

April 2, 2009

Ren Lohofener
Regional Director
US Fish and Wildlife Service
California-Nevada Region
2800 Cottage Way, Suite W2606
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Dear Ren,

The Laguna Mountains skipper (*Pyrgus ruralis lagunae*, LMS) was designated as a federal Endangered Species in January of 1997. More than a decade later, the subspecies continues to decline. Recent extensive surveys by the Service and LMS cooperators have determined that the LMS is extirpated from the Laguna Mountains, a site that encompassed over half of the subspecies' range at the time of listing. There are now only 5 meadows on neighboring Palomar Mountain that support LMS populations; you might agree that this species is poised on the brink of extinction.

On February 21, 2007 the U.S. Fish and Wildlife Service's Carlsbad office hosted a cooperative meeting with eminent ecologists and entomologists to discuss the biology and conservation of this subspecies and develop a strategy to prevent its extinction. After the meeting, Service staff took many of the ideas and concepts discussed and developed a study plan so that conservation efforts would be based on the best available science.

First, I want to commend your staff for taking a proactive approach to the conservation of this species. Over the last two years, a small team of your staff has developed butterfly and host plant survey methods and captive propagation protocols that provide the underpinning of a successful conservation program. Staff at the Carlsbad office have completed a Five Year Review, a Species Optimal Resurgence Strategy, a poster paper on LMS displayed at your recent climate change conference in San Francisco, a Draft Research Report for two years of monitoring and occupancy analysis, and a Draft LMS Captive Propagation Plan in accordance with Service policy. They have also secured a critical million-dollar easement (i.e., the Mendenhall Easement) to permanently protect what may be the most important remaining LMS population. All of this work has been possible because of the dedication of staff members who have accomplished much on a shoestring budget with limited institutional support.

Despite these achievements, there is much to be done if we are going to prevent the imminent extinction of the Laguna Mountains skipper. In the immediate future, the Service should be working in earnest to captive propagate this butterfly and to swiftly reintroduce it to appropriate sites within its historic range at both Palomar Mountain and within the Laguna Mountains. To accomplish this, your agency needs to fully support its staff and their outstanding efforts. It is our opinion that the Service should 1) start captive propagation immediately, 2) work to prepare sites for reintroduction where feasible on Palomar Mountain and in the Laguna Mountains, and 3) continue to monitor

what remains of the population in a scientifically credible manner to determine if what your agency is doing is working. *Captive propagation, reintroduction and continued monitoring are critical, as the threat of extinction is greatly exacerbated by the risk of catastrophic wildfire fueled by prolonged drought and climate change, as well as the potential threats of over grazing, water draw-downs, and the recent discovery of a non-native insectivorous ladybird beetle on Palomar Mountain.*

In this effort, you have the support of multiple scientists (many of whom have been providing feedback on this project free of charge) and the conservation community. We are currently working on grant opportunities for which we hope to identify matching government funds to continue our private-public sector conservation partnership.

Thank you for your consideration of this request. If possible I would like to meet with you about this issue.

Best regards,

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