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Regarding the proposed rule FWS–R8–ES–2016–0078

After reviewing the document and understanding that *Chorizanthe parryi* var. *fernandina* exists in only a few small isolated populations, I concur with the recommendation to list the species as threatened. The risks posed by the potential introduction of Argentine ants throughout the species' already very limited range, and the likely resulting impact to the species' pollinators could pose a species-level threat to the reproductive potential of the plant and there for the plant's probability of persistence. There are a number of studies, which are already cited in the proposed rule, that indicate that there would likely be a complete loss or significant reduction in the pollination rate of *Chorizanthe parryi* var. *fernandina* if and when Argentine ants are likely introduced to the population via proposed development discussed in the document.

Additionally, I'd recommend that the buffer between the development proposed by Newhall Land company and the population of *Chorizanthe parryi* var. *fernandina* be increased to at least 300 m to accommodate the time and space necessary to combat and control Argentine ant expansion from proposed development sites into *Chorizanthe parryi* var. *fernandina* habitat.

Importantly there is no approved plan to reduce the likelihood of introducing Argentine ants to the site or mitigating their effect if Argentine ants are introduced. Given potential ant control methods in existence, it is crucial that very qualified pest control professionals and conservation managers are allowed to review and approve any such control or mitigation plan. Most of the available methods of ant control could potentially do more harm than good, if not applied correctly. Thus I'd suggest that serious review of any such protocol be undertaken before it is actaed and before these populations are put at additional risk of Argentine ant invasion.

Sincerely,

Christina Boser
The Nature Conservancy