

To: U.S. Fish and Wildlife Service

From: Board of Directors, Kinnikinnick Native Plant Society, Sandpoint, Idaho

Subject: U.S. Fish and Wildlife Service Proposed Listing of Whitebark Pine as
“Threatened” Under the Endangered Species Act

Date: January 21, 2021

The Kinnikinnick Native Plant Society (KNPS) based in Sandpoint, with over 100 members, advocates for the appreciation, conservation, and responsible use of native plants in north Idaho. The following comments have been generated and approved by the Board of Directors of KNPS, regarding the U.S. Fish and Wildlife Service’s (USFWS) proposal to list the whitebark pine (*Pinus albicaulis*) as “threatened” under the Endangered Species Act (ESA).

Whitebark pine is a high elevation species found across the western U.S. and Canada. In our region whitebark pines are found on high mountain slopes and are a keystone species. They provide a critical late-season food source, which the endangered grizzly bear needs prior to denning. The pine seeds are also a food source for many high elevation bird and mammal species, such as the Clark’s nutcracker (*Nucifraga columbiana*) and American pika (*Ochotona princeps*). Whitebark pines are also important to healthy watershed functioning. Their umbrella-like growth shades snow, creating a natural snow bank that lingers into summer. This snow retention helps to ensure a steady release of water in late spring and early summer, reducing the severity of impacts from fast snowmelt and associated flooding.

As resilient as they are in their cold, high-elevation habitats, whitebark pines are rapidly vanishing due to white pine blister rust fungus, an introduced disease that has wiped out up to 90% of the pines in many northern forests. Climate change is exacerbating droughts, wildfires, and mountain pine beetle outbreaks. These all weaken and kill whitebark pines and alter their range. Fire suppression has also led to habitat loss as subalpine firs encroach. In many places healthy whitebark pine populations have been replaced with stands of white skeletons surrounded by fir and other intrusive species.

During the Treasured Landscapes program from 2013 to 2017, KNPS worked with the Idaho Panhandle National Forest and the Friends of Scotchman Peaks Wilderness, along with other partners, to provide educational support and volunteers for restoration efforts in the Idaho panhandle. This included botanical surveys, habitat assessment, surveys of both diseased as well as seed-cone bearing whitebark pine trees, direct seed sowing, and seedling planting. Additionally, KNPS is committed to providing continued educational and volunteer contributions to monitoring and preservation of whitebark pines in north Idaho.

A listing of “threatened” under the ESA will assist with efforts like these to help restore whitebark pines and their habitats. This listing will focus attention and funding, provide a stronger basis for planning and implementing projects, and for making regulatory decisions that will benefit whitebark pines.

Therefore, the Board of Directors of Kinnikinnick Native Plant Society strongly favors and encourages the U.S. Fish and Wildlife Service to list whitebark pine as ‘threatened’ under the Endangered Species Act.