

Peer Review Plan: Species Status Assessment Report for the Regal Fritillary (*Argynnis (Speyeria) idalia*): Eastern Subspecies (*Argynnis idalia idalia*) and Western Subspecies (*A. i. occidentalis*)

Timeline of the Peer review (estimated):

Draft documents to be disseminated: April 2023

Peer review to be initiated: February 2023

Peer review to be completed by: May 2023

Determination regarding species' status expected: This report will inform a listing decision by the U.S. Fish and Wildlife Service (Service) under the Endangered Species Act (Act). This review is expected to be completed in Fiscal Year 2023.

About the Peer Review Process:

In accordance with our July 1, 1994, peer review policy (59 FR 34270), the Service's August 22, 2016, Director's Memo on the Peer Review Process, and the Office of Management and Budget's December 16, 2004, Final Information Quality Bulletin for Peer Review, we will solicit independent scientific reviews of the information contained in our Species Status Assessment (SSA) report for the eastern and western subspecies of regal fritillary.

The U.S. Fish and Wildlife Service (Service) will request peer review from three or more independent experts. We will consider the following criteria.

- **Expertise:** The reviewer should have knowledge of or experience with the species, the subspecies, or similar species biology.
- **Independence:** The reviewer should not be employed by the Service. Academic, consulting or government scientists should have sufficient independence from the Service if the government supports their work.
- **Objectivity:** The reviewer should be recognized by his or her peers as being objective, open-minded, and thoughtful. In addition, the reviewer should be comfortable sharing his or her knowledge and perspectives and openly identifying his or her knowledge gaps.
- **Conflict of Interest:** The reviewer should not have any financial or other interest that conflicts or that could impair his or her objectivity or create an unfair competitive advantage. If an otherwise qualified reviewer has an unavoidable conflict of interest, the Service may publicly disclose the conflict.

While expertise is the primary consideration, the Service will select peer reviewers (considering, but not limited to, these selections) that add to a diversity of scientific perspectives relevant to the SSA report for the eastern and western subspecies of the regal fritillary. We will not be providing financial compensation to peer reviewers. We will solicit reviews from at least three qualified experts.

The Service will provide each peer reviewer with information explaining their role and instructions for fulfilling that role, the SSA report, and a list of citations as necessary. The purpose of seeking independent peer review is to ensure use of the best scientific and commercial information available and to ensure and to maximize the quality, objectivity, utility, and integrity of the information upon which the report is based, as well as to ensure that reviews by recognized experts are incorporated into the SSA process. Peer reviewers will be advised that they are not to provide advice on policy. Rather, they should focus their review on identifying and characterizing scientific uncertainties. Peer reviewers will be asked to answer questions pertaining to the logic of our assumptions, arguments, and conclusions and to provide any other relevant comments, criticisms, or thoughts. Specific questions put to the reviewers include the following:

1. Is our description and analysis of the subspecies' needs, biology, habitat, population trends, and historical and current distribution of the subspecies accurate?
2. Does the SSA report provide accurate and adequate review and analysis of the current and projected future condition of the subspecies?
3. Are our assumptions and definitions of suitable habitat logical and adequate?
4. Are there any significant oversights, omissions, or inconsistencies in our SSA report?
5. Are the conclusions we reach logical and supported by the evidence we provide?
6. Did we include all the necessary and pertinent literature to support our assumptions, arguments, and conclusions?

Peer reviewers will provide individual, written responses to the Service using our Peer Review Portal. Peer reviewers will be advised that their reviews, including their names and affiliations, will: (1) be included in the decisional record of our determinations regarding the subspecies' status (i.e., final rules or withdrawals); and, (2) be available to the public upon request once all reviews are completed. We will summarize and respond to the issues raised by the peer reviewers in the record supporting our determinations.

About Public Participation

The peer review process will be initiated shortly. We strongly encourage that public comments on the approach of this peer review be submitted as soon as possible in order to allow enough time for processing and consideration. However, we will accept comments on the peer review plan throughout the SSA process.

Contact

For more information, contact Craig Hansen, Regional Recovery Coordinator, by telephone to 303-236-4749 or by email to craig_hansen@fws.gov.

Page	Chapter	Line Number	Comment	Created By	Reviewer Email	Review Type
07	1	1	Figure ES.2. there should certainly be a connection from climate change to fire.	Marcus Kronforst	mkronforst@uchicago.edu	Peer Review
101	Grazing		<p>This section needs to be expanded to talk more about the deleterious effects of overgrazing and fire. In Nebraska, the three greatest threats to regal fritillary populations are 1) drought, 2) overgrazing, and 3) brome grass invasion. NGPC has allowed overgrazing on many of their properties in southern Nebraska, and regals have essentially disappeared. Neil Dankert (personal communication) had this to say about NGPC and overgrazing: "Prairie Knoll WMA was once great- butterfly milkweed and regals everywhere; great Lepidoptera diversity. Once they put a fence up and allowed overgrazing, a year or two later there was not a recognizable plant in site; it was literally grazed to the ground. A year or two later the prairie quality was way down, along with Lep numbers. Osage WMA (plot closest to Tecumseh, NE) used to be quite good. Visited a few years later, and it was all weeds and Queen Anne's lace (from overgrazing). Rowe Sanctuary near Grand Island is the classic example of grazing ruining habitat. Regals used to be there by the hundreds, and now you are lucky to see a half dozen." Probably the classic example of overgrazing comes from the Sheyenne National Grassland in SE North Dakota. Dakota skippers and Poweshiek skipperlings used to be common there, but have not been seen since 2003. Likewise, nectar sources like purple coneflower have also disappeared from the Sheyenne. I would add that overgrazing has been a problem for other endangered insects, e.g. the Salt Creek tiger beetle. However, light grazing does not seem to alter the ecosystem dramatically. Fire has been blamed on the disappearance of the Dakota skipper and Poweshiek skipperling at Caylor Prairie in Iowa. While fire can promote the profusion of flowers for nectar, ill-timed fire can kill larvae.. Therefore, patch burning is recommended.</p>	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
104	Reintroduction efforts		<p>In the early 1980s, I participated in a several year study to reintroduce the Regal fritillary in Maryland. Live larvae and live adult females from NE were sent and released. However, no subsequent adults were seen at any of the release sites, either the year or subsequent years. One has to ask the question "why did they disappear from the site in the first place?" Was it habitat alteration or some other reason? It seems logical that reintroduction efforts would not be successful until those questions are answered and addressed.</p>	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
105	4	3	<p>Captive breeding and reintroduction of insects have received a lot of attention with regard to monarch butterflies where it is generally frowned upon by the scientific community. There are many downsides. Potential downsides could be explored a bit in this text.</p>	Marcus Kronforst	mkronforst@uchicago.edu	Peer Review

PEER REVIEWER COMMENTS FROM PORTAL

108	20-21	Here is the reference for the reintroduction of regal fritillary butterflies accomplished at Neal Smith National Wildlife Refuge in IA: Shepherd, S. and D.M. Debinski. 2005. Reintroduction of Regal Fritillary (<i>Speyeria idalia</i>) to a restored prairie. <i>Ecological Restoration</i> 23(4):243-249.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
108	28-31	Good summary point.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
115	Table 13	Disagree with assessment of western corn belt plains. Regal fritillary stronghold is in southeast NE, not in the Sandhills.	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
12	18-28	Why are there no options for improving conditions in the 3 scenarios? If there was significant prairie restoration, including host plants at a large scale, there could be a more positive potential scenario. Yes, it would be costly, but it is a feasible option that I would argue should be considered. Some habitats are impossible to restore, but tallgrass prairie can be effectively restored, and with the required nectar and hostplants.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
126	7, 20	I don't think I saw a justification for using RCP4.5. Some might argue that this is a relatively mild set of climatic changes, as compared to 6.0 or 8.5.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
140	Table 21	Hyannis is misspelled	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
17	17	I'm guessing that "not very low" should probably be "very low".	Debinski, Diane	diane.debinski@montana.edu	Peer Review
179	37-38	Please add scientific names for violet species.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
18	1-8	I agree with this assessment.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
181	adults	Comment: Females are a more reddish orange compared to the orange of males	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
181	flight period	Comment: Males in southeast Nebraska emerge about 20 June. My earliest observance in 40 years was 31 May. Lates observance of females was about 20 September.	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
184	21	eggs is misspelled	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
184	Sex ratios	I question the 50:50 ratio of males to females, even after female emergence in early July. I see at least 10 males to 1 female, sometimes 20 or more males to 1 female. Even into September, I see as many males as females. I have reared Regal fritillaries in a controlled environment perhaps 20-30 times over the years, and only once have I produced more females than males. I'm not convinced that the ratio is 50:50 even though it should be.	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
187	20/21	Unsure if this is true. I have seen North Dakota adults as large as any Nebraska adults. However, I have also noted that some Nebraska Sandhills adults are smaller, perhaps due to environmental stresses or violet quality. I believe that microhabitat plays a more important role in determining size than does location.	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
25	14-19	I like the summary of the concept of viability here.	Debinski, Diane	diane.debinski@montana.edu	Peer Review

32		9-12	I agree with this statement. However, it might be valuable to mention that there are some larger restored tallgrass prairies in the Midwest, such as the Neal Smith National Wildlife Refuge in Iowa and areas owned by the Nature Conservancy in Missouri near the Pawnee Prairie. Such restored areas are nowhere near as valuable to Regal Fritillaries as are the native tallgrass prairies. However, they are located near native prairie remnants and given that in some cases (Neal Smith) they are planted with prairie violets and nectar plants, they may provide some valuable habitat and contribute to connectivity.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
34	1	7	Mention of genetic structure here requires a citation.	Marcus Kronforst	mkronforst@uchicago.edu	Peer Review
38-39		46-6	Land cover classification based on remotely sensed data (as is NLCD) will undoubtedly overestimate native prairie cover. I am not aware of any publications that show how native vs. restored prairie has been differentiated by remotely sensed data. Although it may be possible, it would require intense analysis of temporal and spatial data. As such, in many regions, particularly the Midwest, a grassland categorization of landcover will be highly skewed towards restored prairie or grasslands dominated by non-native species. In other regions where there has been less tilling of the land, this may be less of an issue. So the statement "likely overestimates" might be more accurately stated "undoubtedly overestimates". I was glad to see in Appendix I that additional information was included in some cases to refine grassland categorization, although it is not clear what percent of the grasslands for which this was possible.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
39		7	Dispersal will likely be context (landscape) specific which contributes to the difficulty in making one simple statement about connectivity. For example, two prairies close together may have low connectivity if separated by a forest, while two prairies far apart may have higher connectivity if separated by a large grassland.	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
40		29	Figure placement on page needs correcting.	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
40-83			Nice job describing the natural history of the species (Ch. 2-3). Well referenced.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
41	Table 2		idalia should not be capitalized. You also should include the author (describer): idalia (Drury, 1793), occidentalis (Williams, 2002)	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
41	2	20	Species name in the table should not be capitalized (I think).	Marcus Kronforst	mkronforst@uchicago.edu	Peer Review
42		21	Include caption on same page as figure	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
44	2	1	Insect natural history documented here is excellent and very complete.	Marcus Kronforst	mkronforst@uchicago.edu	Peer Review
44		8	Larvae hatch out of eggs (eggs don't hatch into larvae)	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review

PEER REVIEWER COMMENTS FROM PORTAL

44		30	Regal adults have been observed in late May in Missouri, including in 2023. This is also stated in line 34.	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
49		13	Wouldn't two or more colonies be sufficient to elevate to the next level (population)?	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
5		25	Delete "most males dies soon after mating," and replace with "males are shorter-lived than females," I have often seen males flying with females in September, although they are quite worn.	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
50		35	My graduate student conducted surveys for regals in North Dakota and had spent some time in Montana, seeing several individuals. Never more than a few here and there but does not give the impression of a single stray. These would be in 2020 or later years. Maybe another line of evidence suggesting a northern movement of the butterfly.	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
51	2	30	Page 28 says 18 states but here it says 15 states.	Marcus Kronforst	mkronforst@uchicago.edu	Peer Review
52		8	Wording is awkward. Switch "historical than" to "than historical"?	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
58	2	27	haplotype referred to here is presumably mitochondrial haplotype	Marcus Kronforst	mkronforst@uchicago.edu	Peer Review
59	2	5	Rutins et al. 2022 reference is not in Literature Cited	Marcus Kronforst	mkronforst@uchicago.edu	Peer Review
64		1	In Fig. 19, I would suggest an arrow from precipitation to the box with vegetation as not all habitat would be classified as riparian or wetland.	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
67		7	I would have to go back into the literature to see if fire was is a confounded variable. Time since fire and depth of litter are likely highly correlated, especially in areas with regular fire return. It could be that it takes some time for populations to recover following fire, but litter depth also increases over this time.	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
69		6	Both larvae and adults need enough moisture to support the plants (violets and floral resources) they both require. Considering the wide historic range, there are many different habitat types with different *absolute* moisture levels. I would argue it is the *relative* that is most important. This difference will be more pronounced with climate change and extreme precipitation patterns.	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
7			Letter abbreviations in green bubbles are not defined, nor is AU in red bubbles	Debinski, Diane	diane.debinski@montana.edu	Peer Review
70		4-20	Good idea to provide heat sensitivity information for the monarch butterfly as a comparison.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
70	3	4	I question how applicable D. plexippus thermal tolerance information is here. It is possible that this is a good reflection of thermal tolerance for Argynnis idalia but it may not be.	Marcus Kronforst	mkronforst@uchicago.edu	Peer Review
70		39	This mentioned removing excess thatch but earlier (page 67, line 7) there was talk about a positive correlation with regals).	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review

75		Table 8	Nice summary of existing data on patch size effects. It might be worth noting that the maximum native prairie patch size in Midwestern prairies are much smaller than in some of the western grasslands. So there were fewer opportunities to compare population responses of Regal Fritillary butterflies in hundreds of acres to thousands of acres of native prairie in these more fragmented landscapes.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
78			Figure 20 is truncated on page, so not sure if I saw all components. It appears that Fig. 21 is similar, but please check.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
84		35-40	There are some large-scale prairie restorations within the range of the Regal Fritillary where cropland has been converted to restored prairie, and in some cases with violets planted. It would be worthwhile to include how these positive habitat changes could affect the species.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
84	4	1	Descriptions of stressors is very complete.	Marcus Kronforst	mkronforst@uchicago.edu	Peer Review
88		4	Please check spelling of Debinski on "Ries and Debinski". I think I saw that in more than one place (pg. 178, etc.). I am not adding many grammatical comments, but could not resist this one.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
89		6-27	Another good reference would be: Recent land use change in the Western Corn Belt threatens grasslands and wetlands C. K. Wright and M. C. Wimberly, Proceedings of the National Academy of Sciences 2013 Vol. 110 Issue 10 Pages 4134-4139 DOI: doi:10.1073/pnas.1215404110	Debinski, Diane	diane.debinski@montana.edu	Peer Review
89		24	Based on the previous section on nectar sources, and my experience, highlighting milkweeds over other species is not warranted. Appears that regals are relative generalists or opportunistic in terms of nectar sources. More appropriate for a monarch report.	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
91		35	Degradation due to grazing or potentially haying would not change the amount of grasslands but would reduce the amount of suitable habitat. This deserves more attention. Unfortunately, results from a study in MO won't be available for another year or two, but should be able to address habitat degradation. In central MO there are a lot of grasslands that are apparently unused by regals.	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
92		4-5	From my experience, biologists do not generally define herbicides as a type of pesticide. Pesticides kill insects, fungi, and animals, whereas herbicides kill plants. I do see that Wikipedia clumps the two, but I would not clump these as one group.	Debinski, Diane	diane.debinski@montana.edu	Peer Review
93	Herbicides	11	comment: 2, 4, D is not very effective against violets. Multiple doses are necessary to even show an effect.	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
95	Invasive grasses	42	Smooth brome has encroached on many native prairie tracts managed by NGPC in southeast Nebraska. Smooth brom not only chokes out native grasses, but shrubs and flowers. It is extremely hard to control.	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
95		32	Further to the south, fescue can be an issue and exclude native plants.	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review

95-96			Tall fescue is also a significant issue in the Midwest. It is planted into grasslands as forage for cattle because it greens up early in the spring. However, it can form dense monocultural stands and changes the burning regimes and litter biomass. This example could be incorporated into the stressor table under section I) Invasive grasses and woody... McGranahan, D.A., D. M. Engle, S. D. Fuhlendorf, J. R. Miller, and D.M. Debinski. 2012. An invasive cool-season grass complicates prescribed fire management in a native warm-season grassland. Natural Areas Journal. 32(2):208-214. DOI: https://doi.org/10.3375/043.032.0214	Debinski, Diane	diane.debinski@montana.edu	Peer Review
97	42		Here is another paper examining effects of drought on butterflies: Debinski, D.M., J.C. Caruthers, D. Cook, J. Crowley and H. Wickham. 2013. Gradient-based habitat affinities predict species vulnerability to climate change. Ecology. 94(5):1036-1045. DOI: http://dx.doi.org/10.1890/12-0359.1	Debinski, Diane	diane.debinski@montana.edu	Peer Review
98	Drought	17	First stage larvae are very susceptible to drought. A good snow cover may be beneficial to keep larvae from desiccating. In contrast, too much moisture can lead to mold, which is just as devastating to all larval instars.	Stephen Spomer	tigerbeetles@outlook.com	Peer Review
98		2	Typo: "qas" should be "as"	Daniel Marschalek	danmarschalek@hotmail.com	Peer Review
Table 11			1) What other species of butterflies in a natural habitat have been characterized as "constantly showing exponential growth in good years"? This seems rather optimistic to me. Is there a reference for this expectation? 2) How did the writers of the report deal with combinations of variables that did not fit the chart categories? Did they default to the poor condition variable(s) to drive the categorization? The description on pg. 114 discusses extirpated, but not other conditions.	Debinski, Diane	diane.debinski@montana.edu	Peer Review

[EXTERNAL] Re: Request For Review of the Draft Regal Fritillary, Eastern and Western Subspecies, SSA Report

Betty Ferster <bferster@gettysburg.edu>

Wed 7/19/2023 6:39 AM

To:Hansen, Craig <Craig_Hansen@fws.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hi Craig,

I have read and enjoyed the SSA report on the regal fritillary and I found nothing I thought was missing or in need of editing. Thank you for letting me read it. It was well written and thorough.

Good luck,

Betty

From: Hansen, Craig <Craig_Hansen@fws.gov>

Sent: Wednesday, May 3, 2023 9:27 PM

To: Betty Ferster <bferster@gettysburg.edu>

Cc: Hansen, Craig <Craig_Hansen@fws.gov>; Lewinsohn, Jennifer (Jena) <jennifer_lewinsohn@fws.gov>; Hansen, Craig <Craig_Hansen@fws.gov>

Subject: Request For Review of the Draft Regal Fritillary, Eastern and Western Subspecies, SSA Report

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Betty Ferster,

The U.S. Fish and Wildlife Service requests your help by serving as a peer reviewer of our draft Species Status Assessment report for the Regal Fritillary, Eastern and Western Subspecies, SSA Report. We use the Species Status Assessment (SSA) process to improve transparency and ensure we are using the best available information to inform Endangered Species Act (ESA) decisions and peer review of the scientific assessment is part of that process.

As a peer reviewer, we are requesting your review of the scientific information relating to your area of expertise. Specifically, we would like your comments on the quality of the scientific information and analyses and whether the best available information was used. This may include identifying any oversights, omissions, and inconsistencies; providing advice on reasonableness of judgments made from the scientific evidence; helping us ensure that scientific uncertainties are identified and characterized; providing advice on the overall strengths and limitations of the scientific data used in the document; and informing us of any scientific information that we did not use.

If you are willing to serve as a peer reviewer, we would appreciate comments by 06/05/2023, to ensure adequate time to incorporate them into our final report. As you review the document, please note that this draft SSA report does not result in or predetermine a decision by the Service under the Act. This document is strictly a characterization of the viability of the species.

The document is located here:

[20230404_DRAFT_SSA_Report_Regal_Fritillary_v10.docx](#)

You can enter your responses here:

[Regal Fritillary, Eastern and Western Subspecies, SSA Report](#)

The point of contact for this report is Craig Hansen in our Mountain-Prairie Regional Office. If you have questions specific to the SSA report or would like any of the literature cited, please feel free to contact Craig Hansen for any species-specific information at 303 236-4749, or Craig_Hansen@fws.gov.

Attached are instructions on how to gain access as well as tips for entering responses.

Thank you very much for your time, and please reach out if you have questions related to the peer review process.

Sincerely,

Craig Hansen

June 5, 2023

Mr. Craig Hansen
Regional Recovery Coordinator
U.S. Fish and Wildlife Service, Region 6
134 Union Boulevard
Lakewood, Colorado 80228

Dear Mr. Hansen,

Thank you for the opportunity to provide feedback on the eastern (*Argynnis idalia idalia*) and western (*A. i. occidentalis*) subspecies of the regal fritillary (*Argynnis (Speyeria) idalia*) Species Status Assessment (SSA). Overall, this report is extremely well written, and it does an excellent job of referencing the literature and summarizing the natural history of the subspecies. I have provided answers to the questions about the content of the SSA report and my comments below.

1. Is our description and analysis of the subspecies' needs, biology, habitat, population trends, and historic and current distribution of the species accurate?

This report includes a thorough description and analysis of the subspecies' needs, biology, habitat, population trends, and historic and current distribution for the Regal Fritillary across the U.S. The geographic regions are carefully divided, designated, and separately analyzed. I also think that the condition categorization approach (very high to very low to extirpated) is a good way to assess the current and future status of the subspecies given that there are not adequate quantitative data on population sizes and population dynamics for many of these regions. In other words, the authors did the best that they could, given the limitations of the data in terms of assessing resiliency.

2. Are our assumptions and definitions of suitable habitat logical and adequate?

The assumptions and definitions of suitable habitat are logical and adequate. However, defining suitable habitat on the ground using land cover classification based on remotely sensed data (as is NLCD) will undoubtedly overestimate native prairie cover. I am not aware of any publications that show how native vs. restored prairie has been differentiated using remotely sensed data, but I have not done a search. Although it may be possible, it would require intense analysis of temporal and spatial data. As such, in many regions, particularly the Midwest, a grassland categorization of landcover will be highly skewed towards restored prairie or grasslands dominated by non-native species. In other regions where there has been less tilling of the land, this may be less of an issue. So, the statement "likely overestimates" might be more accurately stated "undoubtedly overestimates." I was glad to see in Appendix I that additional information was included in some cases to refine grassland categorization, although it is not clear for what percent of the grasslands this was possible.

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3. Are there any significant oversights, omissions, or inconsistencies in our SSA report?

I have a few comments on this question, summarized below.

a) One of my most significant comments is that in assessing possible future scenarios for these subspecies, there is no scenario that includes intensive, large scale tallgrass prairie restoration. Having worked in the Midwestern grassland ecosystem for decades and observed what can be accomplished, I think that such a scenario should be included. I'm assuming that this report does not have to take into consideration the costs of various scenarios. It would not be inexpensive, but it is possible to reconstruct high quality tallgrass prairie, with appropriate nectar and violet host plant species. This was done at Neal Smith National Wildlife Refuge in Iowa. Why not examine the potential for additional such restoration? For other rare species dependent upon particular habitats, it is often much more difficult or even impossible to restore habitat. That is not the case with the Regal Fritillary, so I think it is a missed opportunity not to include such a scenario. Prairie restoration happening on private land is usually at the scale of tens to hundreds, rather than thousands of acres. However, there may be plans for larger scale restoration projects by state, federal, or non-profit conservation organizations that should be considered. If not, such scenarios could be considered by USFWS.

b) When it comes to the Condition Categories (Table 11), all habitat factor variables go down to more degraded states sequentially in the table. I realize that it would be unwieldy to present all combinations of all variables, but how might this projection be used if some habitat factor variables went to a more improved state and others went to a more degraded state? In such a situation would scientists and managers defer to the most limiting variable? That should be stated.

c) This report could benefit by providing recommended areas for future research. I suggest that assessing the direct and indirect effects of pesticides and herbicides on regal fritillaries is one such important future area of research. There is very little known about this topic, and pesticides and herbicides could be having major impacts, especially when large-scale aerial spraying is involved.

4. Are the conclusions we reach logical and supported by the evidence we provide?

From the description of the iterative testing and refining of the species distribution models, my interpretation is that this assessment was done in a careful and methodical way to maximize accuracy. Similarly, the creation and refinement of Analytical Units and Representation Units was done with careful consideration of actual occurrence of the subspecies as well as morphological and genetic differences.

The Cause and Effect Tables (Appendix H) show that analyses required specific details about the types of stressors that could affect the population dynamics and resources available to the Regal Fritillary subspecies under past, current, and future conditions as well as the confidence associated with those predictions. Supporting information shows that the authors of the report did their homework to justify their assumptions.

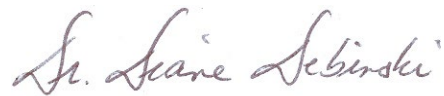
5. Did we include all the necessary and pertinent literature to support our assumptions, arguments, and conclusions?

The literature was well referenced. I did include some additional suggestions in my SSA Report Comments.

I have made additional suggestions associated with particular pages and lines in my SSA Report Comments.

Finally, I would note that the Executive Summary is rather long at 19 pages for a summary, but I am not familiar with the expected length of SSA executive summaries.

Sincerely,

A handwritten signature in cursive script that reads "Dr. Diane Debinski". The signature is written in a dark ink and is positioned above the typed name.

Dr. Diane Debinski
Professor and Head

View results

Respondent

377

Anonymous

10:47

Time to complete

Conflict of Interest Disclosure

1. ID Number *

2206

2. SSA Name *

Regal Fritillary, Eastern and Western Subspecies, SSA Report

3. SSA Point of Contact Email (the @fws.gov address provided in request email) *

Craig_Hansen@fws.gov

4. Your Name *

5. Telephone (work/professional) *

6. Address (work/professional) *

7. Email Address (work/professional) *

8. Current Employer *

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Instructions (continued)

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Such interests could include an individual's stock holdings in excess of \$10,000 in a potentially affected company or being an officer, director, or employee of the company. Serving as a consultant to the company could constitute such an interest if the consulting relationship with the company could be directly affected or is directly related to the subject matter of the regulatory process.

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to the subject matter of the regulatory process and the right to independently conduct and publish the results of this research is limited by the sponsor. Consideration would also need to be given to the interests of others with whom the individual has substantial common financial interests -- particularly spouses, employers, clients, and business or research partners.

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Employment

If the information received by the Service through the peer review process were to provide the basis for government regulatory action or inaction with respect to the species assessed within the pertinent draft SSA report --

9. If you are employed or self-employed, could your current employment or self-employment (or your spouse's current employment or self-employment) be directly affected? *

No



10. To the best of your knowledge, could any financial interests of your (or your spouse's) employer or, if self-employed, your (or your spouse's) clients and/or business partners be directly affected? *

No



11. If you are an officer, director or trustee of any corporation or other legal entity, could the financial interests of that corporation or legal entity be directly affected? *

No



12. If you are a consultant (whether full-time or part-time), could there be a direct effect on any of your current consulting relationships? *

No



13. Regardless of the potential effect on the consulting relationship, do you have any current or continuing consulting relationships (including, for example, commercial and professional consulting and service arrangements, scientific and technical advisory board memberships, serving as an expert witness in litigation, or providing services in exchange for honorariums and travel expense reimbursements) that are directly related to the subject matter of the possible government regulatory action or inaction? *

No



14. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Employment (continued)

15. If you are or have ever been a U.S. Government employee (either civilian or military), to the best of your knowledge, are there any federal conflict of interest restrictions that may be applicable to your service in connection with this peer review? *

Not applicable



16. If you are a U.S. Government employee, are you currently employed by the Service? *

Not applicable



17. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Investment Interests

Taking into account stocks, bonds, and other financial instruments and investments including partnerships (but excluding broadly diversified mutual funds and any investment or financial interest valued at less than \$10,000), if the information received by the Service through the peer review process were to provide the basis for government regulatory action or inaction with respect to the species assessed within the pertinent draft SSA report --

18. Do you or your spouse or minor children own directly or indirectly (e.g., through a trust or an individual account in a pension or profit-sharing plan) any stocks, bonds or other financial instruments or investments that could be affected, either directly or by a direct effect on the business enterprise or activities underlying the investments? *

No



19. Do you have any other significant financial investments or interests such as commercial business interests (e.g., sole proprietorships), investment interests (e.g., stock options), or personal investment relationships (e.g., involving parents or grandchildren) that could be affected, either directly or by a direct effect on the business enterprise or activities underlying the investments? *

No



20. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Property Interests

Taking into account real estate and other tangible property interests, as well as intellectual property (patents, copyrights, etc.) interests, if the information received by the Service through the peer review process were to provide the basis for government regulatory action or inaction with respect to the species assessed within the pertinent draft SSA report --

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22. To the best of your knowledge, do any others with whom you have substantial common financial interests (e.g., employer, business partners, etc.) own directly or indirectly any such property interests that could be directly affected? *

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23. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Research Funding and Other Interests

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No



25. If you answered "Yes" to the question above, briefly describe the circumstances.

Research Funding and Other Interests (continued)

26. Is the central purpose of the proposed rule for which this disclosure form is being prepared a critical review and evaluation of your own work or that of your employer? *

No



27. Do you have any existing professional obligations (e.g., as an officer of a scientific or engineering society) that effectively require you to publicly defend a previously established position on an issue that is relevant to the proposed rule? *

No



28. To the best of your knowledge, will your participation in this peer review process enable you to obtain access to a competitor's or potential competitor's confidential proprietary information? *

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29. Could your service as a peer reviewer create a specific financial or commercial competitive advantage for you or others with whom you have substantial common financial interests? *

No



30. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

View results

Respondent

379

Anonymous

07:04

Time to complete

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1. ID Number *

2209

2. SSA Name *

Regal Fritillary, Eastern and Western Subspecies, SSA Report

3. SSA Point of Contact Email (the @fws.gov address provided in request email) *

Craig_Hansen@fws.gov

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No



10. To the best of your knowledge, could any financial interests of your (or your spouse's) employer or, if self-employed, your (or your spouse's) clients and/or business partners be directly affected? *

No



11. If you are an officer, director or trustee of any corporation or other legal entity, could the financial interests of that corporation or legal entity be directly affected? *

Not applicable



12. If you are a consultant (whether full-time or part-time), could there be a direct effect on any of your current consulting relationships? *

Not applicable



13. Regardless of the potential effect on the consulting relationship, do you have any current or continuing consulting relationships (including, for example, commercial and professional consulting and service arrangements, scientific and technical advisory board memberships, serving as an expert witness in litigation, or providing services in exchange for honorariums and travel expense reimbursements) that are directly related to the subject matter of the possible government regulatory action or inaction? *

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14. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Employment (continued)

15. If you are or have ever been a U.S. Government employee (either civilian or military), to the best of your knowledge, are there any federal conflict of interest restrictions that may be applicable to your service in connection with this peer review? *

No



16. If you are a U.S. Government employee, are you currently employed by the Service? *

No



17. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Investment Interests

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No



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No



20. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Property Interests

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Research Funding and Other Interests (continued)

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No



30. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

View results

Respondent

386

Anonymous

07:29

Time to complete

Conflict of Interest Disclosure

1. ID Number *

2207

2. SSA Name *

Regal Fritillary, Eastern and Western Subspecies, SSA Report

3. SSA Point of Contact Email (the @fws.gov address provided in request email) *

Craig_hansen@fws.gov

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No



11. If you are an officer, director or trustee of any corporation or other legal entity, could the financial interests of that corporation or legal entity be directly affected? *

Not applicable



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Not applicable



13. Regardless of the potential effect on the consulting relationship, do you have any current or continuing consulting relationships (including, for example, commercial and professional consulting and service arrangements, scientific and technical advisory board memberships, serving as an expert witness in litigation, or providing services in exchange for honorariums and travel expense reimbursements) that are directly related to the subject matter of the possible government regulatory action or inaction? *

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14. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Employment (continued)

15. If you are or have ever been a U.S. Government employee (either civilian or military), to the best of your knowledge, are there any federal conflict of interest restrictions that may be applicable to your service in connection with this peer review? *

Not applicable



16. If you are a U.S. Government employee, are you currently employed by the Service? *

Not applicable



17. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Investment Interests

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No



25. If you answered "Yes" to the question above, briefly describe the circumstances.

I have grant funding to study the regal fritillary in Missouri but the listing process will not affect that work.

Research Funding and Other Interests (continued)

26. Is the central purpose of the proposed rule for which this disclosure form is being prepared a critical review and evaluation of your own work or that of your employer? *

No



27. Do you have any existing professional obligations (e.g., as an officer of a scientific or engineering society) that effectively require you to publicly defend a previously established position on an issue that is relevant to the proposed rule? *

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No



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No



30. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

View results

Respondent

378

Anonymous

71:40

Time to complete

Conflict of Interest Disclosure

1. ID Number *

2208

2. SSA Name *

Regal Fritillary, Eastern and Western Subspecies, SSA Report

3. SSA Point of Contact Email (the [@fws.gov](mailto:fws.gov) address provided in request email) *

Craig_Hansen@fws.gov

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No



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Not applicable



12. If you are a consultant (whether full-time or part-time), could there be a direct effect on any of your current consulting relationships? *

Not applicable



13. Regardless of the potential effect on the consulting relationship, do you have any current or continuing consulting relationships (including, for example, commercial and professional consulting and service arrangements, scientific and technical advisory board memberships, serving as an expert witness in litigation, or providing services in exchange for honorariums and travel expense reimbursements) that are directly related to the subject matter of the possible government regulatory action or inaction? *

No



14. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Employment (continued)

15. If you are or have ever been a U.S. Government employee (either civilian or military), to the best of your knowledge, are there any federal conflict of interest restrictions that may be applicable to your service in connection with this peer review? *

Not applicable



16. If you are a U.S. Government employee, are you currently employed by the Service? *

Not applicable



17. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Investment Interests

Taking into account stocks, bonds, and other financial instruments and investments including partnerships (but excluding broadly diversified mutual funds and any investment or financial interest valued at less than \$10,000), if the information received by the Service through the peer review process were to provide the basis for government regulatory action or inaction with respect to the species assessed within the pertinent draft SSA report --

18. Do you or your spouse or minor children own directly or indirectly (e.g., through a trust or an individual account in a pension or profit-sharing plan) any stocks, bonds or other financial instruments or investments that could be affected, either directly or by a direct effect on the business enterprise or activities underlying the investments? *

No



19. Do you have any other significant financial investments or interests such as commercial business interests (e.g., sole proprietorships), investment interests (e.g., stock options), or personal investment relationships (e.g., involving parents or grandchildren) that could be affected, either directly or by a direct effect on the business enterprise or activities underlying the investments? *

No



20. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Property Interests

Taking into account real estate and other tangible property interests, as well as intellectual property (patents, copyrights, etc.) interests, if the information received by the Service through the peer review process were to provide the basis for government regulatory action or inaction with respect to the species assessed within the pertinent draft SSA report --

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22. To the best of your knowledge, do any others with whom you have substantial common financial interests (e.g., employer, business partners, etc.) own directly or indirectly any such property interests that could be directly affected? *

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23. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

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No



25. If you answered "Yes" to the question above, briefly describe the circumstances.

Research Funding and Other Interests (continued)

26. Is the central purpose of the proposed rule for which this disclosure form is being prepared a critical review and evaluation of your own work or that of your employer? *

No



27. Do you have any existing professional obligations (e.g., as an officer of a scientific or engineering society) that effectively require you to publicly defend a previously established position on an issue that is relevant to the proposed rule? *

No



28. To the best of your knowledge, will your participation in this peer review process enable you to obtain access to a competitor's or potential competitor's confidential proprietary information? *

No



29. Could your service as a peer reviewer create a specific financial or commercial competitive advantage for you or others with whom you have substantial common financial interests? *

No



30. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

View results

Respondent

382

Anonymous

03:52

Time to complete

Conflict of Interest Disclosure

1. ID Number *

2210

2. SSA Name *

Regal Fritillary, Eastern and Western Subspecies, SSA Report

3. SSA Point of Contact Email (the [@fws.gov](mailto:fws.gov) address provided in request email) *

Craig_Hansen@fws.gov

4. Your Name *

5. Telephone (work/professional) *

6. Address (work/professional) *

7. Email Address (work/professional) *

8. Current Employer *

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Employment

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No



10. To the best of your knowledge, could any financial interests of your (or your spouse's) employer or, if self-employed, your (or your spouse's) clients and/or business partners be directly affected? *

No



11. If you are an officer, director or trustee of any corporation or other legal entity, could the financial interests of that corporation or legal entity be directly affected? *

No



12. If you are a consultant (whether full-time or part-time), could there be a direct effect on any of your current consulting relationships? *

No



13. Regardless of the potential effect on the consulting relationship, do you have any current or continuing consulting relationships (including, for example, commercial and professional consulting and service arrangements, scientific and technical advisory board memberships, serving as an expert witness in litigation, or providing services in exchange for honorariums and travel expense reimbursements) that are directly related to the subject matter of the possible government regulatory action or inaction? *

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14. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Employment (continued)

15. If you are or have ever been a U.S. Government employee (either civilian or military), to the best of your knowledge, are there any federal conflict of interest restrictions that may be applicable to your service in connection with this peer review? *

No



16. If you are a U.S. Government employee, are you currently employed by the Service? *

No



17. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Investment Interests

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No



19. Do you have any other significant financial investments or interests such as commercial business interests (e.g., sole proprietorships), investment interests (e.g., stock options), or personal investment relationships (e.g., involving parents or grandchildren) that could be affected, either directly or by a direct effect on the business enterprise or activities underlying the investments? *

No



20. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Property Interests

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21. Do you or your spouse or minor children own directly or indirectly any such property interests that could be directly affected? *

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No



25. If you answered "Yes" to the question above, briefly describe the circumstances.

Research Funding and Other Interests (continued)

26. Is the central purpose of the proposed rule for which this disclosure form is being prepared a critical review and evaluation of your own work or that of your employer? *

No



27. Do you have any existing professional obligations (e.g., as an officer of a scientific or engineering society) that effectively require you to publicly defend a previously established position on an issue that is relevant to the proposed rule? *

No



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No



29. Could your service as a peer reviewer create a specific financial or commercial competitive advantage for you or others with whom you have substantial common financial interests? *

No



30. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

View results

Respondent

381

Anonymous

06:31

Time to complete

Conflict of Interest Disclosure

1. ID Number *

2205

2. SSA Name *

Regal fritillary, Eastern and Western Subspecies, SSA Report

3. SSA Point of Contact Email (the @fws.gov address provided in request email) *

Craig_Hansen@fws.gov

4. Your Name *

5. Telephone (work/professional) *

6. Address (work/professional) *

7. Email Address (work/professional) *

8. Current Employer *

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Instructions (continued)

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Employment

If the information received by the Service through the peer review process were to provide the basis for government regulatory action or inaction with respect to the species assessed within the pertinent draft SSA report --

9. If you are employed or self-employed, could your current employment or self-employment (or your spouse's current employment or self-employment) be directly affected? *

No



10. To the best of your knowledge, could any financial interests of your (or your spouse's) employer or, if self-employed, your (or your spouse's) clients and/or business partners be directly affected? *

No



11. If you are an officer, director or trustee of any corporation or other legal entity, could the financial interests of that corporation or legal entity be directly affected? *

Not applicable



12. If you are a consultant (whether full-time or part-time), could there be a direct effect on any of your current consulting relationships? *

No



13. Regardless of the potential effect on the consulting relationship, do you have any current or continuing consulting relationships (including, for example, commercial and professional consulting and service arrangements, scientific and technical advisory board memberships, serving as an expert witness in litigation, or providing services in exchange for honorariums and travel expense reimbursements) that are directly related to the subject matter of the possible government regulatory action or inaction? *

No



14. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

I have done surveys for rare butterflies for USFS and Nebraska Game & Parks Commission in the past, but none since 2014

Employment (continued)

15. If you are or have ever been a U.S. Government employee (either civilian or military), to the best of your knowledge, are there any federal conflict of interest restrictions that may be applicable to your service in connection with this peer review? *

No



16. If you are a U.S. Government employee, are you currently employed by the Service? *

Not applicable



17. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Investment Interests

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No



19. Do you have any other significant financial investments or interests such as commercial business interests (e.g., sole proprietorships), investment interests (e.g., stock options), or personal investment relationships (e.g., involving parents or grandchildren) that could be affected, either directly or by a direct effect on the business enterprise or activities underlying the investments? *

No



20. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

Property Interests

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No



25. If you answered "Yes" to the question above, briefly describe the circumstances.

Research Funding and Other Interests (continued)

26. Is the central purpose of the proposed rule for which this disclosure form is being prepared a critical review and evaluation of your own work or that of your employer? *

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27. Do you have any existing professional obligations (e.g., as an officer of a scientific or engineering society) that effectively require you to publicly defend a previously established position on an issue that is relevant to the proposed rule? *

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No



30. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

View results

Respondent

391

Anonymous

05:14

Time to complete

Conflict of Interest Disclosure

1. ID Number *

2373

2. SSA Name *

Regal Fritillary, Eastern and Western Subspecies, SSA Report

3. SSA Point of Contact Email (the [@fws.gov](mailto:fws.gov) address provided in request email) *

Craig_Hansen@fws.gov

4. Your Name *

5. Telephone (work/professional) *

6. Address (work/professional) *

7. Email Address (work/professional) *

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Not applicable



12. If you are a consultant (whether full-time or part-time), could there be a direct effect on any of your current consulting relationships? *

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Employment (continued)

15. If you are or have ever been a U.S. Government employee (either civilian or military), to the best of your knowledge, are there any federal conflict of interest restrictions that may be applicable to your service in connection with this peer review? *

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20. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

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25. If you answered "Yes" to the question above, briefly describe the circumstances.

Research Funding and Other Interests (continued)

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