

Miami Blue Chapter

North American Butterfly Association

May 16, 2008

VIA U.S. Mail

Mr. Paul Souza
Field Supervisor
U.S. Fish and Wildlife Service
1339 20th Street
Vero Beach, Florida 32960

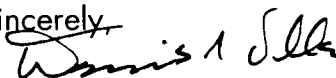
Dear Mr. Sousa:

I am the president of the Miami Blue Chapter of the North American Butterfly Association. I am writing you to express our concern regarding the continued, unpermitted truck spraying of permithin in and around Key Deer National Wildlife Refuge (the "Refuge") by the Florida Keys Mosquito Control District (FKMCD). I am aware of the annual special use permit regarding spraying that is routinely issued to the FKMCD, and I have commented thereon for the last few years (to little avail). However, based on information learned from the FKMCD at recent meetings of the Florida Mosquito Control Coordinating Council - Imperiled Species Committee, it has become obvious that uncontrolled spraying of this dangerous toxin is being allowed without any regulation by FWS.

We are particularly concerned regarding the fate of at least two butterflies, the Florida Leafwing and Bartram's Scrub-Hairstreak, both of which are "candidate species" for listing under the Endangered Species Act. While I am aware of certain scientific (toxicology?) studies being conducted on or in connection with the Refuge, there is no legitimate reason to permit toxic chemicals to be sprayed in (or around in the case of drift) the Refuge without the appropriate permit, and no such permit should be issued pending the conclusion of the on-going scientific studies. As they say in baseball: "tie goes to the runner," in this case the Leafwing and the Hairstreak.

Please call me so we can discuss your office's strategy in this regard.

Sincerely,



Dennis J. Olle
President