

From: [Daniel Thompson](#)
To: [Hansen, Craig](#)
Subject: Re: [EXTERNAL] Re: PEER REVIEW REQUEST | Proposed Establishment of a Nonessential Experimental Population of the Gray Wolf (*Canis lupus*) in Colorado
Date: Thursday, April 20, 2023 8:37:57 PM
Attachments: [Outlook-nyw0tuu4.png](#)
[Outlook-irdgpczt.png](#)
[Outlook-2ekr3twz.png](#)

Hi Craig,

I ended up having to deal with some unforeseen conflict issues (tis the season). If I am unable to get my full peer review comments back to you by tomorrow will send them over the weekend. Apologize for this but it appears you have over 20,000 comments from the public too!! Overall the document is good, there are some minor things that would be beneficial that I was keeping track of separately that I offer but again will send with the full file once back to the office. I am including the below notes as mentioned that were garnered from our lead wolf biologist as well in his own separate review of the document that will be useful

The Wyoming state boundary is also the Northern Rocky Mountain gray wolf DPS boundary, which means the two areas under consideration are independent as described by the ESA and should be treated/managed independently. ESA designations outside DPS boundaries cannot impact management within the DPS by the very nature of DPS rules (DPS populations are distinct and independent of other populations) so wolves in Wyoming (regardless of origin) must be managed under the respective rules of the NRM DPS (WY statute, WGFC regulation, and WY wolf management plan).

Wolf numbers are compared to OR and WA during the early years of wolf recolonization in those states. This is not the most appropriate comparison because wolves recolonized OR and WA from an actively reintroduced population of 35 wolves in ID. CO is proposing to actively reintroduce 30-45 wolves, thus population growth (which was more rapid in ID than in OR and WA) is the better comparison.

ID and the GYE wolf populations probably showed very little intrinsic population regulation outside of reaching carrying capacity as determined by prey availability (i.e., numbers were not actively intrinsically regulated by wolf sociality).

Elk population and harvest comparisons statewide in MT, ID, and WY do not represent the trend in areas occupied by wolves. The discussion that follows concerning MT acknowledges this, but in WY, statewide generalization drowns out any potential impacts in NW WY.

This is more specific to where I work, but there is a need to clarify the use of wolf-livestock conflicts from the Wyoming Game and Fish annual report(s). You should either report statewide or in the trophy game management area only, the mix and match which leads to confusion (I mentioned this in earlier discussions prior to the draft). Also, the number of wolves and conflicts are reported as definite numbers, not minimums. Actual conflicts, especially depredated cattle, are higher.

Lethal removal of offending individuals in WY has been an effective tool to reduce conflict while allowing the population to increase while listed and while managing the delisted population. Liz Bradley and others citation...

Curious in the bullets you present benchmarks on survival and mortality on different time scales. Why high survival for the first 6 months and low mortality the first 2-3 years? Could you have low survival past 6 months and still have low mortality out to 2-3 years for the same animals???

The EIS mentions Great Lakes wolves as a potential source for reintroduction to CO. While both areas are in the designated historic range of the subspecies *C.l. nubilis*, the modern wolf in the Great Lakes has historic admixture with Eastern wolves (and to a lesser degree, coyotes). I don't believe WY would be in favor of introducing an admixed gray wolf that would spread into the state and interbreed with western gray wolves. The potential may be small, but historic admixture with other canids by gray wolves from the Great Lakes could portend an increased risk of hybridization with other canids in the west (i.e., primarily coyotes). This is especially true in the early years of a reintroduction program that plans to hard-release reproductively mature individuals during the breeding season into an environment with severely limited opportunity to reproduce with conspecifics, yet an abundant source of non-conspecific coyotes. Gray wolves in the western US have no history of hybridizing with coyotes, and should be the target source for reintroduction to ensure genetic integrity of the wolf population in CO and surrounding states (WY and the Mexican Wolf DPS). Here's a very recent article about Great Lakes wolf genetics:

<https://academic.oup.com/mbe/article/40/4/msad055/7103497?login=false>

On Tue, Apr 18, 2023 at 5:43 PM Hansen, Craig <Craig_Hansen@fws.gov> wrote:

Copy. Thank you so much.

Craig.

From: Daniel Thompson <daniel.thompson@wyo.gov>

Sent: Tuesday, April 18, 2023 5:39 PM

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

Subject: [EXTERNAL] Re: PEER REVIEW REQUEST | Proposed Establishment of a Nonessential Experimental Population of the Gray Wolf (*Canis lupus*) in Colorado

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I was just chatting with Scott Becker here with FWS, I plan to submit comments tomorrow or next day. Thanks Craig.

DT

On Tuesday, April 18, 2023, Hansen, Craig <Craig_Hansen@fws.gov> wrote:

Greetings,

Just a friendly check-in on this peer review request. Please let me know if I can be of any assistance.

Thank you so much for your time.

Sincerely,

Craig Hansen

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

Sent: Thursday, February 16, 2023 7:32 AM

To: daniel thompson <daniel.thompson@wyo.gov>

Subject: Fw: [EXTERNAL] Re: PEER REVIEW REQUEST | Proposed Establishment of a Nonessential Experimental Population of the Gray Wolf (*Canis lupus*) in Colorado

Dear Dr. Thompson:

Thank you for your willingness to participate as a scientific peer reviewer of the U.S. Fish and Wildlife Service's (Service's) [proposed rule to establish a nonessential experimental population \(NEP\) of the gray wolf \(*Canis lupus*\) in the State of Colorado](#), under section 10(j) of the Endangered Species Act of 1973, as amended (Act) (Docket No. FWS-R6-ES-2022-0100). Following the 60-day public comment period, which closes on **April 18, 2023**, we will review and address all peer and public comments, and work to finalize this rulemaking.

Thank you for completing your conflict of interest form. I have reviewed and approved your submission.

BACKGROUND INFORMATION:

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 now invite your assistance in conducting an independent peer review of this proposed rule. The purpose of this peer review is to ensure that our proposed rule is based on scientifically sound data, assumptions, and analyses. The [Peer Review Plan](#) for this rulemaking provides additional information.

During this peer review process, we invite you to comment on the specific assumptions and scientific assessments included in proposed rule. The opinions of all peer reviewers

will be incorporated or summarized, and your input will be taken into consideration as part of our rulemaking process.

Additionally, we ask that you focus your review of the document on the scientific information and analyses relevant to your area of expertise. Please note that we are not asking for and will not accept input on the policy determinations that we are charged with making under the Act. The Service retains full control over relevant policy determinations and no pre-decisional assumptions regarding those determinations will be discussed. You were selected as peer reviewer based solely on your scientific qualifications, rather than as a representative of any particular position of an agency, employer, or other interested party.

We ask that you consider the following questions about the content of the documents, and we welcome any other relevant comments:

1. Is our description and analysis of the biology, habitat, population trends, conservation status, and historical and current distribution of the species accurate?
2. Are there any significant oversights, omissions, or inconsistencies?
3. Are the conclusions we reach logical and supported by the evidence we provide?
4. Did we include all the necessary and pertinent literature to support our assumptions, arguments, and conclusions?
5. Are there additional considerations regarding the geographic boundary of the NEP, the adequacy of the proposed regulations for the NEP, or additional management that may be needed to address expanding gray wolf populations?

If you find that our data are inadequate, please identify additional data or studies that may be needed. Please provide literature, data, and full citations, if appropriate.

Please be aware that your comments, including your name and address, will be included in the administrative record for this action, which will be available to the public, upon request. Per our peer review policy, we must also post your complete conflict of interest forms to our agency's [peer review webpage](#); the policy also directs us to make your comments available to the public, either on our own website or on [Regulations.gov](#) with the associated docket (FWS-R6-ES-2022-0100).

DOCUMENTS NEEDED FOR YOUR PEER REVIEW:

You may access the proposed rule, the references cited, and the peer review plan using the following hyperlinks:

- [Peer Review Plan](#):
- [Proposed rule for your peer review](#)

- [References Cited in the Proposed Rule](#)

DUE DATE:

We would appreciate receiving your peer review in 60 days from the publication in the *Federal Register*, so by **April 18, 2023**, **returned by email to me at craig_hansen@fws.gov**. No need to also submit your peer review through Regulations.gov.

Thank you again for your time and expertise to help us ensure that our proposed rule includes the best possible scientific information and analyses. I look forward to receiving your review. Please do not hesitate to contact me at any time by telephone or email if I can answer any questions.

Sincerely,

Craig Hansen
U.S. Fish and Wildlife Service
(303) 236-4749; craig_hansen@fws.gov

From: Daniel Thompson <daniel.thompson@wyo.gov>

Sent: Tuesday, February 14, 2023 9:58 AM

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

Subject: Re: [EXTERNAL] Re: PEER REVIEW REQUEST | Proposed Establishment of a Nonessential Experimental Population of the Gray Wolf (*Canis lupus*) in Colorado

Very good, I wanted to make sure I was conveying absolute truth in that I obviously work with ESA issues and wolves and such but nothing that would be classified as an actual conflict of interest.

On Tue, Feb 14, 2023 at 9:27 AM Hansen, Craig <Craig_Hansen@fws.gov> wrote:
COI Form received and approved. Thank you!

Craig.

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

Sent: Tuesday, February 14, 2023 9:04 AM

To: daniel thompson <daniel.thompson@wyo.gov>

Subject: Re: [EXTERNAL] Re: PEER REVIEW REQUEST | Proposed Establishment of a Nonessential Experimental Population of the Gray Wolf (*Canis lupus*) in Colorado

Most appreciated! I'll be in touch with the documents when they are ready and after we review your COI form.

Craig.

From: Daniel Thompson <daniel.thompson@wyo.gov>

Sent: Tuesday, February 14, 2023 8:46 AM

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

Subject: Re: [EXTERNAL] Re: PEER REVIEW REQUEST | Proposed Establishment of a Nonessential Experimental Population of the Gray Wolf (*Canis lupus*) in Colorado

Oh very good, yes that would not be a problem (I was just hoping it wasn't >350 pages!). Will do.

Dan

On Tue, Feb 14, 2023 at 8:43 AM Hansen, Craig <Craig_Hansen@fws.gov> wrote:
Most appreciated.

The document is currently 82 pages in Word, double spaced with a 1.5-inch left margin, if helpful.

At your convenience, and if you are still able to participate as a peer reviewer, please complete this conflict of interest form at your earliest convenience:

- **COI Form:** <https://forms.office.com/g/fEq1hk41Ls>
 - **ID Number:** Leave blank
 - **Rulemaking name:** Colorado gray wolf 10(j)
 - **Point of Contact email:** craig_hansen@fws.gov

I expect to be able to distribute the document later this week. You would have 60 days for your peer review.

Thank you!

Craig Hansen

From: Daniel Thompson <daniel.thompson@wyo.gov>

Sent: Tuesday, February 14, 2023 8:32 AM

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

Subject: [EXTERNAL] Re: PEER REVIEW REQUEST | Proposed Establishment of a Nonessential Experimental Population of the Gray Wolf (*Canis lupus*) in Colorado

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Hello Craig,

Yes I would be interested in serving as a peer reviewer and have obtained approval to do so from our Wildlife Administration. We are curious as to the overall length of the document in regards to timing and workload with many other projects occurring concurrently.

Thanks for the offer.

Dan

On Mon, Feb 13, 2023 at 2:29 PM Hansen, Craig <Craig_Hansen@fws.gov> wrote:
PEER REVIEW REQUEST | Proposed Establishment of a Nonessential Experimental Population of the Gray Wolf (*Canis lupus*) in Colorado

Greetings:

The U.S. Fish & Wildlife Service (Service) has drafted a proposed rule to establish a nonessential experimental population (NEP) of the gray wolf (*Canis lupus*) in the State of Colorado, under section 10(j) of the Endangered Species Act of 1973, as amended (Act). You have been recommended as a potential peer reviewer of the proposed rule based on your area of scientific expertise. I am writing to to ask whether you would be willing and available to serve as a peer reviewer of this document.

Peer review will run concurrently with the proposed rule's public comment period. If you agree to participate as a peer reviewer, I anticipate distributing the document within the next week, or as soon as the document publishes in the *Federal Register*. You would then have **60 days** to provide your peer review back to me by email. We will not be providing financial compensation to peer reviewers. Before receiving the document, you would be asked to complete and return an online conflict of interest form.

Additional information about this peer review process and specific questions to help focus the peer review can be found in the attached peer review plan. Please let me know as soon as possible, preferably by **this Friday, February 17, 2023**, whether you would be willing and able to participate as a peer reviewer. Please do not

hesitate to contact me with any questions.

We would greatly appreciate your input, expertise, and time. Thank you for your consideration.

Sincerely,

Craig Hansen
Regional Recovery Coordinator - Mountain-Prairie Region
U.S. Fish and Wildlife Service



Craig Hansen
U.S. Fish & Wildlife Service, Region 6
Ecological Services - Branch of Classification & Recovery
Recovery Coordinator / Fish & Wildlife Biologist
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Email: craig_hansen@fws.gov



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