

July 20, 2020

Nevada Division of Forestry  
Attn: John Christopherson  
2478 Fairview Drive  
Carson City, NV 89701

Mr. Christopherson,

We, the undersigned members of the scientific community, urge the Nevada Department of Conservation and Natural Resources to extend the full protections of the Nevada List of Fully Protected Species to *Eriogonum tiehmii* (Tiehm's buckwheat), a narrow endemic plant species restricted to the Silver Peak Range in Esmeralda County, Nevada. Tiehm's buckwheat has lived in its ecosystem, relatively undisturbed, for millennia, but it now faces extinction due to a proposed lithium mine called the Rhyolite Ridge Lithium-Boron Project. As scientists who study biodiversity and plant conservation, we support protection of the rich flora and ecosystems of Nevada, and we oppose ill-conceived projects that put Nevada's biodiversity at risk.

The extinction threat to Tiehm's buckwheat is clear. The proposed project identifies that more than 60% of the living plants of the species would be extirpated in the first phase, and the footprint encompasses the entire global range of the species. As proposed, the project threatens the continued existence of Tiehm's buckwheat, including its long-term viability, integrity of its habitat, and the associated biota and ecosystem function that it supports. If the project were approved, there is no doubt that it would cause the extinction of an irreplaceable component of Nevada's native heritage. In fact, the proposed impact to Tiehm's buckwheat is so egregious that no mitigation measures are acceptable or could lessen the impact to the species.

The threat to Tiehm's buckwheat highlights the vulnerability of narrowly endemic species on federal public lands and the need for the State to support and protect its natural heritage. This project has elevated Tiehm's buckwheat status as one of the most at risk plant species that is threatened with extinction in the United States.

We are currently faced with a global extinction crisis. A recent global assessment found that at least 600 plant species are now extinct and that we are losing plant species at a rate 500 times higher than the background extinction rate. The state of Nevada has an opportunity to protect its rare plant diversity and put a halt to the plant extinction crisis. Plant conservation is essential and by protecting Tiehm's buckwheat, we can ensure that Nevada's irreplaceable diversity is present for future generations.

On behalf of people who study, work with, and love plants everywhere, we urge you to take the necessary steps to provide protection for Tiehm's buckwheat.

Signed,

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