

# Review of: Draft Species Status Assessment

## San Joaquin Valley Giant Flower-Loving Fly (*Rhaphiomidas trochilus*)

- (1) Have we assembled and considered the best available scientific and commercial information relevant to this species?

The draft species status assessment for the San Joaquin Valley Giant Flower-Loving Fly (*Rhaphiomidas trochilus*) is comprehensive and complete.

- (2) Is our analysis of this information correct?

There are several of the potential hazards to the species survival that were not fully considered. **(1)**: The effect of Off-Highway Vehicles (OHVs). There are no published reports that support the claim that this would be beneficial for the survival of the SJF or any dune arthropod. While it is true that OHVs do remove vegetation this is done haphazardly potentially removing vegetation needed for the survival of the SJF (Van Dam and Van Dam 2008). In addition, as the pupa rest below the surface of the soil potentially for prolonged periods of time (years), OHV activity will destroy many SJF in addition to potential food sources for the flies. I can see no long term benefit of OHV activity for the SJF. There are many other ways that vegetation could be controlled that would not involve this destructive haphazard activity.

**(2)**: Given where the SJF has been historically abundant on the Sand Ridge locality the potential mining expansion into more habitat seems to be underestimated as to its impact on the SJF. The "7.5 percent of the currently available total" is an underestimation given the rest of the habitat supports few flies due to invasive vegetation overgrowth. From the aerial photographs this area looks to be closer to ~50% of the current viable habitat for the SJF, although maps of the proposed expansion were not provided.

- (3) Are our scientific conclusions reasonable in light of this information?

The conclusions are largely correct except for the two following points: **(1)** OHV activity will not result in a positive outcome for the species. **(2)** The proposed continuation of sand mining operations will result in a much larger negative impact for the SJF than currently considered. In addition, I see this as the greatest threat to the species given all the other factors listed.

Sincerely,

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