



MONTANA NATIVE
PLANT SOCIETY
PO Box 8783 • Missoula, MT 59807-8783

11 January 2021

Public Comments Processing
Attn: FWS–R6–ES–2019–0054
U.S. Fish and Wildlife Service
MS: BPHC
5275 Leesburg Pike
Falls Church, VA 22041–3803

We are writing on behalf of the 700 members of the Montana Native Plant Society (MNPS). We are an organization dedicated to preserving, conserving and studying the flora of Montana and educating the public on the values of the native flora and its habitats. We are writing to comment on the proposed listing of whitebark pine (*Pinus albicaulis*) as threatened under the Federal Endangered Species Act. Thank you for considering our comments.

MNPS believes that the models developed from existing data strongly suggest that whitebark pine is threatened with extinction in the foreseeable future and should be listed. We also believe that the only way to achieve adequate numbers of healthy whitebark populations into the future is through restoration.

MNPS believes that the primary threat to the persistence of whitebark pine is the introduced white pine blister rust (*Cronartium ribicola*). This fungus kills most sapling and adult trees. A small proportion of whitebark pine trees are resistant or immune to the rust. Adult resistant whitebark trees should be protected. In order to insure that there are healthy populations of whitebark pine in the future, it will be necessary to restore whitebark populations by protecting the small number of existing resistant adult trees and planting additional resistant seedlings or seeds. Occurrences of rust-resistant trees should be mapped and protected. Restoration treatments may require prescribed fire which might result in the loss of non-resistant seedlings in order to protect mature resistant trees. Such losses of non-resistant trees should not be considered “takings,” and should not require time-consuming consultations when the projects are being performed by competent federal or state agencies. MNPS encourages funding federal agencies to quickly develop methods to produce large numbers of rust-resistant whitebark pine seeds and seedlings and then follow up by planting them in restoration projects.

Regards,

Gretchen Rupp

Handwritten signature of Gretchen Rupp in black ink.

President
Montana Native Plant Society

Peter Lesica

Handwritten signature of Peter Lesica in black ink.

Conservation Chair
Montana Native Plant Society