



Southern Nevada Chapter

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SOUTHERN REGION



Platinum

Burke & Associates, Inc.  
CB Richard Ellis  
Cox Communications  
EJM Development Co.  
Embarq  
Southwest Gas Corporation

Gold

Glen, Smith & Glen Development  
Majestic Realty Co.  
Marnell Properties  
Piise Companies, LLC  
Roel Construction Company, Inc.  
Thomas & Mack Development Group

Silver

American Nevada Company  
Bank of America Nevada  
CIP Real Estate  
Colliers International, Inc.  
Commerce CRG/Cushman & Wakefield Alliance  
CORE Construction  
DP Partners  
Grubb & Ellis | Las Vegas  
Harsch Investment Properties, LLC  
JMA  
LM Construction Co., LLC  
LaPour  
Lee & Associates  
Marcus & Millichap  
Molasky Group of Companies  
Nevada Power Company  
1 Velocity, Inc.  
Prudential CRES  
Silver State Bank  
Stanley Consultants, Inc.  
Tradewinds Construction  
Trammell Crow Company  
TWC Construction, Inc.  
United Construction Company  
Voit Commercial Brokerage  
Wells Fargo

Bronze

Access Commercial Mortgage  
Affordable Concepts, Inc.  
Amtec Communications  
Bank of Nevada  
Bergelectric Corporation  
Business Bank of Nevada  
CENTRA Properties, LLC  
Christopher Commercial  
CommCap Advisors  
Community Bank  
Dekker/Perich/Sabatini, Ltd.  
Granite Exchange Services, Inc.  
Helix Electric  
Irwin Union Bank  
Jackson Shaw Company  
Jaynes Corporation  
Juliet Land Company  
KeyBank  
KKE / HFTA Architects  
Langan Engineering & Environmental Services  
Lee & Sakahara Architects  
Martin-Harris Construction Co.  
Martin & Martin, Inc.  
Nevada State Bank  
OGI Environmental, LLC  
Opulence Studios Inc.  
Orgill/Singer & Associates  
Panattoni Development Company  
RBF Consulting  
Real Estate Group Nevada LLC  
ReMax Millennium Commercial  
Restrepo Consulting Group LLC  
Roche Constructors, Inc.  
Sansone Companies  
Southwest Engineering  
SR Construction, Inc.  
Stoltz Management  
Strata Building Group, LLC  
Sun Commercial Real Estate  
Terracon  
Ticor Title  
The Korte Company  
The Penta Building Group, Inc.  
TRC  
WESTAR Architectural Group/NV, Inc.  
Western Risk Insurance  
WPH Architecture, Inc.  
WRG Design, Inc.

February 29, 2008

Nevada Division of Forestry  
Attn: Mr. Rich Harvey  
2478 Fairview Drive  
Carson City, Nevada 89701

Dear Mr. Harvey:

The Southern Nevada Chapter of the National Association of Industrial and Office Properties (NAIOP) is concerned that the proposed listing of the Las Vegas buckwheat (*Eriogonum corymbosum* var. *nilessi*) as a State of Nevada Critically Endangered Species will have adverse economic consequences for land development in the Las Vegas Valley. NAIOP is a nonprofit organization whose membership consists of developers, brokers, architects, engineers, builders, and banks. The Southern Nevada Chapter is the state's largest commercial real estate trade group and focuses on issues surrounding development and its benefits to the local economy. Any additional regulatory requirements imposed on potential land development may increase associated economic costs. Developers may seek to avoid the entire area where the buckwheat may potentially occur so as to not even have the possibility of conflicts over this plant.

The Nevada Division of Forestry (NDF) requires that any project on public or private land that results in disturbance to occupied habitat or the loss of individual critically endangered plants would require a permit. Property owners with buckwheat plants on their property would incur costs associated with preparing the NDF permit application, the loss in property value if the permit is denied, and the cost of any required mitigation measures. The economic burden of these requirements and uncertainty of the permit process may limit developers from undertaking projects in northern portions of the Las Vegas Valley.

NAIOP is opposed to the listing of the Las Vegas buckwheat by NDF. Other options for management of the plant that does not impact private development should be considered. Thank you for your attention to these comments.

Sincerely,

John Restrepo  
President, Southern Nevada Chapter  
National Association of Industrial and Office Properties