



# The Nationwide Monarch CCAA for Energy and Transportation Lands An Update

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## What is a CCAA?

- > Candidate Conservation Agreement with Assurances (CCAA):
  - Are voluntary agreements
  - Address concerns for species that may be listed in the future
  - Must provide net conservation benefit
  - Address all key "manageable" threats under the owners' control
  - Give assurances that USFWS will not request additional conservation measures or restrictions if the species is listed









## **CCAA Advisory Team**













**CIOWADOT** 

























C Cardno







Generation.



**MaineDOT** 























CYPRESS CREEK RENEWABLES





U.S. Department of Transportation

Federal Railroad Administration

















## Innovative Model for Conservation

- The first nationwide CCAA
- Supported by 40+ industry partners
- Values cross-sector collaboration
- Completed on the fastest timeline of any such agreement









## **CCAA Goal and Conservation Potential**

- > The goal of this CCAA is to encourage participation in voluntary conservation on energy and transportation lands that results in a net benefit to monarchs.
- > The conservation potential of the Agreement aspires to the enrollment of up to 26 million acres of energy and transportation lands contributing over 300 million stems of milkweed, and 2.3 million acres of monarch foraging habitat, over the coming decades.



Ryan Hagerty, USFWS





## How Does this Work?



## How Does This Process Work?

## Authorization of CCAA

- USFWS authorizes the agreement and issues an EOS Permit.
- The Programmatic Administrator agrees to uphold the agreement and permit compliance requirements.

#### Certificate of Inclusion Enrollment

- The Programmatic Administrator enrolls partners into the agreement terms via Certificates of Inclusion.
- Partners adopt voluntary conservation measures, compliance tracking, and monitoring required to fulfill the agreement terms.

#### **Implementation**

- Partners implement conservation measures and conduct tracking and effectiveness monitoring.
- Partners annually report compliance to the Programmatic Administrator.

#### Reporting

- The Programmatic Administrator gathers and cumulatively reports on agreement compliance to USFWS.
- USFWS verifies compliance and discusses any needs with Programmatic Administrator.







## What's Required?

- > Enroll lands in the Agreement
  - Owned
  - Leased
  - Easements

- > Commit to:
  - Implementing conservation measures
  - Track where implemented
  - Monitor and report effectiveness
  - Support the Program Administrator

## **Enrolled Lands**

(Where coverage is desired)

## **Adopted Acres**

(Amount required for conservation)

Monitored Areas

(Verify habitat)





## What Conservation Measures are Expected?

- Select conservation measures that address key threats to suitable habitat on your system:
  - Threat 1. General loss of habitat
  - Threat 2. Loss of habitat through herbicide use
  - Threat 3. Loss of habitat through mowing

#### **Conservation Measure**

Seeding and planting to restore or create habitat

**Conservation mowing to enhance floral resource habitat** 

**Targeted herbicide treatments** 

Prescribed burning to promote suitable habitat

**Controlled grazing to promote suitable habitat** 

Brush removal to promote suitable habitat

Suitable habitat set-asides (temporary or permanent)







## Adopted Acres – What's Required?

Adoption Rate Approach	Transmission	Distribution	Generation	Highways (Interstate, U.S., State)	Highways (County, Local)	Rail	
CCAA/CCA Adoption Rates	18%	1%	9%	8%	5%	5%	

#### > Company applies:

- Enrolls 100,000 acres of transportation lands.
- Of this 100,000 acres,
  - 40,000 acres are Interstate/State highways
  - 60,000 acres are County/Local roads

- @ 8% = 3,200 acres
- @ 5% = 3,000 acres
- Total combined adopted acres includes = 6,200 acres







## What Activities are Covered by Assurances?

Covered Activity	Examples
General Operations	Vehicle operation, maintenance of access routes, installation and maintenance of construction routes and temporary matting.
Survey and Inspections	Routine line inspection (aerial and ground patrols), surveying and staking, exploratory soil boring
Vegetation Management as part of Conservation Measures	Vegetation management activities conducted as part of conservation measure implementation. See list of conservation measures for descriptions.
Vegetation Management that may Impact Habitat	Vegetation management activities <u>not</u> conducted as part of conservation measure implementation. These activities are associated with routine vegetation management actions that may include mowing during the growing season, broadcast herbicide use, and other vegetation management not directly tied to conservation.
Minor Structural Maintenance	Guy wire replacement, culvert replacement, pole wrapping or painting, structural testing and treatments, structural replacements (insulators, bolts, braces, clamps, grounding wires, and other hardware).
Facilities Management and Maintenance	Routine vegetation maintenance of developed lands. General facilities building and maintenance within developed areas.
Construction within Existing ROW	Construction and ground disturbance in existing ROW.
Emergency Response Activities	Unplanned access and work activities within suitable habitat to resolve emergency response and outage repair needs.





## Administrative Fees



#### Administrative Fee

- Administrative Fee is required to support the CCAA Program
  - Paid to UIC during the initial application, then on an annual basis thereafter
  - Multi-year "pay ahead" option
- Fee is structured on a sliding scale to consider:
  - Viability of UIC program costs,
  - Maximizing conservation benefit,
  - Acknowledging Partner-specific cost and incentive considerations,
  - Encouraging enrollment from small and large Partners alike.









## How is it Calculated?

#### > Example Partner without deductions

Year	Partner Name	Adopted Acres	Application and	Base Fee	Adjusted	Calculated Fee	Calculated	Adopted	Supplemental	Early	Calculated	Calculated	Administrative
Enrolled		Target	Modification Fee		Cost Per Acre	(raw)	Fee	Acres	Measures	Enrollment	Deduction	Deduction	Fee
							(within	Exceeded	Contributions		(% reduction)	(dollars)	
							constraints)	Target					
1	Partner Name	5,795	\$ 3,000.00	\$ 5,000.00	\$ 2.00	\$ 19,590.00	\$ 19,590		0.0%	0.0%	0.0%	\$ -	\$ 19,590
2	Partner Name	5,795		\$ 5,000.00	\$ 2.00	\$ 16,590.00	\$ 16,590	0.0%	0.0%	0.0%	0.0%	\$ -	\$ 16,590
3	Partner Name	5,795		\$ 5,000.00	\$ 2.00	\$ 16,590.00	\$ 16,590	0.0%	0.0%	0.0%	0.0%	\$ -	\$ 16,590

## > Example Partner with maximum deductions in 3<sup>rd</sup> year

Year	Partner Name	Adopted Acres	Application and	Base Fee	Adjusted	Calculated Fee	Calculated	Adopted	Supplemental	Early	Calculated	Calculated	Administrative
Enrolled		Target	Modification Fee		Cost Per Acre	(raw)	Fee	Acres	Measures	Enrollment	Deduction	Deduction	Fee
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2	Partner Name	5,795		\$ 5,000.00	\$ 2.00	\$ 16,590.00	\$ 16,590	0.0%	0.0%	0.0%	0.0%	\$ -	\$ 16,590
3	Partner Name	5,795		\$ 5,000.00	\$ 2.00	\$ 16,590.00	\$ 16,590	20.0%	10.0%	0.0%	30.0%	\$ (4,977.00)	\$ 11,613





## What does the Administration Fee Support?

- > Program administration
  - Application review / Certificate of Inclusion (COI) management
  - Review and Partner annual reports
  - Prepare and submit the comprehensive annual report to USFWS
  - Annually process COI modifications
  - Adaptive management / non-compliance reviews
  - Meetings with partners and USFWS
  - Facilitate the Advisory Committee
  - General communications with enrolled partners
  - Outreach and education with potential applicants
  - Maintain resource website / Monarch CCAA Toolbox









## What does the Administration Fee Support?

- > Added support (as funding allows)
  - Develop and update training materials
  - Provide technical assistance (e.g., application support, monitoring, implementation guidance, communications tools, etc.)
  - Ongoing geodatabase management and GIS analysis tools
  - Support ongoing Rights-of-Way as Habitat Working Group (workshops, webinars, task forces, etc.)
  - Amendment or modification of the CCAA with added ESA regulatory strategy development (other listed or at-risk species)
  - Seed grants to encourage participation and/or support conservation actions
  - Student internship program (e.g., monitoring or other research)
  - Partner recognition and public outreach to build awareness and support







## Why Participate?



## So What Happens After June?

#### If decision is:

> To list as Threatened or Endangered

> "Not Warranted, Precluded"

> To list as "Warranted, But Precluded"

## **CCAA** brings value through:

> Regulatory assurance and incidental take coverage

> Certainty amidst potential challenges; possibility to contribute to (or preclude the need for) future listing decisions

> Certainty and consistency; likely considered in future listing decisions (to avoid listing as Threatened or Endangered)







## What would be considered "take" for Monarchs?

> USFWS is currently completing their Conference Opinion and incidental take assessment on the Monarch CCAA.

- > Final determination will be made by the USFWS during final review and authorization of the CCAA.
- > Based on preliminary coordination, potential take is likely focused on impacts to individual butterflies and milkweeds (required breeding habitat).









## The Costs and Benefits of Enrollment (If Monarchs are not Listed)



#### Costs

- Administrative and Legal Costs
- Implementation Costs
- Annual Reporting
- Compliance Tracking
- Effectiveness Monitoring

#### **Benefits**

- 3<sup>rd</sup> Party Administration and Reporting
- Reduced Implementation Costs
- Benefits from Future Adaptation
- Technical Support
- USFWS Coordination
- Cost Reduction from Regulatory Assurances



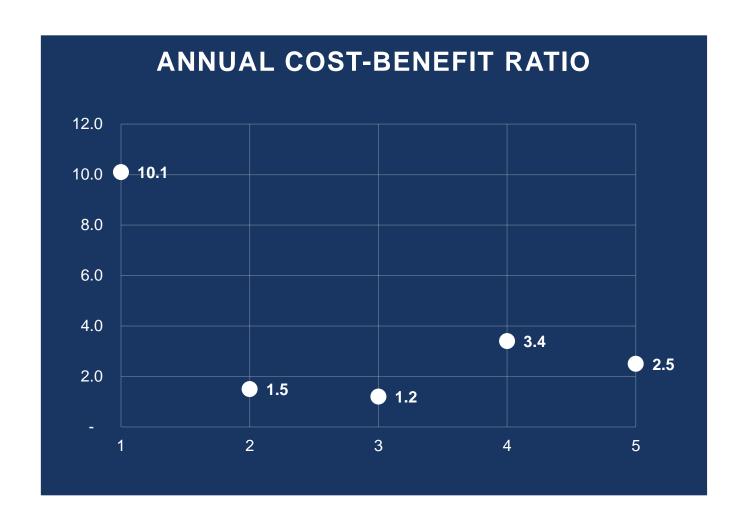




## Initial Review – Cost-Benefit Ratio (If Monarchs are not Listed)

 Cost-Benefit Ratio ranges from 1.2 to 10.1 (value returned for costs expended)

- > Results vary by:
  - Size of system
  - Change in management practices
  - Value in certainty
  - Confidence in valuation (assertive vs. conservative assessments)





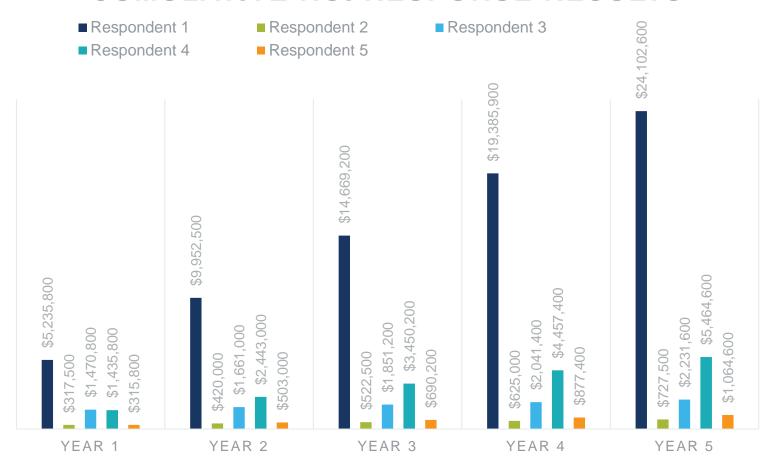




## Results – Cumulative Return Over 5 Years

- Considers an "If Monarchs are Not Listed" scenario.
- > Cumulative return (over 5 years) ranges from \$700,000 to >\$24M.
- Results based on initial assessments completed by 5 participants.

#### **CUMULATIVE ROI RESPONSE RESULTS**









## What's Next?



## **Looking Ahead**



- > Public Comment Period (April 15 June 14)
  - Full agreement is available in the <u>Federal Register</u> and at <a href="https://www.fws.gov/savethemonarch/CCAA.html">https://www.fws.gov/savethemonarch/CCAA.html</a>



> Final CCAA (mid-June)



> Monarch Listing Decision (June 30)



- > Enrollment and Implementation
  - Early enrollment incentives: 5 20% discounts if you apply before the end of 2019







## How to Get Involved?

- Find more information here: <a href="http://rightofway.erc.uic.edu/">http://rightofway.erc.uic.edu/</a> (Check out Monarch CCAA page and CCAA Task Force under Working Group Access)
  - FAQs
  - Talking Points
  - Cost-Benefit Analysis
- Provide input during the public comment period!
- Stay in the loop through the Rights-of-Way as Habitat Working Group: <a href="http://www.erc.uic.edu/news-events/">http://www.erc.uic.edu/news-events/</a>



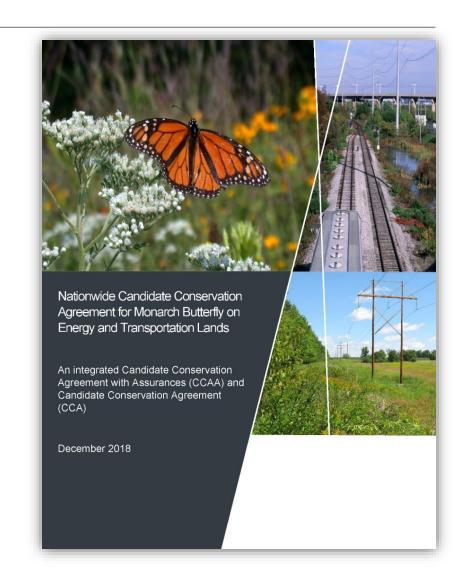






#### How to Enroll?

- > Review the CCAA
- > Assess your system
- > Set up a pre-application call with UIC to discuss
  - application process,
  - compliance expectations, and
  - Additional Q&A
- > Prepare application









## Outreach to Interested Participants

- > Upcoming "How to Enroll" webinars (May 14 and 16)
  - CCAA requirements
  - Application process
  - Administrative fees
  - Implementation needs
  - Benefits to participation
- > Help spread the word!
- > Recordings will be posted to the Monarch CCAA webpage



## The Monarch CCAA: What You Need to Know and How to Enroll

The Monarch CCAA is expected to be finalized in June and open for enrollment immediately thereafter. Tune in to the upcoming webinar to learn more about this conservation opportunity and how your organization can participate.







## Questions?

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