

# *Miami Blue Chapter*

North American Butterfly Association

June 5, 2008

Mr. Paul Souza  
Field Supervisor  
U.S. Fish & Wildlife Service  
South Florida Ecological Services Office  
1339 20th Street  
Vero Beach, FL 32960

## **Re: 2008 FKMCD PERMIT**

Dear Mr. Souza:

It was good talking to you the other day regarding the mosquito spraying activities of Florida Keys Mosquito Control District (FKMCD) on KDNWR. To that end, we understand that no annual (2008) permit has been issued to FKMCD with respect to their activities on the Refuge, but that aerial "missions" are being permitted on a "case-by case basis". As I intimated in our recent conversation, we are particularly concerned about what appears to be the unregulated and unpermitted truck spraying of permithin by FKMCD in and immediately proximate to Refuge lands. We are especially concerned about the well-being of the Endangered Species Act (ESA) "candidate species" (Florida Leafwing and Bartram's Scrub-hairstreak).

As you will appreciate, it would be counter-productive, and irresponsible to put these species in queue for ESA listing and then knowingly allow their existence to be threatened, especially through the unregulated activities of another government on a federal wildlife refuge.

Additionally, current federal mosquito management guidelines for the National Wildlife Refuge System, the 2005 Interim Mosquito Guidance, "allow pesticide treatments for mosquito population control on Refuge System lands only when local, current mosquito population monitoring data are collected and the data indicate that refuge-based mosquito populations are contributing to a human, wildlife, or domestic animal health threat." (emphasis added). Furthermore, the necessary "health threat determination" is to be made by the appropriate governmental public health authority that has "the expertise and official capacity to identify" such threats.

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We would respectfully request that the Service take immediate, definitive action to protect these species while their ESA application is being considered and ensure compliance with current federal mosquito management guidelines. Regardless of your decision, I would appreciate being advised of your decision in this regard, at your earliest convenience.

Sincerely



Dennis J. Olle

President

Miami Blue Chapter