

United States Department of the Interior



NATIONAL PARK SERVICE

LAKE MEAD NATIONAL RECREATION AREA
601 NEVADA HIGHWAY
BOULDER CITY, NEVADA 89005

RECEIVED FORESTRY

MAR 20 2008

CENTRAL OFFICE

N1617(LAME-RM)

March 19, 2008

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

Dear Mr. Harvey:

Las Vegas buckwheat (*Eriogonum corymbosum* var. *nilesii*) is a rare plant found in the Mojave Desert, specifically, in the Las Vegas Valley and Muddy Mountains of Clark County, Nevada. Las Vegas buckwheat, part of the widespread *corymbosum* complex, had formally been assigned to the Colorado Plateau variant *Eriogonum corymbosum* var. *glutinosum* (Reveal 2004, *Phytologia* 86: 121-159). Las Vegas buckwheat was taxonomically reclassified in 2004 because of morphological differences (dense white tomentose leaves), disjunct geographic distribution, and preference for gypsum soils (Reveal 2004). In 2005, Mark Ellis confirmed with genetic analysis the distinctness of the Nevada populations providing AFLP (amplified fragment length polymorphism) and chloroplast DNA evidence (Ellis and Wolf 2007, US Fish and Wildlife Service report, 7 pp). *Eriogonum corymbosum* var. *nilesii* is an accepted taxon in the recently published *Flora of North America* (vol. 5, p. 258, 2005, Oxford University Press). Based on this cumulative evidence, the National Park Service (Lake Mead National Recreation Area) accepts *Eriogonum corymbosum* var. *nilesii* as a valid taxon where it is currently classified as an NPS sensitive species.

In 2005, a new population of Las Vegas buckwheat was discovered in the Muddy Mountains area near Lovell Wash. This population consisted of approximately 7,000 individuals growing on gypsum soil outcroppings. The majority of the population falls on BLM land with the remainder occurring on NPS land.

The Lovell Wash population is protected under NPS regulations in addition to protection provided by its occurrence within a designated wilderness area (Muddy Mountains Wilderness Area). Of the nine known remaining populations, Lovell Wash is currently the only population which we are aware that has this level of protection.

We are aware that a portion of the Las Vegas Wash and Nellis AFB populations are conserved or proposed to be conserved. The remaining populations are threatened with development and OHV

activity and are summarized as follows; portions of 3 populations (Upper Las Vegas Wash, Nellis AFB, Coyote Springs) plus 3 additional populations (LV Valley private, Tropicana and Decatur, Toquop Wash) are to be developed or have already been developed; portions of 1 population (Coyote Springs) plus 2 additional populations (Gold Butte, White Basin) are threatened by OHV activity.

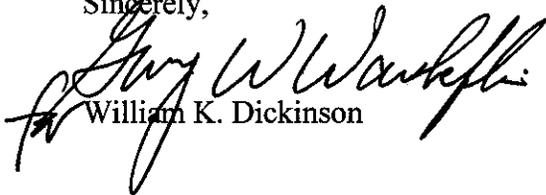
We are concerned that the remaining pristine population at Lovell Wash is likely not enough to ensure this species' survival. It is not only this species in need of protection. The habitat that supports both the Las Vegas buckwheat and the Nevada state listed Las Vegas bearpoppy (*Arctomecon californica*) is unique and without increased conservation efforts in place we may lose additional integral portions of the eastern Mojave Desert gypsum habitat.

In 2007, a helicopter survey of gypsum habitat was conducted jointly by the BLM and NPS on BLM, NPS, and Valley of Fire State Park lands. This effort resulted in approximately 361,000 acres surveyed where we located approximately 5 acres supporting additional *E. corymbosum* populations located on BLM lands. We can be confident that the majority of suitable *E. corymbosum* habitat has been surveyed with few additional populations located.

The addition of *Eriogonum corymbosum* var. *nilesii* to the list of fully protected species within the state of Nevada will help regulate threats to this species thus minimizing the loss of critical Las Vegas buckwheat habitat and genetic diversity of the species. We support the recommendations to add *Eriogonum corymbosum* var. *nilesii* to the Nevada list of fully protected species.

We appreciate the opportunity to comment on the proposed listing. For additional information, please contact Vegetation Management Specialist Alice Newton at (702) 293-8977.

Sincerely,



William K. Dickinson