



**FRIENDS  
OF THE INYO** SINCE 1986  
Caring for the Eastern Sierra

February 1, 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

Submitted online at: <https://beta.regulations.gov/document/FWS-R6-ES-2019-0054-0001/comment>

Acting U.S. Fish and Wildlife Service Director,

Friends of the Inyo (FOI) is a grassroots nonprofit conservation organization based in Bishop, California, dedicated to the stewardship, exploration, and preservation of the Eastern Sierra's public lands and wildlife. With over 1,000 members, FOI is an active partner with federal land management agencies including U. S. Forest Service (USFS) and Bureau of Land Management (BLM) which manages large areas where whitebark pine is the dominant or co-dominant species. Throughout our 30-year history we have seen the steady die off of whitebark on public lands across the Eastern Sierra. We are pleased to see that the U.S. Fish and Wildlife Service (USFWS) has proposed to list whitebark pine as Threatened under the Endangered Species Act.

The whitebark pine is an iconic conifer species of the Eastern Sierra occurring at high-elevation sites, generally between 9,000 and 12,100 feet. It is a special status species for the Inyo National Forest and there are about 95,000 acres mapped on the Forest where whitebark is either the dominant or co-dominant species. Whitebark pine is very long-lived, with many individuals reaching ages of 1,000 years and older. It is considered a keystone species, meaning it has a disproportionately large effect on the communities in which it occurs and is a major food source for many species of birds and mammals.

Although we support the listing proposal, FOI encourages the agency to modify their proposal to include critical habitat, which will help direct forest management projects and achieve maximum impact for restoration and recovery. The best available science indicates whitebark is a poor competitor that is particularly susceptible to climate change because as temperatures increase, other tree species will move up in elevation with the possibility of encroaching on whitebark pine habitat.

It is necessary for the USFWS to designate critical habitat for whitebark pine as part of the final listing decision. This will enable the Forest Service and other land management agencies to identify priority areas for whitebark pine conservation and apply appropriate management prescriptions to protect and recover the species.

One utility of critical habitat may be used in USFS Forest Plan revisions which stipulate standards and guidelines for a variety of resources, many of which the USFWS has already listed as factors for the conservation of the species. For example, the 2019 Inyo National Forest Plan designates “strategic fire management zones”—a critical factor in the conservation of whitebark pine—desired conditions for fire and invasive species, ecological conditions for at-risk species, and sustainable recreation standards which will assist managers in regulating over-snow vehicle use. Cross-country snowmobile travel can damage trees by breaking off tops and limbs when there is insufficient snow coverage,<sup>[1][2]</sup> and by compressing the snowpack which can expose white bark seedlings to extreme conditions for longer periods of time,<sup>[3]</sup>

If the whitebark pine is listed, the USFWS needs to develop a restoration plan in coordination with the other agencies’ ongoing conservation work. A recovery plan is also a critical piece of the listing that should recognize the different strategies that exist to support the conservation and restoration of the species with a foundational goal of building resistance to disease so the species can persist.

Increasing and maintaining ongoing and long-term monitoring programs to examine blister rust and mountain pine beetle spread, climate change, and fire will be critical to identifying how best to protect and recover the species across its current and future range. Robust monitoring efforts, reinvigorated by the listing, may guide management decisions and help identify the most appropriate and effective strategies for restoration through a better understanding of the main drivers of change in these ecosystems.

In conclusion we strongly support the listing of whitebark pine under the Endangered Species Act and recommend the agency revise their proposal to include critical habitat designation with the listing decision.

Sincerely,



Jora Fogg  
Policy Director

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<sup>1</sup> Tahoe National Forest OSV Designation project, Final Environmental Impact Statement, [https://www.fs.usda.gov/nfs/11558/www/nepa/100466\\_FSPLT3\\_4616235.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/100466_FSPLT3_4616235.pdf), see pages 337-338

<sup>2</sup> Effects of Winter Recreation on Wildlife of the Greater Yellowstone Area: A Literature Review and Assessment. (n.d.). (n.p.): Greater Yellowstone Winter Wildlife Working Group.

<sup>3</sup> Lassen National Forest OSV Designation project, revised Final Environmental Impact Statement [https://www.fs.usda.gov/nfs/11558/www/nepa/100384\\_FSPLT3\\_4278861.pdf](https://www.fs.usda.gov/nfs/11558/www/nepa/100384_FSPLT3_4278861.pdf), page 308