

September 20, 2010

Public Comments Processing
Attn: FWS-R6-ES-2010-0047
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, Suite 222;
Arlington, VA 22203

To U.S. Fish and Wildlife Service:

As U.S. Fish and Wildlife undertakes a status review of whitebark pine (*Pinus albicaulis*), American Forests, the nation's oldest nonprofit conservation organization, strongly supports the Service's efforts to thoroughly explore approaches to protect and restore this vital species, including potentially listing it as threatened or endangered under the Endangered Species Act.

The rate at which the whitebark pines are dying in the United States western mountain region is extremely alarming. The mature whitebark pines are essential to a healthy high-altitude ecosystem, from providing as much as two-thirds of the grizzly bears' energy source, to creating a microclimate supporting as increasing complexity of plants and animals as well as preventing erosion and rapid snowmelt.

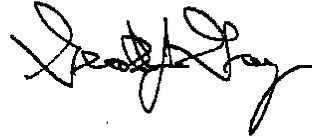
Whitebark pines are being killed by a combination of factors, including blister rust and the mountain pine beetle. While cold mountain temperatures once limited beetle populations to lower elevations, climate change is allowing beetle populations to explode in high-elevation whitebark forests. Because of these threats and other factors, nearly half the whitebark stands in the tree's historical range are dead or dying, with far worse mortality in some areas.

Current efforts are not enough to protect and restore the tree population. With the loss of trees far outpacing natural regeneration, additional resources are needed for replanting with blister rust-resistant seedlings, pest management, prescribed fires, and other restoration and research programs. American Forests and our community partners are dedicated to community based forest restoration and believe these practices can aid the efforts in restoring the whitebark pine.

Recognizing the severe threats to the continued survival of whitebark pine, Canada's scientific committee on endangered wildlife concluded that whitebark pine qualified as endangered under the country's Species at Risk Act. We are confident that a full review by your agency of the

latest scientific data and information on whitebark pine will lead you to determine that there is a need for additional resources to protect and restore the species. Listing it as endangered or threatened in all or most of its range, will afford whitebark pine the significant protections that come with such a designation.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerry Gray". The signature is fluid and cursive, with a large initial "G" and a long, sweeping tail.

Gerry Gray, Ph.D.
Acting Executive Director
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