



Southern Nevada Group PO Box 19777 Las Vegas NV 89132

Nevada Division of Forestry  
2478 Fairview Drive  
Carson City NV 89701  
by email to Rich Harvey at [rharvey@forestry.nv.gov](mailto:rharvey@forestry.nv.gov)

March 17, 2008

Re: Proposed listing of Las Vegas buckwheat (*Eriogonum corymbosum* var. *nilesii*) as a critically endangered species

Dear Sir,

I attended the Nevada Division of Forestry workshop as a representative for the Sierra Club on February 29, 2008, regarding proposed listing of Las Vegas buckwheat (*Eriogonum corymbosum* var. *nilesii*) as a critically endangered species. I did make an oral comment there, and I would like this written statement to be added to the oral one.

The local group of the Sierra Club supports the listing of this species as a critically endangered species with in the state of Nevada and to be managed as such by your division.

I listened to the science that has decided that the Las Vegas buckwheat should indeed be classified as a variant, *nilesii*, and I saw the maps that described where the species has been found. I listened to people say that since this plant is found in several places, it must also exist in other places that we just haven't found yet, and therefore the plant shouldn't be listed until we know everything we can possibly know about it. That line of thinking seems to me to be entirely backwards.

The point of protecting a plant or animal as endangered is because we don't know enough about it to remain confident that it will survive - not thrive, merely survive - in the face of known threats. There is absolutely no question that this plant is facing extreme threat; most of its known habitat has already been converted to urban development. Since the species lives in flat, low-land areas, its habitat is a developer's first choice for building.

I also listened to an argument that since the plant is already protected under the Clark County Desert Conservation Plan, there was no need for the state to offer it protection. This is also backwards thinking, unless it is true that your division has no mission that actually affects the well-being of the natural environment that we Nevadans live in and cherish. I'm not willing to say that at all. The fact that the

county and the US Fish and Wildlife Service protect the buckwheat under the DCP is an argument by itself that the status of the plant is precarious enough that it should receive protection from the state as an endangered species.

Under the broadly-accepted scientific principle called the Precautionary Principle, when there are unknowns in a system, the most conservative, most cautious and least disruptive course of action should be pursued. This cautionary action maintains all the options possible for future adaptive actions, as more information is collected and understood. Certainly the Precautionary Principle applies in this situation with the grievous damage that has already been sustained to the habitat of the buckwheat and the continued threat of more habitat destruction by continued development, irresponsible off-road vehicle use, illegal dumping and other urban-interface activities.

As an urban dweller, I understand the necessity of having homes, roads and services. But I and my friends and colleagues in the Sierra Club have no wish to live in a sterile urban environment. We want to live in a city that reflects its surrounding natural environment, and all the diversity and vibrancy that resides there. Sierra Club members appreciate the value of preserving and living in harmony with the natural environment, and most people, when asked how they want to live, will tell you that parks, open space and the natural world is important to them. This is why builders design green belts into their projects; it enhances the selling price of those homes and commercial areas.

Your Division has an important role in protecting the natural environment even here within the urban footprint, at the urban interface, through our valleys and washes. Thank you for considering this matter most carefully.

Sincerely,

Jane Feldman  
Conservation Co-Chair