



September 12, 2021

William Dunkelberger, Forest Supervisor
Humboldt-Toiyabe National Forest
1200 Franklin Way
Sparks, NV 89431

Re: Opposition to Vista Grande Administrative Site Sale

Mr. Dunkelberger:

The Center for Biological Diversity, in consultation with expert botanist Dr. Naomi Fraga, hereby submits these comments on the Notice of Proposed Action (NOPA) for the Vista Grande Administrative Site Sale. We are strongly opposed to the proposed action and urge the Humboldt Toiyabe National Forest (HTNF) to delay this realty action until such a time as the HTNF has evaluated the conservation status of the Carson Valley monkeyflower (*Erythranthe carsonensis*) and whether it should be added to the Forest Service Sensitive Species list.

The Vista Grande Administrative Site is a 28.83 acre parcel of Forest Service land in northern Douglas County, Nevada, located just north of the intersection of Jacks Valley Road and US Highway 395. While it is surrounded by developed land, it is in a mostly natural and undeveloped state, and provides intact habitat for the ecosystem which used to fill the Carson Valley before development destroyed much of the lowland habitat in the area.

Notably, the Vista Grande site is home to the Carson Valley monkeyflower (*Erythranthe carsonensis*), an imperiled species of herbaceous annual wildflower native to the Carson Valley and immediate environs. The Carson Valley monkeyflower grows on sandy flats and gentle slopes in the Carson, Eagle, and Washoe Valleys and blooms with relatively large yellow flowers in May-June. It was described as a distinct taxon by Fraga in 2012, having previously been regarded as *Mimulus montioides* (then *Erythranthe montioides*).¹

¹ Fraga, N. 2012. "A Revision of *Erythranthe montioides* and *Erythranthe palmeri* (Phrymaceae), with Descriptions of Five New Species from California and Nevada, USA." *Aliso* 30(1): 49-68.

The Vista Grande Administrative Site is a part of Carson Valley monkeyflower population #8 (“South Indian Hills/Jack’s Valley”), as defined by the Nevada Division of Natural Heritage (then the Nevada Natural Heritage Program) in their 2018 conservation status report on the species.² This population is the largest of all Carson Valley monkeyflower populations, comprising some 25% of the global habitat for the plant. As a result, NDNH ranked the site priority for population #8 as “High,” but, due to the fact that 70% of the population is managed by HTNF, it was considered at low risk. This would be true absent the proposed action.

The Carson Valley monkeyflower has no formal protective status at either the federal or state level, but alarming amounts of habitat loss due to developments precisely like the proposed action mean that the species “is vulnerable to human-caused extinction in the long-term as pressures from urban growth continue.”³ Numerous populations have been lost to road construction, off-highway vehicle use, residential and commercial development, agriculture, and even a baseball field.⁴

The area near the Vista Grande parcel has been the site of localized extirpations of the Carson Valley monkeyflower. Historical herbarium records indicate the species presence at the junction of Topsy Lane and 395, which is now completely developed – that population has been extirpated.⁵ A nearby population at Arthur Drive and Clear Creek Road was extirpated due to the construction of the 395 highway extension.⁶

The NOPA states, “Douglas County is interested in obtaining a road easement across a portion of the parcel,” and that “the parcel would be sold through an online auction.” The parcel has extensive commercial development to the north and the south, including big box stores like Walmart, Best Buy, Home Depot, and Target. It is safe to assume that should the parcel be put up for sale, it will be fully developed and all habitat for the Carson Valley monkeyflower therein would be destroyed.

The Carson Valley monkeyflower is not currently considered a Forest Service Sensitive Species, but it is unclear as to why. Twenty-eight percent of the known occupied habitat of this species is managed by the HTNF.⁷ In 2011, the Nevada Rare Plant Workshop, an initiative of the Nevada Native Plant Society and the Nevada Division of Natural Heritage, recommended the Forest Service add the Carson Valley monkeyflower to the sensitives species list.⁸ In 2012, Fraga recommended “that the species conservation status be evaluated with Federal, State, and local

² Nevada Natural Heritage Program, 2018. “Current Knowledge and Conservation Status of *Erythranthe carsonensis* Fraga (Phrymaceae), the Carson Valley monkeyflower,” p. 28.

³ NNHP, 2018, p. 21.

⁴ Fraga, 2012, p. 62.

⁵ NNHP, 2018, p. 15.

⁶ *Ibid.*

⁷ *Id.*, p. 19.

⁸ *Id.*, p. 7.

agencies, and conservation organizations.” The Nevada Division of Natural Heritage also specifically recommended that the Forest Service add the species to the sensitive species list in a 2018 conservation status assessment report.⁹

The HTNF has not followed through on recommendations from native plant experts to conserve this species, and the Carson Valley monkeyflower remains without species-level protections.

The fact that the HTNF is under no species-specific legal requirement to avoid selling the Carson Valley monkeyflower’s habitat for development does not mean there are not legal requirements to protect this species. According to U.S. Department of Agriculture policy, the Forest Service must manage "habitats for all existing native... plants, fish, and wildlife species in order to maintain at least viable populations of such species," and to avoid actions "...which may cause a species to become threatened or endangered."¹⁰

The Forest Service should formally evaluate the conservation status of the Carson Valley monkeyflower, and make a decision as to whether or not it warrants sensitive species designation. After such an analysis, if the HTNF decides the proposed action is still warranted, a full National Environmental Policy Act (NEPA) review is necessary to ensure there are not significant impacts to the environment.

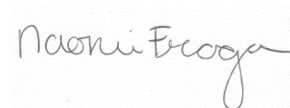
Concurrent to this letter, and pursuant to 50 CFR § 424.14(b), the Center for Biological Diversity will be submitting 30-day notice to the state of Nevada of our intent to petition the US Fish and Wildlife Service to protect the Carson Valley monkeyflower under the Endangered Species Act.

Please do not move forward with the proposed action until the conservation status of the Carson Valley monkeyflower can be evaluated by the Forest Service and the US Fish and Wildlife Service, and protections can be implemented as appropriate.

Sincerely,



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⁹ *Id.*, p. 21.

¹⁰ U.S. Department of Agriculture, Departmental Regulation 9500-004, “Fish and Wildlife Policy.”