

Written Testimony of Justin Jahnz

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Thank you, Chairman Huffman, Ranking Member Bentz and members of the Subcommittee for the opportunity to be here to share our efforts to help promote Monarch butterfly conservation in rural Minnesota.

My name is Justin Jahnz and I am the CEO at East Central Energy (ECE), headquartered in Braham, Minnesota. ECE is a not-for-profit rural electric cooperative that serves nearly 63,000 member-consumers. ECE manages over 8,000 miles of distribution power lines, which include rights-of-way and acreage around substations.

ECE is one of about 900 electric cooperatives (co-ops) serving electricity to approximately 42 million people in 48 states covering 56% of America's landmass. We are governed by elected boards of directors. Co-ops serve some of the poorest, most rural parts of our country with an average of just 10 customers per mile of line. That's far fewer than other types of electric utilities. Despite these challenges, co-ops strive to be forward-thinking and evolutionary to address a multitude of energy industry challenges and meet member expectations. It is this commitment to community that pushes ECE to expand its commitment to environmental stewardship.

In the early 2000s, ECE began developing a utility vegetation management plan that had a heavy emphasis on ecosystem ecology and sound arboricultural practices. We knew intuitively that creating an ecosystem of compatible plants would provide many benefits including maintenance cost (present and future), as well as ecological diversity, and quality wildlife habitat. After several years of implementation, we began to realize the benefits of the program in all areas.

ECE continues to use an Integrated Vegetation Management (IVM) program, which is generally defined as the practice of promoting desirable, stable, low-growing plant communities that will resist invasion by tall growing tree species through the use of appropriate, environmentally sound, and cost-effective control methods. These methods can include a combination of chemical, biological, cultural, mechanical, and/or manual treatments. When a compatible ecosystem is established, the non-target plants become assets that prevent invasion by undesirable species. This ecological diversity is also extremely beneficial to many wildlife species.

In 2018, Alicia Kroll, an employee from ECE's billing department with a background in zoology, came to the environmental committee and proposed the idea of a "monarch waystation" project on ECE property. The committee members discussed the idea and decided to explore some options and expand the scope. Eventually the decision was made by the executive team and board of directors to set

aside two 2-acre plots for pollinator habitat creation. Around this time, an innovative, multi-state, multi-industry Candidate Conservation Agreement with Assurances (CCA) for the Monarch butterfly was being promoted within the Rights-of-Way as Habitat Working Group at the University of Illinois Chicago.

As we explored more, we learned that the CCA was a roadmap for energy and transportation land managers to reduce or potentially remove key threats to the Monarch butterfly that occur on rights-of-ways. By implementing conservation measures, such as targeted herbicide applications, brush removal, planting and seeding native vegetation, and providing idle land set-asides, it is projected that total enrolled acres could contribute over 300 million stems of milkweed over the coming decades.

ECE was involved with our national trade association, NRECA, in advising the CCA program authors to write the agreement in a way that the terms could be achievable by a rural cooperative and not cost-prohibitive. Even though the decision to list the Monarch butterfly under the Endangered Species Act had not yet been made at the time, ECE applied and enrolled as a participant anyway in the spring of last year. Habitat set-aside areas were one of the final pieces that would qualify ECE for the terms of the agreement. The hope was that we could help show the benefit of voluntary participation in the program and encourage our fellow cooperatives to join the effort.

After hearing about this program, ECE's substation manager mentioned the recent reconstruction of one of our substations. The topsoil had just been spread but not seeded for turf grass. He asked if we'd like to do a pilot project for installing pollinator habitat there instead of manicured lawn. We jumped at the chance and today the project is flourishing. Moving forward, we hope to use this as a template for projects at our some of our other 35 distribution substations.

All of our hard work paid off. ECE was the first rural electric cooperative in the nation to receive a Certificate of Inclusion into the Monarch CCA. Today the habitat at our headquarters is about two years old. We have some walking trails around the perimeter and the area is enjoyed by employees on their breaks. Our next steps will be sitting areas, ID tags for unique species, and signage for public awareness. We have published videos on how to identify the native plants using the Seek app by iNaturalist and plan to have seed collection days for employees to start their own habitat projects at home. The area will also serve to be an accurate demonstration of the type of ecosystem we are trying to achieve on our 25,000 acres of land—including over 5,000 miles of maintained right of way—property that belongs to our members.

The benefit to enrolling in the CCA is that it puts individual cooperatives in the drivers' seats of their operations. By moving toward a future that considers right-of-way management as pollinator habitat management, collectively, we can provide quality habitat to reduce the need for the Monarch to be listed as an endangered species. In return for using best management practices, the CCA provides regulatory certainties and maximizes operational flexibility for ongoing management activities in the event of listing.

While some advocates have asked for immediate, emergency protections for the Monarch under the Endangered Species Act, ECE believes the consequences would be devastating because it would shut off enrollment in the collaborative CCA. Our goal is to protect this iconic species for posterity. If more entities were to enroll in the CCA, we are hopeful that we can recover the Monarch population and

avoid a listing decision in the future. Within the past year, 27 additional organizations enrolled in the CCAA, which equates to about 780,000 habitat acres.

The success of the Monarch butterfly relies heavily on the way all lands are managed. Instituting a cohesive plan will accomplish more than enforcement through restrictive regulations. Regulations would hinder cooperation and cause undue harm to time tested, science-based, proven protocols for promoting beneficial vegetation along utility rights-of-ways. Collaboration is key; restrictions are not.

ECE believes that through collaboration, education, and awareness, electric cooperatives can begin to focus on a future where pollinator habitat is synonymous with utility vegetation management. In that future, healthy ecosystems can exist under every power line, and work as nature intended while also providing safe and reliable electricity and protecting the bottom line.

Thank you for the opportunity to testify here today. I am happy to answer any of your questions.

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