## Comments on the taxonomic status of Argythamnia blodgettii

As stated in the proposed rule, *Argythamnia blodgettii* (Torr. ex Chapm.) Chapm. was first described as *Aphora blodgettii* Torr. ex Chapm., however, the earliest publication was in Chapman (1860 p. 408) not Chapman (1884 p 100) as stated in the rule. Florida material was subsequently considered synonymous with *Argyrothamnia fendleri* Mull. Arg. by Mueller (1866 p 737), a species with a range that included Venezuela, Columbia, Mexico and Florida. Chapman (1883 p 408; 1897 p 431) maintained the Florida plants as endemic, creating the name *Agyrothamnia blodgettii*. Apparently, Mueller's spelling of the genus was incorrect and that misspelling was duplicated by Chapman.

Pax (1896 p 45) originally included the species as distinct when he restored the status of *Ditaxis* from a subgenus within *Argythamnia* to a genus, creating the binomial *D. blodgettii* (Torr. ex Chapm.) Pax . Pax and Hoffman (1912 p61) subsequently treated *D. blodgettii* as a synonym of *D. fendleri* (Mull Arg.) Pax & K. Hoffman with a range that included Florida, Trinidad, Curacao, Columbia and Venezuela (Pax and Hoffman 1912). The authors indicated that the specimen from Mexico (Liebm. sn, no date, repository unknown, cited in Mueller 1866) was not seen. Small (1903 p 699; 1913a p 106; 1913b p 78; 1913c p 699) followed Chapman's treatment of the species as endemic. Ingram (1952 p75) reverted to the treatment of *Ditaxis* as a subgenus of *Argythamnia* and included Florida material in *A. fendleri*. Following that work, the species was renamed *A. argothamnoides* (Bertero ex Spreng) J.W. Ingram to address a nomenclatural issue with *A. fendleri* (Ingram 1953 p. 423). Ingram (1952) indicates that the distribution of *A. argothamnoides* (including Florida material) as Florida and Venezuela. Ingram (1952) treatment was restricted to North American specimens and did not examine material from Venezuela.

Webster (1967) disagreed with the inclusion of *Argythamnia blodgettii* as a synonym of *A. argothamnoides* (=*A. fendleri*) based on flower and seed coat details and considered *A. blodgettii* to be a distinct from *A. argothamnoides* and endemic to Florida. It is unclear which, if any, specimens Webster examined as the basis for this conclusion. Long and Lakela (1978) apparently followed Chapman, Small and Webster and considered *A. blodgettii* to be a South Florida endemic, as did (Wunderlin 1998 and Wunderlin and Hansen 2003, 2011). Radcliffe-Smith and Govaerts (1997) published *Ditaxis argothamnoides* (Bertero ex Spreng.) Radcl.-Sm. & Govaerts. That publication did not list either Ingram's *A. argothamnoides* or Chapman's *A. blodgettii* as a synonym, so it is not clear if the name was intended to apply to Florida plants or not.

Ramirez-Amezcua and Steinman (2013) published a treatment of the *Argythamnia* subgenus *Ditaxis* in Mexico that states that the range of *A. argothamnoides* includes Florida. However, that treatment only indirectly references *A. argothamnoides* in their description of *A. ingramii* for the purpose of comparing the two species. The basis for the use of *A. argothamnoides* to include Florida plants is not detailed in that publication. An email communication was sent to the corresponding author (Dr. Ramirez-Amezcua) to inquire about the basis for the use of *A. argothamnoides* in Ramirez-Amezcua and Steinman (2013), but no response was received. Wunderlin and Hansen (2015) included the species as a synonym of *A. argothamnoides* but the rationale for this taxonomic change is not clear from that publication. Integrated Taxonomic Information System (ITIS) currently considers the accepted name for this taxon to be *Ditaxis argothamnoides* (Retrieved [November 19, 2015], from the

Integrated Taxonomic Information System on-line database, <a href="http://www.itis.gov.">http://www.itis.gov.</a>). The USDA/ PLANTS database currently considers A. blodgettii to be the accepted name for this taxon.

Given the published information reviewed in preparing these comments, I did not find a compelling justification for the recent inclusion of Florida plants with material from *Argythamnia* spp. outside of Florida. As a precautionary approach, I recommend that the USFWS accept the treatment of *A. blodgettii* as a distinct species that is endemic to Florida for the purpose of preparing this rule. I also recommend that USFWS conduct an independent review of botanical literature for additional published taxonomic information on *Argythamnia* that includes review of Florida material. I recommend that the USFWS contact Dr. Richard P. Wunderlin or Dr. Bruce Hansen, University of South Florida, to determine their basis for treating *A. blodgettii* as a synonym of *A. argothamnoides* in Wunderlin and Hansen (2015). Finally, I recommend that USFWS contact Dr. Yocupitzia Ramirez-Amezcua, Instituto de Ecologia A.C., to determine if the treatment of *Argythamnia* in review for the Flora of North America (<a href="http://floranorthamerica.org/Review/under-prod-12">http://floranorthamerica.org/Review/under-prod-12</a>) is complete and can be made available for consideration in preparing this rule.

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