

The status of *Hermes* copper butterfly distribution compiled by Engelhard (2004a, 2004b) lists occupied locations known as of 2004. While the assessment also included total area and development status for some sites, such information for most sites was not determined at that time. Without specific information about existing and proposed development projects and their associated impacts to habitat, we were unable to determine the extent to which urban development has reduced the known range of the *Hermes* copper butterfly.

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Comment [CN7]: Do we have this info in our files?

Also, much uncertainty exists regarding the distribution of the species because the range of its host plant, spiny redberry, extends well beyond the known range of the butterfly, and surveys have not been conducted throughout the host plant range (especially inland San Diego County and northwestern Baja California Norte). Even the survey information for sites historically or currently occupied by the species is limited. The information in Table 1 of the petition and in Engelhard (2004a, 2004b) illustrates the fact that most occupied sites have only been surveyed on one or two occasions and many have not been surveyed since the 1950s or 1960s. Therefore, it is difficult to assess the species' current status in the absence of more current information.

In conclusion, we agree with the petitioner that urban development has likely reduced and fragmented habitat for *Hermes* copper butterfly in San Diego County. However, the significance of this habitat loss and fragmentation has not been quantitatively estimated. Therefore, we have determined that information in the

Comment [CN8]: Sounds like a good reason to do a status review

Comment [KJ9]: Agree.



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

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File Name: 04052006Thorne'shairstreakbutterfly90-day Memo.doc

Tracking Number: 06-540

Comment [U1]: Needs to be transferred to your letterhead

### Memorandum

To: Chief, Division of Listing and Candidate Conservation

From: Field Supervisor, Carlsbad Fish & Wildlife Office, Carlsbad, Oregon

Subject: 90-day finding on a petition to list Thorne's hairstreak butterfly (*Callophrys [Mitoura] grynea thornei*)

Enclosed is the 90-Day Petition finding package that was prepared in our office by Kathryn Roberts. The package includes: a briefing statement, action control sheet, summary of notice, table of contents, Federal Register Notice, press release, outreach plan, contact matrix, petition, and references cited. Three CDs are enclosed; one with all of the above named documents, another with outreach material, and finally one with copies of all references cited in the Federal Register Notice.

We find the petition presents substantial information for Thorne's hairstreak butterfly, and we are initiating a status review of this species.

We are submitting this package for your review prior to it being sent to the Washington Office to meet a court-ordered Federal Register publication date of August 1, 2006.

Please contact Tannika Engelhard or Jim Bartel at (760) 431-9440 if we can be of assistance in any way.

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