

RECEIVED FORESTRY

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Good morning **SOUTHERN REGION**

For the record, my name is Rob Mrowka and today I am representing the Center for Biological Diversity, a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 40,000 members throughout the United States. The Center and its members are concerned with the conservation of imperiled species, such as the Las Vegas buckwheat, and the effective implementation of the ESA.

Unfortunately, and tragically, the time for voluntary, proactive conservation measures to protect the Las Vegas buckwheat has come and gone with little having been done to provide for this species' long term continuance on our planet.

The Fish and Wildlife Service and the Bureau of Land Management in particular have failed to live up to their stewardship responsibilities under Section 7 of the Endangered Species Act. A major met<sup>o</sup> population in the upper Las Vegas Wash has been fragmented with 92 acres of habitat soon to be extirpated by the Park Highlands master planned community. A population in critical desert tortoise habitat in the Coyote Springs area has likewise been extirpated for the sake of a golf course and community development. A nearby population is threatened by utility corridors, off-road vehicles and potential future development. A significant population in Lincoln County is threatened by a proposed coal-burning power plant and off-road vehicle use. The future is uncertain for the remaining population in the Upper Las Vegas Wash in an area, within the disposal boundary under the Southern Nevada Public Land Management Act, known as the Conservation Area. Likewise, the BLM is considering leases and permits that would essentially extirpate the last known remaining buckwheat habitat in the southwest part of the valley - the Tropicana-Decatur population.

The major threats to this species include unmanaged and inappropriate off-road vehicle use and recreation, including desert racing; the privatization and development of lands; mining; <sup>and</sup> changes in climate and the historic wildfire regimes, leading to more frequent and more intense fires, and the increase of invasive weed species.

At least three times in the recent past, the State has not acted upon the recommendations of its own Nevada Heritage Program and the Nevada Native Plant Society to place the Las Vegas buckwheat on the state's list of critically endangered plant species.

This recommendation can no longer be ignored if there is any hope to prevent the extinction of the Las Vegas buckwheat from our planet and from the lives of future generations.

In closing, the Center for Biological Diversity urges the State Forester to declare this species critically endangered, to ensure all appropriate conservation measures are afforded it, and to ensure regulatory compliance occurs.

Thank you. The Center for Biological Diversity will be submitting formal written comments in advance of the deadline.

