

From: Lazar, Kristi@Wildlife <Kristi.Lazar@wildlife.ca.gov>
Date: Fri, Feb 23, 2018 at 8:04 AM
Subject: RE: Request for Partner Review - La Graciosa Thistle
To: "Darst, Cat" <cat_darst@fws.gov>
Cc: Chris Kofron <chris_kofron@fws.gov>, "Nelson, Misty@Wildlife" <Misty.Nelson@wildlife.ca.gov>

Hi Cat and Chris,

I reviewed the information contained in the 2018 Draft Species Status Assessment for the La Graciosa thistle. I spent my time reviewing the portions that related directly to information in CNDDDB and have attached my comments. I also included a document with the references that it would be great if CNDDDB could get copies of so that we can update our records. I have provided information on how to access our FTP site if needed for transfer of large documents (see attached PDF).

Thank you for allowing me the opportunity to comment and I am very impressed with the level of detail and thoroughness that went into this SSA. Please let me know if you have any questions about my comments. I will be in the office next week but will then be out of the office for the two weeks following that and will not be checking my email during that time. Thank you.

Sincerely,

Kristi Lazar, Lead Botanist
California Natural Diversity Database (CNDDDB)
Department of Fish and Wildlife
Mailing address: P.O. Box 944209, Sacramento, CA 94244-2090
E-mail: Kristi.Lazar@wildlife.ca.gov
Phone: (916) 327-6292

From: Darst, Cat [mailto:cat_darst@fws.gov]
Sent: Monday, January 29, 2018 10:36 AM
To: Lazar, Kristi@Wildlife <Kristi.Lazar@wildlife.ca.gov>
Cc: Chris Kofron <chris_kofron@fws.gov>
Subject: Request for Partner Review - La Graciosa Thistle

Dear Kristi,

The U.S. Fish and Wildlife Service (Service) is soliciting review of the information contained in our 2018 Draft Species Status Assessment for the La Graciosa Thistle (*Cirsium scariosum* var. *loncholepis* [*Cirsium loncholepis*]). This analysis will provide the foundation for development of a recovery plan for the species. Please see attached. We value your input and are seeking your comments as part of our evaluation process.

A Species Status Assessment (SSA) is an internal Service document that provides a scientifically rigorous characterization of the species' biological and conservation status, focusing on the likelihood of whether the species will sustain populations while also explicitly acknowledging uncertainties in that characterization. Please let us know if you would like us to provide any of the referenced materials to help facilitate your review.

We are providing this draft SSA Report for your agency review. We will review your comments and incorporate them into the SSA, where appropriate, prior to finalizing the document. Please note that the Service is not seeking advice on policy or recommendations on the legal status of the species. Rather, the Service requests that you focus your review on the accuracy of the biological information. The following questions are provided to aid, but not constrain, your review:

1. Have we assembled and considered the best available scientific and commercial information relevant to this species?
2. Is our analysis of this information correct?
3. Are our scientific conclusions reasonable in light of this information?

We ask that you please provide your comments no later than **February 28, 2018**. We recognize that this is a short period of time. If you do not have enough time to review the entire document, we suggest that you focus your review on those portions that pertain to your area of expertise. If you are willing to review but are unable to complete your assessment during this time period, please let us know when we may anticipate receiving your comments.

Please note that all comments or any other data and information submitted to us will become part of the decisional file and may be released to the public.

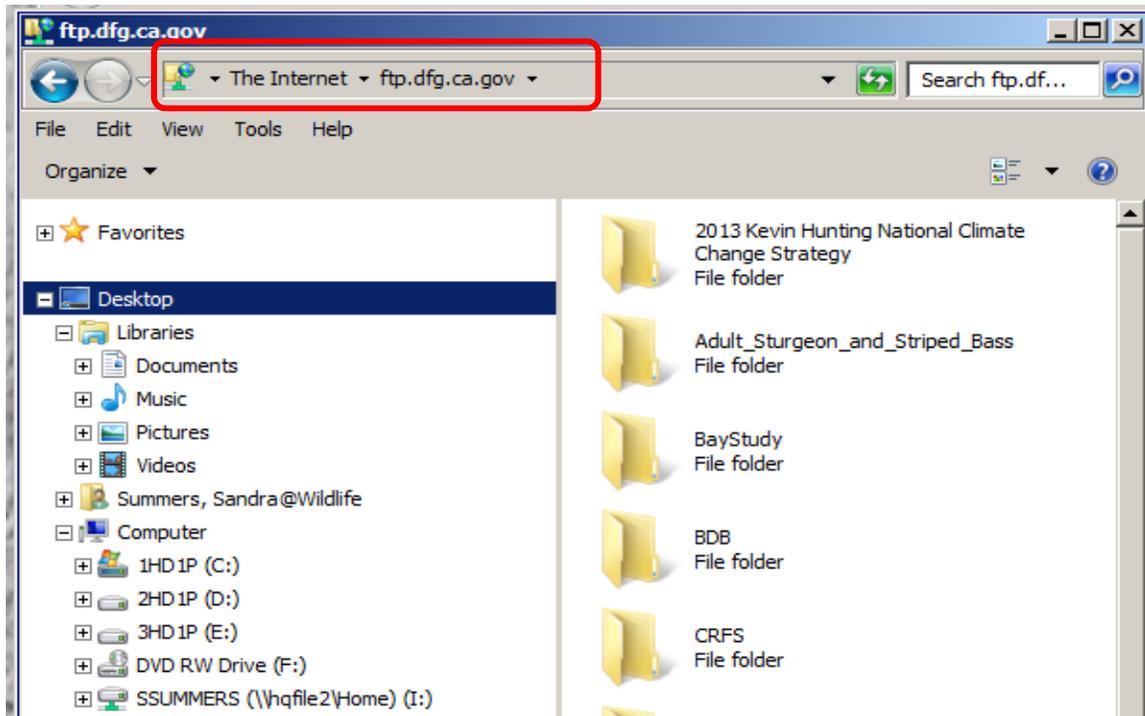
If you have any questions, please contact Chris Kofron at the Ventura Fish and Wildlife Office. Please submit your comments via email to Chris at chris_kofron@fws.gov or via hard copy to 2493 Portola Road Suite B, Ventura CA 93003.

Thank you very much for your contributions to our assessment.

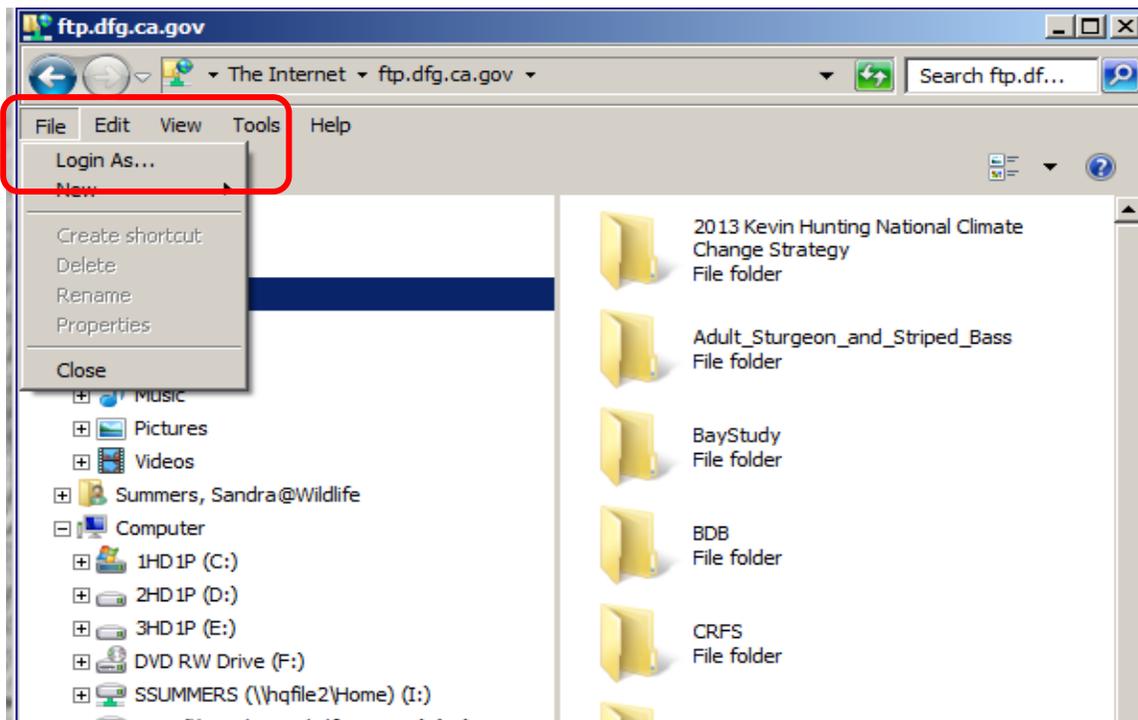
Sincerely,
Cat

Catherine R. Darst, Ph.D.
Assistant Field Supervisor: Listing & Recovery
Ventura Fish and Wildlife Office
2493 Portola Road Suite B
Ventura, CA 93003
(805) 677-3318

1. Open Windows Explorer and paste <ftp://ftp.dfg.ca.gov> into the file path bar and press enter.



2. On the menu bar, click **File->Login as...**



If you do not see the menu bar in Windows Explorer press the ALT key.

3. Enter this username and password

Username: BIOS_User

Password: VJY1eB:)

4. Add/remove files/folders to site by dragging into folder

Comments on SSA for La Graciosa thistle (Kristi Lazar, lead botanist with CNDDDB, Feb 2018):

I spent the time I had available to comment on the SSA for La Graciosa thistle concentrating on the portions that referenced CNDDDB. Mainly Table 1 and 2 and Appendix A. Comments are organized by occurrence number.

Occurrence #1:

-The reference Smith 1983. I think this should be 1982 if it is the same report we have at CNDDDB with the code of SMI82U0002. Table 2 also has this as 0 plants in 1983 but I think the surveys were performed between July 1981 and June 1982.

Occurrence #2 & #3:

-Table 1 indicates Year Last Seen for occurrence #2 and #3 is 1986 but CNDDDB has 1989. 1986 was the last year with a population size estimate.

Occurrence #6:

-It might be good to explain where the 106,000 plant number in 1990 came from in the text of Appendix A. Maybe say that in 1990 106,002 plants were estimated (54,002 flowering, and an estimated additional 52,000 vegetative plants). The number threw me since the table in the original source just uses 54,000 and you have to dig into the text of the report to get the 106,002. I will correct this in CNDDDB as well (we have 54,000 for pop estimate).

Occurrence #8 & #9:

- Table 2 has a positive sighting for 1980 for both occurrence #8 and #9 however I think the information was communicated by McLeod on 12/8/1980 but the plants were not necessarily seen in 1980. They may have been seen in 1980 but it is just as likely that the plants were seen in the 1970s. It is probably fine to leave the 1980 positive sighting in the table but it warrants further explanation in Appendix A (Page 69) that McLeod reported in 1980 that he saw plants at these locations but exact date of the observation is not known.

Occurrence #10:

-Table 2 and Appendix A mention that Howald observed 10 plants in 1981 but our data says 1-10 plants.

Occurrence #11:

-We also have a 1958 collection attributed here; this could be added to Table 2

-Table 2 says 24 plants but CNDDDB has 1-10 plants in each of 4 spots in 1981. I would rather see a range provided (i.e. 4-40 plants in 1981) since 24 plants makes this sound like a precise count when in reality it was a range given. Same with the 1984 numbers which are given in the SSA as 31 plants but in

reality is 10-50 plants; 31 plants sounds very specific. These numbers are also mentioned in Appendix A and in the text on page 17.

Occurrence #12:

-Table 2 and Appendix A say 31 plants observed in 1981; CNDDDB has 11-50 plants.

Occurrence #13

-Table 2 has a positive sighting for 1980 however I think the information was communicated by McLeod on 12/8/1980 but the plants were not necessarily seen in 1980. They may have been seen in 1980 but it is just as likely that the plants were seen in the 1970s. It is probably fine to leave the 1980 positive sighting in the table but it warrants further explanation in Appendix A (Page 72) that McLeod reported in 1980 that he saw plants at these locations but exact date of the observation is not known. Appendix A also indicates that the 1980 observation was made by Randy McCoy in 1980 but then references McLeod 1980; I'm guessing this is an error but I don't have the original McCoy report so I cannot verify that. McCoy 1980 seems to be for "occurrence #34" and not occurrence #13.

Occurrence #16

-CNDDDB has this one deleted as a mis-ID based on Hendrickson's note in her 1990 report for The Nature Conservancy. If you want to leave this one separate in the SSA, I would at least suggest a note in Appendix A under Occurrence #16 that this occurrence is no longer in CNDDDB and is considered a mis-ID.

-If you keep this occurrence in Table 2, I would remove the X from 1970 since that is just a reference to the publication date of the book *The Vascular Plants of San Luis Obispo County* and is not an observation date. You also have "0" for 1983 but 1983 is the only positive sighting with 11-50 plants observed in 1983 by Turner (documented by TUR83F0002). However, since the Turner collection was subsequently re-identified as *C. brevistylum*, these population numbers are not really valid for *C. scariosum* var. *loncholepis*.

Occurrence #30

-Table 1 indicates that the year last seen for occurrence #30 is 1975 but CNDDDB has this as 1967. Appendix A also uses the date of 1967.

Occurrence #34

-I would reference this as a new occurrence since right now CNDDDB does not have an occurrence #34. We also need the reference **McCoy 1980** in order to map it into CNDDDB.

Possible new location A

-CNDDDB has this attributed to EO #13 and would not map it as a new occurrence due to its proximity to an existing occurrence and vague location information.

Possible new location B

-CNDDDB has this attributed to EO #11. Part of our polygon for occurrence #11 extends to the north side of White Lake so it was attributed to that occurrence.

References from SSA for La Graciosa thistle that CNDDDB would like to have (references in red are higher priority):

Kisner D. 2009. Re: La Graciosa thistle habitat assessment and evaluation of the proposed 2008 critical habitat designation of the Las Flores Ranch portion of the Cañada de Las Flores Unit. Letter dated 27 March 2009 to Erik Vasquez, Solvang, California. 4 pages.

Thornton R.D. 2008. Comment on proposed rule for revised designation of critical habitat for *Cirsium loncholepis* (73 Fed. Reg. 45,806 (Aug. 6, 2008)). Letter from Robert D. Thornton, Nossaman LLP, Irvine California, to U.S. Fish and Wildlife Service, Arlington, Virginia. 30 pages.

-These are references for CNDDDB occurrence #2 and #3

Padre Associates, Inc. 2017. 2016 status report: California Department of Fish and Wildlife mitigation monitoring and reporting program, Guadalupe Remediation and Restoration Project, San Luis Obispo County, California. Guadalupe, California. 48 pages.

Lea M.E. 2002. The population dynamics and demography of two populations of La Graciosa thistle (*Cirsium loncholepis*). California Polytechnic State University, San Luis Obispo. Unpublished M.S. thesis. 108 pages.

Teed T. 2003. Ecology and population demography of La Graciosa thistle (*Cirsium loncholepis*). California Polytechnic State University, San Luis Obispo. Unpublished M.S. thesis. 82 pages.

-These are references for CNDDDB occurrence #6 and #18

Kelly M. 2013. Rancho Guadalupe Dunes *Cirsium*. Two emails from Melissa Kelly, Rancho Guadalupe Dunes County Park, Guadalupe, California, to Mark Elvin, U.S. Fish and Wildlife Service, Ventura, California. 6 August 2013. 8 pages.

Kelly M. 2015. *Cirsium loncholepis* at Rancho Guadalupe Dunes Preserve. Two emails from Melissa Kelly, Rancho Guadalupe Dunes County Park, Guadalupe, California, to Mark Elvin, U.S. Fish and Wildlife Service, Ventura, California. 5 and 8 May 2015. 7 pages.

Kelly M. 2017. Re: two questions: La Graciosa thistle in Rancho Guadalupe Dunes County Park. Email from Melissa Kelly, Rancho Guadalupe Dunes County Park, Guadalupe, California, to Chris Kofron, U.S. Fish and Wildlife Service, Ventura, California. 21 June 2017. 4 pages.

-These are references for CNDDDB occurrence #6

MIG/TRA Environmental Sciences, Inc. 2016. Habitat conservation plan for the California Department of Parks and Recreation Oceano Dunes District. Third Administrative Draft. Prepared for California State Parks Off-Highway Motor Vehicle Recreation Division, Oceano Dunes District, Pismo Beach. San Jose, California. 358 pages.

-This is a reference for CNDDDB occurrence #8 & #9

Skinner M. 2017a. La Graciosa thistle and occurrence 30. Information from Mark Skinner, Oceano Dunes State Vehicular Recreation Area, to Chris Kofron, U.S. Fish and Wildlife Service, Ventura, California. 6 June 2017. 1 page.

-This is a reference for CNDDDB occurrence #8, #9, and #30

Chestnut J. 1998c. Reconnaissance survey for rare plants on the Oceano Dunes SVRA. Prepared for California State Parks Off-Highway Vehicle Division, Oceano Dunes State Vehicular Recreation Area. 28 September 1998. Los Osos, California. 86 pages.

Skinner M. 2017b. La Graciosa thistle at Surprise Lake. Information from Mark Skinner, Oceano Dunes State Vehicular Recreation Area, to Chris Kofron, U.S. Fish and Wildlife Service, Ventura, California. 21 March 2017. 1 page.

-These are references for CNDDDB occurrence #12

Elvin M.A. 2017c. Re: occurrence 28: LGT in Guadalupe, search in 2009 and 2012? Email from Mark Elvin to Chris Kofron, both of U.S. Fish and Wildlife Service, Ventura, California. 25 July 2017. 26 pages.

-This is a reference for CNDDDB occurrence #28

Chestnut J. 1998b. Comments on the proposed rule for *Lupinus nipomensis* and *Cirsium loncholepis*. Letter to U.S. Fish and Wildlife Service on proposed rule for *Lupinus nipomensis* and *Cirsium loncholepis*. 5 pages.

U.S. Fish and Wildlife Service [USFWS]. 2016. Guadalupe-Nipomo Dunes National Wildlife Refuge: final comprehensive conservation plan and environmental assessment. Sacramento, California. 94 pages.

-These are references for CNDDDB occurrence #31

Langford J. 2017b. Re: status at the entrance wetlands. Email from Jenny Langford, Padre Associates, Inc., Guadalupe, California, to Chris Kofron, U.S. Fish and Wildlife Service, Ventura, California. 22 May 2017. 5 pages.

-This is a reference for CNDDDB occurrence #32

McCoy R.J. 1980. Analysis of off-road vehicle damage: distribution and status of endangered native vascular plants, Nipomo Dunes, California, January 1977-March 1980. California Polytechnic State University, San Luis Obispo. 94 pages.

-This is a reference for CNDDDB "occurrence #34"

Other references that would be nice to have but are not essential:

Elvin M.A. 2007b. Field notes of site visit to Vandenberg Air Force Base with observations for EO 1. Personal observations by Mark Elvin, U.S. Fish and Wildlife Service, Ventura, California. 25 November 2007. 8 pages.

Keil D.J., and V.L. Holland. 1998. Documented flora of Vandenberg Air Force Base, Santa Barbara County, California. Report prepared for the Nature Conservancy, San Luis Obispo, California, and Vandenberg Air Force Base, California. California Polytechnic State University, San Luis Obispo. 96 pages.

Oyler L.D., V.L. Holland, and D.J. Keil. 1995. Rare plants of Vandenberg Air Force Base. California Polytechnic State University, San Luis Obispo. 134 pages.

-These are references for CNDDDB occurrence #1

Chris Kofron

From: Lazar, Kristi@Wildlife
Sent: Friday, April 13, 2018 11:09 AM
To: 'Chris_Kofron@fws.gov'
Cc: Nelson, Misty@Wildlife
Subject: [EXTERNAL] La Graciosa thistle
Attachments: SSALaGraciosaThistle_KLComments_201804.docx

Hi Chris,

I have finally finished going through all of the documents you sent me on La Graciosa thistle as well as the status review document. I have incorporated all of that information into CNDDDB. I re-attached my comments on the status review document with a few additional notes in red text that I noticed when I went through everything in more detail. I mostly kept these notes for myself while I was updating the species so I could keep track of discrepancies between the status review and CNDDDB but thought I would forward them to you as well.

One major change was that I included occurrence #9 within occurrence #8 (so there is no longer an occurrence #9). Our mapping was previously based on a black and white copy of the 1998 Chestnut report but the version you sent me had color maps so I could make out an additional colony that was not visible on our black and white copy. Another change was that I added new occurrences #34 and #35 which were sites that you included within occurrence #6. It is very possible that they are just extensions of occurrence #6 but as of right now, they are more than ¼ mi from that occurrence and I don't think there is enough support to say the *Cirsium* plants occur continuously between the sites.

I also re-added occurrence #16. I am still highly suspect about the validity of this occurrence but I emailed with Dave Keil and he indicated that Hoover was a careful observer and would place considerable value on Hoover's statements. I included notes in the occurrence record that it may be a mis-ID or if valid is likely extirpated.

Hopefully you find this information helpful. All the updated information will be in the May update of RareFind. Next, I will work on updating our information on the Indian Knob mountainbalm; I don't think it will take me as long to update since there are only 6 occurrences for that species.

-Kristi

Kristi Lazar, Lead Botanist
California Natural Diversity Database (CNDDDB)
Department of Fish and Wildlife
Mailing address: P.O. Box 944209, Sacramento, CA 94244-2090
E-mail: Kristi.Lazar@wildlife.ca.gov
Phone: (916) 327-6292

Comments on SSA for La Graciosa thistle (Kristi Lazar, lead botanist with CNDDDB, Feb 2018).

Additional comments in red text made, April 2018):

I spent the time I had available to comment on the SSA for La Graciosa thistle concentrating on the portions that referenced CNDDDB. Mainly Table 1 and 2 and Appendix A. Comments are organized by occurrence number.

Occurrence #1:

-The reference Smith 1983. I think this should be 1982 if it is the same report we have at CNDDDB with the code of SMI82U0002. Table 2 also has this as 0 plants in 1983 but I think the surveys were performed between July 1981 and June 1982.

-Table 1 indicates negative surveys for 1995 and 1998. I think those documents are not necessarily negative surveys but are the years the document were put together. I don't see anywhere in those two documents that say surveys for *Cirsium* were performed in 1995 or 1998.

Occurrence #2 & #3:

-Table 1 indicates Year Last Seen for occurrence #2 and #3 is 1986 but CNDDDB has 1989. 1986 was the last year with a population size estimate.

Occurrence #6:

-It might be good to explain where the 106,000 plant number in 1990 came from in the text of Appendix A. Maybe say that in 1990 106,002 plants were estimated (54,002 flowering, and an estimated additional 52,000 vegetative plants). The number threw me since the table in the original source just uses 54,000 and you have to dig into the text of the report to get the 106,002. I will correct this in CNDDDB as well (we have 54,000 for pop estimate).

-I looked more closely and I think the total is 54,000 flowering plants, not 106,002. The table in the original source says 54,000 flowering plants. The text in Appendix A says 52,000 flowering plants plus an additional 2002 flowering plants which when added together is probably where the 54,000 total plant count came from.

-I get slightly different population numbers for 2006-2016 (numbers based on the Padre Associates report). I think the numbers for Table 3 in the Padre Associates report line up with three different occurrences. Location W-R1 & W-R2 looks to be occurrence #32. N-12, L-11, M-12, N-12 restoration, and M-2 appear to be for occurrence #18 and everything else I used for occurrence #6. It looks like for your occurrence #6 numbers in Table 2 of your report, you used the combined numbers of occurrence #6 and #32.

-Table 1 has an X for 1998 and the reference is footnote 42. Footnote 42 is "Huber 2001, entire". CNDDDB's 2001 Huber field survey form is only for 2001; it doesn't mention 1998.

-New CNDDDB occurrences #34 and #35 were included within occurrence #6 in your report. Occurrence #34 is based on your Elvin 2006 and Elvin 2017a documents. Occurrence #35 is based on your Kelly 2015 document.

Occurrence #8 & #9:

- Table 2 has a positive sighting for 1980 for both occurrence #8 and #9 however I think the information was communicated by McLeod on 12/8/1980 but the plants were not necessarily seen in 1980. They may have been seen in 1980 but it is just as likely that the plants were seen in the 1970s. It is probably fine to leave the 1980 positive sighting in the table but it warrants further explanation in Appendix A (Page 69) that McLeod reported in 1980 that he saw plants at these locations but exact date of the observation is not known.

-I ended up including occurrence #9 within occurrence #8 based on my revised mapping in which all spatial information is within ¼ mile. Mapping was based on mostly on 1998 Chesnut report; previously CNDDDB did not have a color version of the maps so certain populations were not visible but with the version you sent me, I was able to add an additional polygon not visible in our photo copy.

-There is also a 1979 sighting from Ann Howald that was not included in Table 2. 30 plants found on the edge of Jacks Lake in 1979.

Occurrence #10:

-Table 2 and Appendix A mention that Howald observed 10 plants in 1981 but our data says 1-10 plants.

Occurrence #11:

-We also have a 1958 collection attributed here; this could be added to Table 2

-Table 2 says 24 plants but CNDDDB has 1-10 plants in each of 4 spots in 1981. I would rather see a range provided (i.e. 4-40 plants in 1981) since 24 plants makes this sound like a precise count when in reality it was a range given. Same with the 1984 numbers which are given in the SSA as 31 plants but in reality is 10-50 plants; 31 plants sounds very specific. These numbers are also mentioned in Appendix A and in the text on page 17.

Occurrence #12:

-Table 2 and Appendix A say 31 plants observed in 1981; CNDDDB has 11-50 plants.

Occurrence #13

-Table 2 has a positive sighting for 1980 however I think the information was communicated by McLeod on 12/8/1980 but the plants were not necessarily seen in 1980. They may have been seen in 1980 but it is just as likely that the plants were seen in the 1970s. It is probably fine to leave the 1980 positive sighting in the table but it warrants further explanation in Appendix A (Page 72) that McLeod

reported in 1980 that he saw plants at these locations but exact date of the observation is not known. Appendix A also indicates that the 1980 observation was made by Randy McCoy in 1980 but then references McLeod 1980; I'm guessing this is an error but I don't have the original McCoy report so I cannot verify that. McCoy 1980 seems to be for "occurrence #34" and not occurrence #13.

Occurrence #16

~~-CNDDDB has this one deleted as a mis-ID based on Hendrickson's note in her 1990 report for The Nature Conservancy. If you want to leave this one separate in the SSA, I would at least suggest a note in Appendix A under Occurrence #16 that this occurrence is no longer in CNDDDB and is considered a mis-ID.~~

~~-If you keep this occurrence in Table 2, I would remove the X from 1970 since that is just a reference to the publication date of the book The Vascular Plants of San Luis Obispo County and is not an observation date. You also have "0" for 1983 but 1983 is the only positive sighting with 11-50 plants observed in 1983 by Turner (documented by TUR83F0002). However, since the Turner collection was subsequently re-identified as *C. brevistylum*, these population numbers are not really valid for *C. scariosum* var. *loncholepis*.~~

-I have re-added occurrence #16 to CNDDDB.

Occurrence #30

-Table 1 indicates that the year last seen for occurrence #30 is 1975 but CNDDDB has this as 1967. Appendix A also uses the date of 1967.

Occurrence #34

-I would reference this as a new occurrence since right now CNDDDB does not have an occurrence #34. We also need the reference **McCoy 1980** in order to map it into CNDDDB.

-I mapped this around Lettuce Lake and it is part of occurrence #20, not a new occurrence.

-I added Elvin's 2017 screen shot as new occurrence #34. This is a site you included within occurrence #6 of your report.

Possible new location A

-CNDDDB has this attributed to EO #13 and would not map it as a new occurrence due to its proximity to an existing occurrence and vague location information.

Possible new location B

-CNDDDB has this attributed to EO #11. Part of our polygon for occurrence #11 extends to the north side of White Lake so it was attributed to that occurrence.

From: [Tom Olson](#)
To: [Chris Kofron](#)
Subject: RE: question: Comments on 2018 Draft Species Status Assessment for the La Graciosa Thistle
Date: Thursday, March 15, 2018 10:29:14 AM

Hi Chris,

I checked the pages again – Table 5 vs. information about Occurrence 32 in Appendix A (Page 76 of 78). See the statement below taken from that page:

Langford (2017b, p. 3) identified the threats as drought, wetland drying, groundwater decline, and invasive plants (Italian plumeless thistle (*Carduus pycnocephalus*), ripgut brome, foxtail fescue (*Vulpia myuros*)).

The comment appears to be specific to Occurrence 32. Part of my comment was incorrect. Jenny did not cite uncontrolled grazing. However she did cite invasive plants as one of the threats to Occurrence 32. That is not marked in Table 5 as one of the threats at Occurrence 32.

Please let me know if you have other questions.

Tom

From: Chris Kofron [mailto:chris_kofron@fws.gov]
Sent: Tuesday, March 13, 2018 3:56 PM
To: Tom Olson <tolson@garciaandassociates.com>
Subject: question: Comments on 2018 Draft Species Status Assessment for the La Graciosa Thistle

Hello, Tom.

We're considering your comments now, and we don't understand your comment 12.

12. Table 5 – Two threats that are discussed in Appendix A of the report, uncontrolled grazing and invasive species (cited by Jenny Langford, Padre), are not noted on Table 5.

Please would you explain.

Table 5. The threats to La Graciosa thistle (*Cirsium scariosum* var. *loncholepis*) in 2017.

Threats in 2017	Occurrence																																							
	1	2	3	4	6	8	9	10	11	12	13	14	16	18	19	20	28	30	31	32	33	34																		
Groundwater depletion	X				X	X	X	X	X	X			X	X		X		X	X	X															X					
Agriculture	X	X	X	X	X										X																									
Development	X			X									X																											
Hydrological alteration				X	X							X																												
Uncontrolled grazing			X		X																																			
Invasive species					X					X	X		X																											
Vegetation management													X																											
Dead vegetation altering habitat								X	X	X	X																													
Flooding					X																																			
Habitat disturbance by feral pigs												X																												
Herbivory												X																												
Off road vehicles																																								
Road and ditch maintenance																																								
Drought	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Climate change	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Stochastic events	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	

Looking forward to your response, thanks.

Sincerely,

Chris Kofron
 Senior Biologist and Recovery Permit Coordinator
 U.S. Fish and Wildlife Service
 2493 Portola Rd., Suite B
 Ventura, CA 93003

tel. (805) 677-3336
 fax (805) 644-3958
chris_kofron@fws.gov

PLEASE NOTE: Our office telephone numbers have changed. You may still reach our general number at (805) 644-1766 or you may contact me directly at (805) 677-3336.

From: Tom Olson [mailto:tolson@garciaandassociates.com]
Sent: Friday, March 2, 2018 11:30 AM
To: 'Chris Kofron' <Chris_Kofron@fws.gov>
Cc: Cat Darst <cat_darst@fws.gov>
Subject: Comments on 2018 Draft Species Status Assessment for the La Graciosa Thistle

Hi Chris,

Please find attached my comments on the 2018 Draft Species Status Assessment for the La Graciosa Thistle (*Cirsium scariosum* var. *loncholepis* [*Cirsium loncholepis*]). Thank you for your patience. I enjoyed reviewing the status review and appreciate the efforts you and other USFWS staff have devoted to this status review. Please call me at (805) 717-1938 if you have questions.

Tom Olson
 Garcia and Associates
 1025 East Ocean Avenue, Suite C
 Lompoc, CA 93436



Garcia and Associates
1025 East Ocean Avenue, Suite C
Lompoc, CA 93436
Phone: (805) 740-1946
Fax: (805) 740-2046

To: Chris Kofron, U.S. Fish and Wildlife Service

Copy: Cat Darst, U.S. Fish and Wildlife Service

From: Tom Olson, Garcia and Associates

Date: March 2, 2018

Re: Comments on the 2018 Draft Species Status Assessment for the La Graciosa Thistle (*Cirsium scariosum* var. *loncholepis* [*Cirsium loncholepis*])

Chris,

Thank you for the opportunity to comment on the Species Status Assessment for La Graciosa thistle

(*Cirsium scariosum* var. *loncholepis* [*Cirsium loncholepis*]). It has an impressive amount of information that is presented in a systematic and easily understood manner. It's obvious that a great deal of work went into the preparation of this document. In your cover email of January 31, 2018, you provided the following questions to aid my review. You also indicated the questions should not constrain my review. I offer the following comments, starting with responses to the questions provided.

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

I believe you have utilized the best available scientific and commercial information. I am not a botanist, but it appears you have consulted all the sources I would as a biological consultant. In particular, your efforts to track down the current status of all the LGT entries in the California Natural Diversity Data Base should be applauded. I suggest the report might benefit from a succinct Methods section to allow readers to quickly assess the extent of your efforts.

2. Is our analysis of this information correct?

Overall, your analysis is correct. I think the review of the species in terms of resiliency, representation, and redundancy is quite valuable to look at possible outcomes in the

decades to follow. The analysis puts the current status in perspective and provides the basis for assessing the three management scenarios over the next 50 years that you present. In the three short paragraphs below I offer some thoughts specific to the analysis of information about the occurrences completely or partially on Chevron property.

As the Ecological Coordinator for Chevron's Guadalupe Restoration Project at the former Guadalupe Oil Field, I am familiar with the LGT occurrences wholly or partially on Chevron property. For those occurrences/partial occurrences, you may have overstated the current threat of oilfield remediation. You would be remiss to not cite the threat of "continuing energy-related activities (maintenance, hazardous waste cleanup)" from the USFWS (2000) listing rule, but Chevron has mitigated that threat via actions consistent with terms and conditions of the Biological Opinion for that project (see my specific comment 6 below).

While uncontrolled grazing is a possible threat to the 78% of Occurrence 6 not on Chevron property, grazing is disallowed on the other 22% (on Chevron property). This disallowance might continue into the future. See my specific comment 10 below.

3. Are our scientific conclusions reasonable in light of this information?

The scientific conclusions appear to be reasonable. The likely outcomes of the three scenarios seem realistic. Unfortunately, LGT is a species with few extant occurrences and while recovery is possible, it will be a challenge.

My specific comments follow.

1. Pg. 3, paragraph 4, line 1 – "range" should be "ranged."
2. Pg. 7, paragraph 4 under **Life History**, line 3 – "populations dynamics" should be "population dynamics."
3. Pg. 7, paragraph 4 under **Life History**, line 4 – "at mouth" should be "at the mouth."
4. Pg. 9, paragraph 2, line 5 – A sentence in line 5 begins with "The 22 occurrences..." At times, it is difficult to keep track of which set of occurrences are being discussed (the 22 that were known to exist at one time, the 12 followed up on, or the 5 that remain extant). In the example just given, Tables 1 and 3 are referenced, which helps; however, adding descriptors, such as "The 22 historic occurrences" would add more clarification, even if it seems to make the text more wordy.
5. Discussion of threats includes depletion of groundwater exacerbated by drought. Have you looked into comparisons to loss or contraction of wetlands along the Central California Coast during the drought years of 2011-12 through 2015-2016 to gauge the effects of the most recent drought?
6. Page 11, paragraph 1 under "Threats to La Graciosa Thistle," lines 2 and 3 – You cite from the USFWS (2000) listing rule that one of the threats to this species is "continuing energy-related activities (maintenance, hazardous waste cleanup)". Much of the cleanup on Chevron's land has been completed, with some remaining. Measures taken by Chevron to minimize adverse effect to LGT during the cleanup have been effective. In addition, mitigation measures implemented consistent with terms and conditions of the Biological Opinion have included

- replacement of LGT affected by remediation activities at a 2:1 ratio. Thus, although energy-related activities are a threat to LGT, on Chevron property the threat has been minimized.
7. Page 12, line 1 under the heading “Dune Lakes” – minor point, but Oceano is not an incorporated city. It’s an unincorporated community.
 8. Page 15, top paragraph, line 8 – For clarification, Well 35W-A1 is not a water well, but rather a piezometer, similar to a groundwater monitoring well. It is used only for gauging groundwater elevations and not for water production or water sampling. No water is extracted from the ground via 35W-A1. It is not located on Chevron property.
 9. Page 16, bullet point 4 under “Conservation Measures for La Graciosa Thistle” – It would probably be more accurate to state that Chevron is “managing” or “reducing” or “removing” invasive plants. While the objective of the veldt grass management is to eradicate it that may never completely happen. It is a very pernicious species that persists despite very intensive removal measures.
 10. Page 17, paragraph 4 under “Resiliency” – It should be noted for the 22% of Occurrence 6 on Chevron property, there is no cattle grazing allowed and the disallowance is likely to continue. It is unlikely that crop production will be a threat to that portion of the occurrence because the Chevron property is to go into conservation use following completion of remediation activities.
 11. Page 20, last paragraph on the page, lines 6-11 – Some level of protection for Occurrences 6 (in part), 18, and 32 (in part) might after Chevron ownership. The land is to go into conservation use and not development.
 12. Table 5 – Two threats that are discussed in Appendix A of the report, uncontrolled grazing and invasive species (cited by Jenny Langford, Padre), are not noted on Table 5.
 13. The report defines the threats to LGT as “extensive loss of habitat, continuing energy-related activities (maintenance, hazardous waste cleanup) that modify habitat in the Guadalupe Dunes, commercial development in the Guadalupe Dunes, hydrological alterations (including groundwater extraction in and near the Guadalupe Dunes), uncontrolled cattle grazing in the Guadalupe Dunes and along the Santa Maria River, and invasive species.” The report also states that past development and agriculture has resulted in habitat loss for LGT.

Based on the above definitions the following threats listed on Table 5 (page 46) should be further clarified as there appears to be some overlap:

- Groundwater depletion – This threat includes groundwater extraction for development, agriculture and industrial uses.
- Hydrological alteration – This threat also includes groundwater extraction.
- Agriculture – It’s not clear if this threat includes groundwater extraction for agriculture or if this is only for land disturbance from past agricultural activities.
- Development – It’s not clear if this threat includes groundwater extraction for land development or if this is only referencing disturbance from past development.

14. The tables and figures should both be in separate appendices and these appendices (including Appendix A) should be listed in the Table of Contents.

Again, thank you for the opportunity to comment on this status review of LGT, as well as for your time and effort to produce this report. Please call me if you have questions.

Tom Olson
Garcia and Associates
1025 East Ocean Avenue, Suite C
Lompoc, CA 93436
(805) 717-1938

From: Mark Skinner [mailto:mkskinner@coastalrcd.org]
Sent: Friday, February 9, 2018 7:56 AM
To: Chris Kofron <chris_kofron@fws.gov>
Subject: Re: Request for Partner Review - La Graciosa Thistle

Hi Chris,

Thank you for sending the LGT review copy. One thing: would you please crop or replace the picture of me on page 56 of 78. I look fat!

Thanks,

-Mark

--

Mark Skinner
Restoration Specialist II
Coastal San Luis Resource Conservation District
(805) 235-3977

On Wed, Jan 31, 2018 at 9:00 AM, Chris Kofron <chris_kofron@fws.gov> wrote:
Dear Mark,

The U.S. Fish and Wildlife Service (Service) is soliciting review of the information contained in our 2018 Draft Species Status Assessment for the La Graciosa Thistle (*Cirsium scariosum* var. *loncholepis* [*Cirsium loncholepis*]). This analysis will provide the foundation for development of a recovery plan for the species. Please see attached. We value your input and are seeking your comments as part of our evaluation process.

A Species Status Assessment (SSA) is an internal Service document that provides a scientifically rigorous characterization of the species' biological and conservation status, focusing on the likelihood of whether the species will sustain populations while also explicitly acknowledging uncertainties in that characterization. Please let us know if you would like us to provide any of the referenced materials to help facilitate your review.

We are providing this draft SSA Report for your agency review. We will review your comments and incorporate them into the SSA, where appropriate, prior to finalizing the document. Please note that the Service is not seeking advice on policy or recommendations on the legal status of the species. Rather, the Service requests that you focus your review on the accuracy of the biological information. The following questions are provided to aid, but not constrain, your review:

1. Have we assembled and considered the best available scientific and commercial information relevant to this species?
2. Is our analysis of this information correct?
3. Are our scientific conclusions reasonable in light of this information?

We ask that you please provide your comments no later than **February 28, 2018**. We recognize that this is a short period of time. If you do not have enough time to review the entire document, we suggest that you focus your review on those portions that pertain to your area of expertise. If you are willing to review but are unable to complete your assessment during this time period, please let us know when we may anticipate receiving your comments.

Please note that all comments or any other data and information submitted to us will become part of the decisional file and may be released to the public.

If you have any questions, please contact me at the Ventura Fish and Wildlife Office. Please submit your comments via email to me at chris_kofron@fws.gov or via hard copy to 2493 Portola Road Suite B, Ventura CA 93003.

Thank you very much for your contributions to our assessment.

Sincerely,
Chris Kofron
Senior Biologist and Recovery Permit Coordinator
U.S. Fish and Wildlife Service
2493 Portola Rd., Suite B
Ventura, CA 93003

tel. [\(805\) 677-3336](tel:(805)677-3336)
fax [\(805\) 644-3958](tel:(805)644-3958)
chris_kofron@fws.gov

PLEASE NOTE: Our office telephone numbers have changed. You may still reach our general number at [\(805\) 644-1766](tel:(805)644-1766) or you may contact me directly at [\(805\) 677-3336](tel:(805)677-3336).

Chris Kofron

From: Darst, Cat
Sent: Tuesday, March 13, 2018 9:05 AM
To: Chris Kofron
Subject: Fwd: Request for Peer Review - La Graciosa Thistle
Attachments: conflict of interest form.pdf

Please see below and attached.

----- Forwarded message -----

From: Picco, Angela <angela_picco@fws.gov>
Date: Mon, Mar 12, 2018 at 10:50 AM
Subject: Fwd: Request for Peer Review - La Graciosa Thistle
To: "Darst, Cat" <cat_darst@fws.gov>

Angela Picco, Ph.D.
Deputy Division Chief of Listing and Recovery
Pacific Southwest Regional Office, Region 8
U.S. Fish and Wildlife Service
2800 Cottage Way, Room W-2606
Sacramento, CA 95825
(916) 414-6490

----- Forwarded message -----

From: Nordin, Erin <erin_nordin@fws.gov>
Date: Wed, Feb 28, 2018 at 1:16 PM
Subject: Fwd: Request for Peer Review - La Graciosa Thistle
To: "Picco, Angela" <angela_picco@fws.gov>

Hi Angela,

While you were out I sent out a request for peer review of the La Graciosa Thistle. Here are the comments I received.

Erin

----- Forwarded message -----

From: Jennifer Langford <jangford@padreinc.com>
Date: Wed, Feb 28, 2018 at 12:38 PM
Subject: RE: Request for Peer Review - La Graciosa Thistle
To: "Nordin, Erin" <erin_nordin@fws.gov>

Attached is the conflict of Interest Disclosure Form. Follows are some minor edits or suggestions provided from Chevron:

- Provide on figure showing all occurrences mentioned in report
- Pg. 3, paragraph 4, line 1 – “range” should be “ranged.”
- Pg. 7, paragraph 4 under **Life History**, line 3 – “populations dynamics” should be “population dynamics.”
- Pg. 7, paragraph 4 under **Life History**, line 4 – “at mouth” should be “at the mouth.”
- Pg. 9, paragraph 2, line 5 – A sentence in line 5 begins with “The 22 occurrences...” At times, it is difficult to keep track of which set of occurrences are being discussed (the 22 that were known to exist at one time, the 12 followed up on, or the 5 that remain extant). In the example just given, Tables 1 and 3 are referenced, which helps; however, adding descriptors, such as “The 22 historic occurrences” would add more clarification, even if it seems to be to make the text more wordy.
- Discussion of threats includes depletion of groundwater exacerbated by drought. Have you looked into comparisons to loss or contraction of wetlands along the Central California Coast during the drought years of 2011-12 through 2015-2016 to gauge the effects of the most recent drought?
- Page 12, line 1 under the heading “Dune Lakes” – minor point, but Oceano is not an incorporated city. It’s an unincorporated community.
- Page 16, bullet point 4 under “Conservation Measures for La Graciosa Thistle” – It would probably be more accurate to state that Chevron is “managing” or “reducing” of “removing” invasive plants. While the objective of the management of the veldt grass is to eradicate it that may never completely happen. It is a very pernicious species that persists despite very intensive removal measures.
- Page 16, first paragraph under the bulleted points – Legal protections and management of Occurrences 6, 18, and 32 will likely continue past Chevron’s remediation activity period. The site is to go into conservation, not development. As such, it could be managed by an agency, such as the U.S. Fish and Wildlife Service or a non-governmental organization (NGO).
- Page 17, paragraph 4 under “Resiliency” – It should be noted for the 22% of Occurrence 6 on Chevron property, there is no cattle grazing allowed and the disallowance is likely to continue. It is unlikely that crop production will be a threat to that portion of the occurrence because the Chevron property is to go into conservation use following completion of remediation activities.

From: Nordin, Erin [mailto:erin_nordin@fws.gov]

Sent: Monday, January 29, 2018 10:12 AM

To: Jennifer Langford <jlangford@padreinc.com>

Cc: Cat Darst <Cat_Darst@fws.gov>; Chris Kofron <Chris_Kofron@fws.gov>

Subject: Request for Peer Review - La Graciosa Thistle

Dear Ms. Langford:

The U.S. Fish and Wildlife Service (Service) is soliciting independent scientific reviews of the information contained in our 2018 Draft Species Status Assessment for the La Graciosa Thistle (*Cirsium scariosum* var. *loncholepis* [*Cirsium loncholepis*]). The Species Status Assessment (SSA) will serve as the foundation for the recovery plan for the species. You were identified by our Ventura Fish and Wildlife Office as a potential peer reviewer based on your area of expertise.

This request is provided in accordance with our July 1, 1994, peer review policy (USFWS 1994, p. 34270) and our current internal guidance. This request also satisfies the peer review requirements of the Office of Management and Budget’s “Final Information Quality Bulletin for Peer Review.” The purpose of seeking independent peer review of the SSA is to ensure use of the best scientific and commercial information available; to ensure and maximize the quality, objectivity, utility, and integrity of the information upon which we base recovery actions; and to ensure that reviews by recognized experts are incorporated into our final SSA. Please let us know if you would like us to provide any of the referenced materials to help facilitate your review.

Please note that we are not seeking advice on policy or recommendations on the legal status of the species. Rather, we request that peer

reviewers focus their review on identifying and characterizing scientific uncertainties, and on ensuring the accuracy of the biological information in the SSA. Specifically, we ask peer reviewers to focus their comments on the following:

1. Have we assembled and considered the best available scientific and commercial information relevant to this species?
2. Is our analysis of this information correct?
3. Are our scientific conclusions reasonable in light of this information?

Our updated peer review guidelines also require that all peer reviewers fill out a conflict of interest form. We will carefully assess any potential conflict of interest or bias using applicable standards issued by the Office of Government Ethics and the prevailing practices of the National Academy of Sciences (<http://www.nationalacademies.org/coi/index.html>). Divulging a conflict does not invalidate the comments of the reviewer; however, it will allow for transparency to the public regarding the reviewer's possible biases or associations. If we receive comments from a reviewer that we deem to have a substantial conflict of interest, we will evaluate the comments in light of those conflicts, and may choose not to give weight to those comments if the conflict is viewed as problematic. You may return the completed conflict of interest form either prior to or with your peer review.

We ask that you please provide your comments no later than **February 28, 2018**. We recognize that this is a short period of time. If you do not have enough time to review the entire document, we suggest that you focus your review on those portions that pertain to your area of expertise. If you are willing to peer review but are unable to complete your assessment during this time period, please let me know when we may anticipate receiving your comments. We will summarize and respond to the substantive comments raised by all peer reviewers and use the information, as appropriate, in the final SSA.

Please provide your written response to us by email or by letter. We would also appreciate receiving a copy of your Curriculum Vitae for our records. Please be aware that your completed review of the SSA, including your name and affiliation, will be included in the administrative record for this evaluation and will be available to interested parties upon request.

If you have any questions about the SSA, please feel free to contact Angela Picco at (916) 414-6490 or by email angela_picco@fws.gov. Please submit your comments and associated materials to the following address:

Angela Picco, Recovery Coordinator
Pacific Southwest Regional Office, Region 8
U.S. Fish and Wildlife Service
2800 Cottage Way, Room W-2606
Sacramento, CA 95825

Thank you for your consideration.

Erin Nordin

Acting for Angela Picco

--
Erin Nordin

Reno Fish and Wildlife Office
U.S. Fish and Wildlife Service
351 Pacu Lane
Bishop, California 93514
(760) 872-5020

Conflict of Interest Disclosure Form

Note: A potential or actual conflict of interest exists when commitments and obligations are likely to be compromised by the nominator(s)' other material interests, or relationships (especially economic), particularly if those interests or commitments are not disclosed.

This Conflict of Interest Form should indicate whether the nominator(s) has an economic interest in, or acts as an officer or a director of, any outside entity whose financial interests would reasonably appear to be affected by the addition of the nominated condition to the newborn screening panel. The nominator(s) should also disclose any personal, business, or volunteer affiliations that may give rise to a real or apparent conflict of interest. Relevant Federally and organizationally established regulations and guidelines in financial conflicts must be abided by. Individuals with a conflict of interest should refrain from nominating a condition for screening.

Date: 2-26-18

Name: JENNIFER LANGFORD

Position: SEAM SCIENTIST, PADRE ASSOC., GUADALUPE RESTORATION PROJECT

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest:

I have no conflict of interest to report.

I have the following conflict of interest to report (please specify other nonprofit and for-profit boards you (and your spouse) sit on, any for-profit businesses for which you or an immediate family member are an officer or director, or a majority shareholder, and the name of your employer and any businesses you or a family member own:

1. _____

2. _____

3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge.

Signature: _____

Jennifer Langford

Date: _____

2-26-18

Chris Kofron

From: Francis X. Villablanca
Sent: Monday, April 16, 2018 2:14 PM
To: Nordin, Erin
Cc: Cat Darst; Chris Kofron; Francis X. Villablanca
Subject: [EXTERNAL] Re: Request for Peer Review - La Graciosa Thistle
Attachments: Conflict of Interest Disclosure Form.pdf

Hi Erin,

I have looked over the genetics portion of the SSA for the LGT. I have nothing to add or edit. If I had any comments they would simply be about the phrasing rather than the content.

As far as I am aware, you have assembled and considered the best available information. Your analysis of the information seems correct. Thus, your scientific conclusions are quite reasonable, and they align with the known facts.

My COI form is attached.

Best, Francis

Francis Villablanca, Ph.D.
Professor, Biology Sciences, <http://bio.calpoly.edu/>
Coordinator Monarch Alert, <https://monarchalert.calpoly.edu/>
Cal Poly State University
San Luis Obispo, CA 93407
fvillabl@calpoly.edu
805-756-2200

From: Nordin, Erin <erin_nordin@fws.gov>
Sent: Monday, January 29, 2018 10:16 AM
To: Francis X. Villablanca
Cc: Cat Darst; Chris Kofron
Subject: Request for Peer Review - La Graciosa Thistle

Dear Dr. Villablanca:

The U.S. Fish and Wildlife Service (Service) is soliciting independent scientific reviews of the information contained in our 2018 Draft Species Status Assessment for the La Graciosa Thistle (*Cirsium scariosum* var. *loncholepis* [*Cirsium loncholepis*]). The Species Status Assessment (SSA) will serve as the foundation for the recovery plan for the species. You were identified by our Ventura Fish and Wildlife Office as a potential peer reviewer based on your area of expertise.

This request is provided in accordance with our July 1, 1994, peer review policy (USFWS 1994, p. 34270) and our current internal guidance. This request also satisfies the peer review requirements of the Office of Management and Budget's "Final Information Quality Bulletin for Peer Review." The purpose of seeking independent peer review of the SSA is to ensure use of the best scientific and commercial information available; to ensure and maximize the quality, objectivity, utility, and integrity of the information upon which we base recovery actions; and to ensure that reviews by recognized experts are incorporated into our final SSA. Please let us know if you would like us to provide any of the referenced materials to help facilitate your review.

Please note that we are not seeking advice on policy or recommendations on the legal status of the species. Rather, we request that peer reviewers focus their review on identifying and characterizing scientific uncertainties, and on ensuring the accuracy of the biological information in the SSA. Specifically, we ask peer reviewers to focus their comments on the following:

1. Have we assembled and considered the best available scientific and commercial information relevant to this species?
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We ask that you please provide your comments no later than **February 28, 2018**. We recognize that this is a short period of time. If you do not have enough time to review the entire document, we suggest that you focus your review on those portions that pertain to your area of expertise. If you are willing to peer review but are unable to complete your assessment during this time period, please let me know when we may anticipate receiving your comments. We will summarize and respond to the substantive comments raised by all peer reviewers and use the information, as appropriate, in the final SSA.

Please provide your written response to us by email or by letter. We would also appreciate receiving a copy of your Curriculum Vitae for our records. Please be aware that your completed review of the SSA, including your name and affiliation, will be included in the administrative record for this evaluation and will be available to interested parties upon request.

If you have any questions about the SSA, please feel free to contact Angela Picco at (916) 414-6490 or by email angela_picco@fws.gov. Please submit your comments and associated materials to the following address:

Angela Picco, Recovery Coordinator
Pacific Southwest Regional Office, Region 8
U.S. Fish and Wildlife Service
2800 Cottage Way, Room W-2606
Sacramento, CA 95825

Thank you for your consideration.

Erin Nordin
Acting for Angela Picco

Conflict of Interest Disclosure Form

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This Conflict of Interest Form should indicate whether the nominator(s) has an economic interest in, or acts as an officer or a director of, any outside entity whose financial interests would reasonably appear to be affected by the addition of the nominated condition to the newborn screening panel. The nominator(s) should also disclose any personal, business, or volunteer affiliations that may give rise to a real or apparent conflict of interest. Relevant Federally and organizationally established regulations and guidelines in financial conflicts must be abided by. Individuals with a conflict of interest should refrain from nominating a condition for screening.

Date:

Name:

Position:

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest:

_____ I have no conflict of interest to report.

_____ I have the following conflict of interest to report (please specify other nonprofit and for-profit boards you (and your spouse) sit on, any for-profit businesses for which you or an immediate family member are an officer or director, or a majority shareholder, and the name of your employer and any businesses you or a family member own:

1. _____

2. _____

3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge.

Signature: _____ *Francis Villablanca*

Date: _____

From: [Dieter Wilken](#)
To: [Chris Kofron](#)
Cc: dwilken@sbbg.org
Subject: [EXTERNAL] Review Itr: Cirsium scariosum loncholepis
Date: Monday, April 23, 2018 9:43:28 AM
Attachments: [USFWS Itr Apr 23 2018.pdf](#)

Chris,

Please find my letter of review attached. Any questions, feel free to ask.
Dieter



1212 Mission Canyon Road
Santa Barbara, California 93105

April 23, 2018

Chris Kofron
Senior Biologist and Recovery Permit Coordinator
U.S. Fish and Wildlife Service
2493 Portola Rd., Suite B
Ventura, CA 93003

Dear Chris:

Overall, the draft "Species Status Assessment for La Graciosa thistle" represents a thorough and succinct analysis of available data and other information pertinent to the continued protection of this species. The concepts of Resiliency, Representation, and Redundancy are certainly useful in framing the overall strategy for conservation. The several figures, tables, and the appendix are critical to providing evidence for objective analysis and comparing the pros and cons of conclusions in this document. I believe that conclusions pertaining to its long-term survival and specific conservation protocols are based on sound reasoning and good science.

I have appended here some comments that might enhance or clarify the presentation of the document.

Discussions summarizing taxonomy, life history, "individual needs", genetic diversity, and historic range and distribution are clearly succinct and relevant; the topics are self-evident. I believe that they represent current knowledge, based on an obviously thorough analysis of herbarium collections, CNDDDB reports, and the scientific literature, in addition to unpublished reports.

However, the header "Species Needs" (p 6) appears to be unclear regarding the definition of a "need". If one intends to have this section include the concept of "further study", as implied by the "need", it might be useful to address such issues individually (e.g., further genetic or phylogenetic analysis, a better understanding of ecological factors affecting seed dormancy or germination). The use of the subheader "Individual Needs" (p 8), might better be described summarily as "Ecological Preferences", because the discussion focuses primarily on ecological factors that appear to favor establishment (e.g., substrate, soil moisture, open sites).

The discussions under "Current Conditions and Status" are also thorough and succinct, based on the data presented in several tables and the appendix. Under "Threats" (p 11 and following), I assume that "Groundwater depletion" is a general subheader for the 3 general areas of geographical distribution (i.e., "Santa Maria Valley Groundwater Basin", "Dune Lakes", and "Entrance Ponds". It may be useful to clarify this in the final document with a different font style or size.



1212 Mission Canyon Road
Santa Barbara, California 93105

April 23, 2018

p.2

The conservation measures (p 16) address current activities taking place at specific sites (e.g., weed eradication, pig removal, outplanting), but I can't seem to find a general list of future actions (p 16) or elsewhere, except as mentioned under "Future Scenarios". It seems that more specific plans for seed collection and storage and propagation are not mentioned, as is the potential for irrigation or enhancement of ground water at sites where this tactic may be feasible.

I came across a very few spelling errors in the document and assume that the document will be reviewed using a spell-checker, which was not available to me while reviewing this document (e.g., GNDNWR Cursium [Cirsium] seed, p. 27).

Yours sincerely,

A handwritten signature in black ink that reads "Dieter A. Wilken". The signature is written in a cursive, flowing style.

Dieter Wilken, Ph.D.
Research Associate, Santa Barbara Botanic Garden
Adjunct Curator, Cheadle Center for Biodiversity and Ecological Restoration