training and piloting internal CCAA program.</li> </ul>
Post-draft ruling <u>to not</u> <u>list</u> ( <i>after</i> Dec 15, 2020)	<ul> <li>Certainty and assurances in face of challenges to the listing decision.</li> <li>Potentially minimizes risk and potential costs/delays from a reverse listing decision.</li> </ul>	<ul> <li>Low to moderate risk.</li> <li>Effort to meet CCAA implementation requirements, although voluntary commitment and can un-enroll at any time.</li> </ul>
Post-final ruling <u>to list</u> ( <i>after</i> Dec 15, 2021, if applicable)	<ul> <li>Certainty and assurances in face of listing restrictions and challenges.</li> </ul>	<ul> <li>High risk. <u>Enrollment in CCAA is not</u> <u>allowed after the Effective Listing date</u>.</li> <li>Potential gap in incidental take coverage after Effective Listing date and prior to Certificate of Inclusion issued.</li> </ul>

## **Enrollment Strategies**

- > All-in: Enroll all or majority of lands you want coverage for and meet adopted acres target in Year 1
- > Ramp-up: Enroll all or majority of lands you want coverage for, then define a 5-year ramp-up schedule to meet your adopted acres target
  - Provides greatest incidental take coverage
  - Stronger commitment to inform final listing decision
- Some now, more later: Enroll a portion of your system now, then modify Certificate of Inclusion at any point in the future to include additional lands
  - Provides opportunity to pilot implementation on smaller scale
  - Greater flexibility to adapt implementation over time



