A Peer Review Plan for the
American Burying Beetle
Species Status Assessment draft Report

Austin Texas Ecological Services Field Office
U.S. Fish and Wildlife Service, Region 2

About the Document:

The format of this peer review plan reflects the necessary items enumerated in the 2004 Office of Management and Budget memorandum M-05-03 entitled “Final Information Quality Bulletin for Peer Review” (p. 29 i-x; https://www.whitehouse.gov/omb/memoranda_fy2005_m05-03). Further, in accordance with the Service’s 2016 memorandum entitled “Peer Review Process” (https://www.fws.gov/endangered/improving_ESA/peer_review_process.html) an independent office, otherwise not associated with the dissemination, will select peer reviewers and coordinate the process.

(i) Subject and purpose. The Service’s Tulsa Oklahoma Field Office (and others) is drafting a Species Status Assessment (SSA) report to inform an evaluation of the status of the American burying beetle (Nicrophorus americanus) under the Endangered Species Act of 1973, as amended (Act). The SSA report is a comprehensive evaluation of the biological status of the American burying beetle and its viability as a species. The SSA report considers the ecological needs as well as current and forecasted future conditions for the species. The SSA report will be used to inform a decision (to later be published in a 12-month finding) to classify the American burying beetle as threatened, endangered or “not warranted” under the Act. Public inquiries may be directed to the agency contact listed below.

(ii) Importance of the “dissemination”. The SSA report will disseminate likely “influential scientific information” and provide the scientific foundation to inform any subsequent listing determination and/or recovery plan under the Act.

About the Peer Review Process:

(iii) Timing of the review: Reviewers will be given thirty (30) days to complete their reviews; likely between 15 January and 15 February, 2017.

(iv) Type of review: The Service will solicit written letters from independent scientific peer reviewers who will submit to the Service, as individuals, comments and responses to questions posed to them.

(v and vi) About public participation: If the SSA report is used to support a classification determination, the public will then have the opportunity to comment on that proposed rule or finding when it is published. The Service will not be providing public comments to the peer reviewers before they conduct their review. The public is invited to submit comments on this peer review plan by sending emails to the agency contact listed below. The Service will summarize in the final decision document, and make publicly available, copies of each individual independent peer review letter.

(vii) Number of reviewers: The Service will use at least three (3) but not more than ten (10) individual independent subject matter expert peer reviewers.
(viii) **Necessary expertise.** The Service seeks peer reviewers with expertise in the following topics of scientific investigation including:

- Biology and Ecology of burying beetles and other invertebrates
- Biology and Ecology of appropriate carrion species, including but not limited to small mammals and ground nesting birds
- Climate Change and Global Change
- Conservation Biology
- Population viability modeling
- Land cover land use patterns and change
- Landscape ecology

**Scope of the review.** Different reviewers may be assigned to review different chapters of the draft SSA report. Peer reviewers will be advised that they should not provide advice on policy, including a decision-maker’s tolerances for risk and uncertainty. The Service will charge each peer reviewer with the following questions:

- Have we assembled and considered the best available scientific and commercial information relevant to the status of the American burying beetle?
- Is our analysis of this information correct and properly applied?
- Are our scientific conclusions reasonable in light of the information provided?
- Are scientific uncertainties clearly identified and characterized? Are the implications of the uncertainties clearly articulated?
- Are the biological outcomes plausible?

(ix and x) **Selection of peer reviewers.** The Service will solicit independent peer reviews from a pool of subject matter experts including, but not limited, those nominated by the American burying beetle draft SSA report team. The public, including scientific and professional societies, may nominate potential peer reviewers by sending an email to the agency contact. The Service’s Austin Texas Field Office will select peer reviewers based on their expertise with the subject matter and as described in the OMB guidelines, which also includes provisions to ensure balance, independence, objectivity, and avoidance of real or perceived conflicts of interest. Each reviewer will submit a conflict of interest disclosure that will be posted along with the peer review plan on the Service’s Science Excellence website (https://www.fws.gov/science) and made publicly available.

**Agency contact:** Adam Zerrenner, Field Supervisor, 512-490-0057 or adam_zerrenner@fws.gov

**Enclosed:** Conflict of Interest Certificate (1 page)
Dear Sir or Madam,

I write to request your assistance in providing an independent peer review of a draft report that represents a comprehensive review of the best scientific and commercially-available information relevant to the status of endangered American burying beetle (*Nicrophorus americanus*).

The U.S. Fish and Wildlife Service (Service) has adopted the Species Status Assessment (SSA) Framework as an analytical approach to deliver foundational science for informing all Endangered Species Act (ESA) decisions. I enclose a fact sheet to provide you with additional background about the SSA Framework. The Service is drafting an SSA report for the American burying beetle, which addresses the biological status of the American burying beetle in terms of the needs of the species, potential risk factors, current conditions, and forecasted future conditions. The draft SSA report further describes future viability of the American burying beetle in terms of the “three-Rs” of resiliency and redundancy of populations as well as genetic and ecological representation of the species. It is worth mentioning that the SSA report informs the decision-making process and does not represent a decision in itself.

As part of the continuing effort to improve Endangered Species Act implementation, the U.S. Fish and Wildlife Service has updated its policy guidance for conducting peer reviews on listing and recovery actions to ensure that the scientific peer review process is as rigorous, transparent and consistent as possible. More information about the peer review process and policy can be found in the enclosed Peer Review Plan and required Conflict of Interest Certificate, both of which are publicly available (https://www.fws.gov/southwest/science/peer_review.html).

I believe you to have important and relevant subject matter expertise and request your assistance in providing an independent peer review of the enclosed draft SSA report for the American burying beetle. We respectfully request that all peer reviews be completed and returned within thirty (30) days of receipt of the draft SSA report.
Thank you in advance for your assistance in this matter. Please contact Chris Harper by phone (512-490-0057 x245) or email (chris_harper@fws.gov) with any questions or concerns.

Sincerely,

Adam Zerrenner,
Field Supervisor

Enclosures:

- American burying beetle SSA draft report (for your review)
- Peer review plan for the American burying beetle SSA draft report (for your information)
- Conflict of interest certificate (please sign and return with your peer review letter)
CONFLICT OF INTEREST CERTIFICATE

**Paragraph 1.** I certify that I am not aware of any matter which might affect my ability to participate in this peer review in an objective and unbiased manner or which might place me in a position of conflict, real or apparent, between my responsibilities as an evaluator or advisor and other interests.

**Paragraph 2.** In making this certification, I have considered all my stocks, bonds, other financial interests, positions of trust, employment arrangements (past, present, or under consideration) and, to the extent known by me, all the financial interests, close personal relationships, positions of trust and employment arrangements of my spouse, my children, and other members of my immediate household.

**Paragraph 3.** If, after the date of this certification, to my knowledge, I have a change of circumstance addressed in paragraph 2 (including my spouse, children, and other members of my immediate household) regarding the proposed project above, I will notify the responsible staff officer.

Name of Peer Reviewer (Printed)

________________________________________

Signature of Peer Reviewer          Date
Realized Benefits

Defensibility – analysis grounded in accepted science and a logical process with stated assumptions and complete reasoning clearly informs our ESA decisions.

Consistency – consistent framework and terminology is used across all ESA functions across all regions and field offices.

Clarity – by identifying the roles of science and policy in ESA decision making, and having structured processes for each results in increased transparency.

Efficiency – structured and repeatable biological analysis saves time. Stand alone science documents provide savings that could best be used for active conservation.

Effectiveness – clearly articulated reasoned decisions foster effective communication and improved opportunities for conservation.

Collaboration – a better forum for being inclusive; partners are involved to understand and support biological analysis.

“The Species Status Assessment is a unique opportunity to transform how the Fish and Wildlife Service delivers conservation.”

— Gary Frazer, Assistant Director Ecological Services Program
U.S. Fish and Wildlife Service, Washington, DC
An SSA begins with a compilation of the best available information on the species (taxonomy, life history, and habitat) and its ecological needs at the individual, population, and/or species levels based on how environmental factors are understood to act on the species and its habitat. Next, an SSA describes the current condition of the species’ habitat and demographics, and the probable explanations for past and ongoing changes in abundance and distribution within the species’ ecological settings (i.e., areas representative of geographic, genetic, or life history variation across the range of the species). Lastly, an SSA forecasts the species’ response to probable future scenarios of environmental conditions and conservation efforts. Overall, an SSA uses the conservation biology principles of resiliency, redundancy, and representation (collectively known as the “3Rs”) as a lens to evaluate the current and future condition of the species. As a result, the SSA characterizes a species’ ability to sustain populations in the wild over time based on the best scientific understanding of current and future abundance and distribution within the species’ ecological settings.

An SSA is in essence a biological risk assessment to aid decision makers who must use the best available scientific information to make policy decisions. The SSA provides decision makers with a scientifically rigorous characterization of species status that focuses on the likelihood that the species will sustain populations within its ecological settings along with key uncertainties in that characterization. The SSA does not result in a decision directly, but it provides the best available scientific information for comparison to policy standards to guide ESA decisions.

“The SSA is an intuitive framework that helped me clearly and quickly develop, explain, and write our biological analysis to support the ESA determination for Gunnison’s prairie dog.”

– Craig Hansen, USFWS Species Lead for Gunnison’s prairie dog

U.S. Fish and Wildlife Service
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