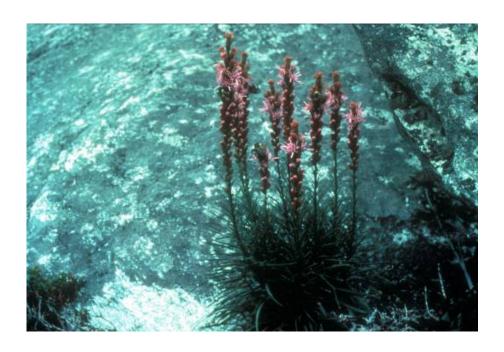
# Heller's blazing star (*Liatris helleri*)

# 5-Year Review: Summary and Evaluation



U.S. Fish and Wildlife Service Southeast Region Asheville Ecological Services Field Office Asheville, North Carolina

### 5-YEAR REVIEW

Heller's blazing star (*Liatris helleri*)

### LIST OF ABBREVIATIONS

**AFO** Asheville Field Office, U.S. Fish and Wildlife Service

**ASU** Appalachian State University

**BRP** Blue Ridge Parkway

**EOR** Element Occurrence Record

(a mapping unit commonly used by Natural Heritage Programs)

**FR** Federal Register

NCNHP North Carolina Natural Heritage Program

**NPS** National Park Service

**NPS-BRP** National Park Service, Blue Ridge Parkway

**USFS** U.S. Forest Service

**USFWS** U.S. Fish and Wildlife Service

### **5-YEAR REVIEW**

### Heller's blazing star/Liatris helleri

### I. GENERAL INFORMATION

Methodology used to complete the review: We announced initiation of this Α. review and requested information in a published Federal Register notice with a 60-day comment period on July 6, 2009 (74 FR 31972). Pertinent data were obtained from the recovery plan, published papers and unpublished reports on this species, and experts familiar with this species. Once all data were gathered for this species, the status information was compiled and the review was completed by the species' recovery lead biologist in the U.S. Fish and Wildlife Service's (USFWS) Asheville Ecological Services Field Office (AFO) in Asheville, North Carolina. In conducting this 5-year review, we relied on the best available information pertaining to historical and current distribution, life history, habitats, and potential threats to this species. During the comment period, we did not receive any additional information about *Liatris helleri* in response to the *Federal* Register notice. However, we did receive additional information about the species in response to requests for specific information that were made (by the USFWS) directly to biologists familiar with the species. A draft of the 5-year review was peer reviewed by three experts familiar with the plant (see Appendix A). No part of the review was contracted to an outside party. Comments received on this review were evaluated and incorporated as appropriate.

### B. Reviewers.

**Lead Region**: Southeast Region, Erin Rivenbark (assisting in recovery), 706/613-9493 ext. 234; Kelly Bibb 404/679-7132

**Lead Field Office**: Asheville ESFO, Asheville, North Carolina – Carolyn Wells (originating author; moved to a new office and position), Mara Alexander (new lead) 828/258-3939, Ext. 238.

### C. Background:

1. Federal Register Notice citation announcing initiation of this review: July 6, 2009 (74 FR 31972)

### 2. Species status:

Declining. The remaining extant populations continue to be threatened by recreational use or poaching.

#### 3. Recovery achieved:

1 (1 = 0.25 percent of species' recovery objectives achieved).

### 4. Listing history

**Original Listing** 

FR notice: 52 FR 44397

Date listed: November 19, 1987

Entity listed: species Classification: threatened

### 5. Review History:

The Service conducted a five-year review for Heller's blazing star in 1991 (56 FR 56882). In this review, the status of many species was simultaneously evaluated with no in-depth assessment of the five factors or threats as they pertain to the individual species. The notice stated that the Service was seeking any new or additional information reflecting the necessity of a change in the status of the species under review. The notice indicated that if significant data were available warranting a change in a species' classification, the Service would propose a rule to modify the species' status. No change in the plant's listing classification was found to be appropriate.

Recovery Plan: 2000

Recovery Data Call: 2013 - 1998

**6.** Species' Recovery Priority Number at start of 5-year review (48 FR 43098): 8 (a species with a moderate degree of threat and a high recovery potential)

### 7. Recovery Plan:

Name of plan: Recovery Plan for *Liatris helleri* T.C. Porter (Heller's blazing

star)

**Date issued**: January 28, 2000 (1<sup>st</sup> revision)

**Dates of previous plans, if applicable**: May 1, 1989 (Original)

#### II. REVIEW ANALYSIS

A. Application of the 1996 Distinct Population Segment (DPS) policy: The Endangered Species Act (ESA) defines species as including any subspecies of fish or wildlife or plant, and any distinct population segment (DPS) of any vertebrate fish or wildlife that interbreeds when mature. This definition limits listing a DPS to only vertebrate species of fish and wildlife. Because the species under review is a plant, the DPS policy does not apply.

### B. Recovery Criteria

1. Does the species have a final, approved recovery plan containing objective, measurable criteria? Yes.

### 2. Adequacy of recovery criteria.

- a. Do the recovery criteria reflect the best available and most up-to date information on the biology of the species and its habitat? No. The recovery criteria are based upon a global distribution of eight extant populations; there are now 11 extant populations of the species (Appendix B, Table B.1). More significantly, Nesom (2005) has questioned whether *Liatris helleri* T.C. Porter (1891) and *L. turgida* Gaiser (1946) are valid and distinct species, proposing that these should be treated as a single taxon (*L. helleri*, because this name has nomenclatural seniority). This issue has not been resolved but is discussed in Section II. C. 1. d. (Taxonomic classification or changes in nomenclature).
- b. Are all of the 5 listing factors that are relevant to the species addressed in the recovery criteria? Yes. The existing recovery criteria could not be met without addressing the four listing factors identified as significantly affecting the status of the species in the listing rule (habitat loss, overutilization, the inadequacy of existing regulatory mechanisms, and other natural or manmade factors). There are no new threats affecting the species beyond those mentioned in the listing rule and the recovery plan, although some existing threats to the species are or appear to be increasing in severity and scope (e.g., poaching and drought). Accelerated global climate change is expected to exacerbate those threats already identified. Threats are discussed in Section II. C. 2. (Five-Factor Analysis).
- 3. List the recovery criteria as they appear in the recovery plan, and discuss how each criterion has or has not been met, citing information:

*Criterion 1: The eight extant populations are protected.* 

Criterion has been met as currently worded, but should be reevaluated to consider all extant populations (now 11; Appendix B, Table B.1) when appropriate. This increase in the number of known populations is a result of the discovery of two new populations, and a revision to the delineation of three populations counted in the recovery plan. One of the three populations delineated and counted differently than in the recovery plan is here regarded as three separate populations due to the distance among occupied locations (all are within Linville Gorge), and two other populations counted separately in the recovery plan are here treated as a single population due to their proximity (at Grandfather Mountain).

Eight of the 11 extant populations of *Liatris helleri* are in a form of protective ownership by federal or state agencies, or private conservation partners (Table B.1). The remaining three occur on private lands and are not subject to any form of protection.

Criterion 2: Any necessary management actions have been undertaken for these populations by the landowners or cooperating agencies and it has been documented that this management is successfully ensuring the continued survival of these populations.

Criterion not met. Management is not occurring at any of the three populations in private ownership. At the eight protected populations, management activities primarily consist of attempts to control recreation-related impacts through interpretive materials and/or physical barricades intended to keep the recreating public on established trails or boardwalks. These efforts have been initiated within significant portions of two populations (Linville - Chimneys/Table Rock and Grandfather Mountain). Additional management of encroaching woody vegetation is occurring within NPS-BRP owned portions of the Grandfather Mountain population (Chris Ulrey, NPS, personal communication, 2009). The remaining populations are not subject to active management.

The primary difficulty in satisfying this criterion results from a lack of documentation that existing levels of management (or lack thereof) are successfully maintaining these populations. Most sites for which monitoring data are available appear to have experienced declines in recent years (Table B.2, column "Clump Trends"). However, as discussed in Section II. C. 1. b. (Abundance, population trends, demographic features), available data are generally inadequate to objectively evaluate population trends. One of the more recent and better documented declines occurred in 2009, when two subpopulations were poached with 10-60% of adult plants illegally removed (Ulrey 2009, Kauffman 2009 and 2010). This poaching activity was discovered in conjunction with annual demographic monitoring conducted by NPS-BRP personnel. Without routine site visits, this impact would likely have gone undetected; without the marking of individual plants associated with this demographic data collection, the actual number of plants that were missing could not have been determined. Poaching represents a unique management challenge in that it is difficult or impossible to anticipate. Nonetheless, in 2009, this threat resulted in significant declines (perhaps as great as 40-60%, if all missing plants are assumed to have been poached) well above those attributable to any other recognized threat. Threats are discussed in Section II. C. 2. (Five Factor Analysis).

Criterion 3: Through introduction and/or discovery of new populations, at least one additional self-sustaining population exists within the species' historical range (it is believed that at least nine populations are required to ensure that the species will not become endangered in the foreseeable future).

Criterion not met. Two additional populations have been discovered since the latest revision of the recovery plan (USFWS 1999). However, these

populations are unlikely to be self-sustaining: one (Dun Vegan Mountain) has been estimated to contain only 15-20 clumps, and the other (Lost Cove Cliffs) was poached in 2009, and is currently estimated to contain no more than 55 clumps (Gary Kauffman, USFS, personal communication, 2010).

There have been no attempts to create new populations by introducing the species to new, unoccupied habitats. Portions of two populations have been augmented on one or more occasions: the Linville Gorge-Table Rock subpopulation, and five subpopulations within the larger Grandfather Mountain population (NCNHP 2010). In all instances, plants used for augmentation were grown from seed collected on-site. Augmentation efforts occurred in three episodes: the first in or around 1994, the second (at a single subpopulation) during the years 1999-2006, and the third in 2007.

In the first set of augmentation experiments (conducted in 1994), 999 seedlings were out-planted at Linville Gorge-Table Rock (Burke County) and five subpopulations within the larger Grandfather Mountain population (Avery County). Early observations from these experiments suggested high rates of survivorship among transplants placed at Grandfather Mountain, with NPS personnel reporting 89% survival after six weeks (NCNHP 2010). Unfortunately there appears to have been no attempt to follow up on transplant survivorship after the first field season. In most cases, the number of transplants originally placed into these subpopulations is unknown and augmented plants can no longer be distinguished from the original set of resident, native plants. As a result, the long-term survival of these augmented individuals, and the success of this effort, cannot be determined.

The Hang Glide Cliff subpopulation at Grandfather Mountain was augmented in 1999, with follow-up augmentation trials conducted between 2003 and 2006. Reports from the 1999 attempt are contradictory, with one source reporting either 27 or 38 plants placed out at this subpopulation that year (NCNHP 2010). In either case, 13 transplants were reported alive here in 2001. A second augmentation attempt occurred between 2003 and 2006; however, the number of *L. helleri* individuals planted during this time period is similarly unclear. Based upon information in the AFO files, the total number of transplants is likely to be less than 20 individuals. Additional investigation is needed to evaluate the current status of these prior augmentation efforts, and the number of *L. helleri* individuals remaining at this subpopulation (NCNHP 2010, Donaldson 2002a, Donaldson 2002b).

In 2007, three subpopulations within the Grandfather Mountain population were augmented by NPS-BRP personnel (NCNHP 2010). These subpopulations were among the five subpopulations augmented in the mid 1990s. In 2007, a total of 85 plants were placed out across these three subpopulations; as with the earlier round of augmentation trials, all plants were grown from seed collected from the same subpopulation into which the

greenhouse plants were placed. Transplanting occurred in August amidst dry, hot weather. Transplants did not receive supplemental watering, and transplant locations were recorded with a high accuracy (2-3 cm) rangefinder. All transplants were located within areas previously burned using prescribed fire. As of the 2009 growing season, only 28% of these transplants were still alive (Ulrey 2010a). This high mortality rate may be due to very dry and hot conditions at the time of transplanting.

Criteria for self-sustaining populations have not been developed for *L. helleri*.

Criterion 4: All nine populations and their habitat are protected from present and foreseeable human-related and natural threats that may interfere with their survival.

Criterion not met. All populations and their habitat are not protected from present and foreseeable threats that may interfere with their survival. Unmanaged or inadequately managed recreational use, poaching, feral goats, and vegetation succession remain ongoing threats at most populations (Chris Ulrey, NPS, personal communication, 2010; Gary Kauffman, USFS, personal communication, 2010; NCNHP 2010). Drought has recently been implicated in declines at some sites (Chris Ulrey, NPS, personal communication, 2010), and climate change is expected to exacerbate this and likely many other threats. Narrow-ranging endemics with limited dispersal capabilities (like *L. helleri*) are likely to be disproportionately impacted by these changes. Threats are discussed in Section II.C.2 (Five Factor Analysis).

## C. Updated Information and Current Species Status

### 1. Biology and Habitat

### a. New information on the species' biology and life history:

The recovery plan discusses the pioneer habit of *L. helleri*, and calls brief attention to the beneficial role of fire in the maintenance of suitable habitat for other *Liatris* species. There is little empirical data on the specific responses of *L. helleri* to fire, but NPS-BRP is using prescribed burns to selectively control encroaching woody vegetation at occupied sites. Prescribed burns were conducted at three of four subpopulations in 2005 and again in 2007 (the 2005 burns did not carry well and did not achieve the desired intensity). The purpose of these burns was to set-back the succession of associated species that threaten to competitively displace *L. helleri*. NPS personnel reported that this prescribed burning was followed by marked increases (of 60 to 202%) in the number of flowering stems produced by adult *L. helleri* plants (NCNHP 2010).

The Linville Gorge-Shortoff Mountain population (in Burke County) affords another opportunity to learn more about the responses of L. helleri to fire. In 2007, a wildfire burned portions of this population; post-fire surveys indicate that fire severity was high enough (in some locations) to consume encroaching vegetation and/or expose mineral soils. These fire effects may be beneficial to L. helleri, possibly helping to induce seed germination and/or seedling recruitment in this species. However, baseline (pre-fire) data are lacking for this population; therefore, the capacity to detect changes in the population and attribute them to the 2007 wildfire is rather limited. The USFS initiated an Environmental Assessment (EA) scoping process to help continue prescribed burning in the Wilderness Area of Linville Gorge. The scoping letter was completed in May 2012. The goal is to expand potential habitat via large scale burning and exotic invasive species management. Herbicides are a critically needed component of management here because of the rampant spread of fire-tolerant and/or fire-adapted invasive exotic species like Paulownia tomentosa (Princess Tree), whose infestations are expanding in the wake of the 2007 wildfire. These management actions have the potential to significantly benefit L. helleri as well as Hudsonia Montana (mountain golden heather), a second federally-listed species with which it co-occurs in the Linville Wilderness.

# b. Abundance, population trends (e.g. increasing, decreasing, stable), demographic features, or demographic trends:

The USFWS reviewed the database of the North Carolina Natural Heritage Program (NCNHP) to determine the best available estimates of population size for extant populations of *Liatris helleri* (NCNHP, 2010). The USFWS does not maintain its own database of known locations of *L. helleri*; instead it regards the NHP databases as the best repository for this information. In recent years, NatureServe and its member Natural Heritage Programs have devised mapping standards to balance the need for fine-scale, highly site-specific element occurrence records (EORs) with the need to aggregate EORs into meaningful units of conservation interest that approximate biological populations (NatureServe, 2004).

The 11 extant populations recognized by USFWS are mapped as nine standalone and two parent Element Occurrence Records (EORs) by NCNHP (Appendix B, Tables B.1 and B.2). NCNHP recognizes an additional 17 sub-EORs nested within the two parent records created for the Grandfather Mountain and Linville Gorge Chimneys/Table Rock populations (Table B.1); for discussion purposes, these are best regarded as subpopulations or spatially discrete patches of the species. Therefore, each of the populations recognized by USFWS corresponds to either a parent or stand-alone EOR as mapped by the NCNHP.

Most EORs (whether a parent, stand-alone, or sub-EOR) consist of numerous discretely mapped sites, and it is rare to have estimates of abundance that cover a representative portion of the EOR in any given year (frequently the observations pertain to only a part of the larger mapped area). It is also infrequent for site surveys to be conducted by the same individual from one year to the next, and even less common for observations to apply to the same spatial extent or to represent equivalent levels of survey effort. As a result of these many factors, differences in size estimates within or among EORs must usually be interpreted with considerable caution. Despite these issues, the USFWS regards the NCNHP database as the best available centralized repository for tracking observation data in rare species, and continues to work with partners to get updated observation data into the NCNHP database so that it will inform assessments such as this five year review.

Estimates of abundance vary from partial surveys yielding very coarse estimates of clumps (most locations) to highly precise counts of tagged plants (e.g., the four subpopulations within the Grandfather Mountain population monitored by the NPS-BRP). Individual sites have been estimated to contain anywhere from one to more than 700 clumps over the years; collectively, the 11 extant populations recognized for purposes of this review are unlikely to contain more than a few thousand individuals. It is not possible to arrive at a more precise estimate of the total number of individuals across the range due to the limitations in available data described above.

Population trends in L. helleri are generally unknown because monitoring is simply not occurring at a scale that can be reliably extrapolated to entire populations. Most "monitoring" data consist of casual site visits in which the number of *L. helleri* plants has been coarsely estimated within a small portion of the larger population (usually corresponding to a sub-EOR as mapped by the NCNHP). The 11 parent- or stand-alone EORs mapped by NCNHP depict a total of 26 spatially discrete locations where L. helleri is known to occur (Table B.2). The last reported observation for 11 of these 26 records occurred before 2000 (NCNHP 2010; Appendix B, Table B.2). Fifteen of the 28 records have three or fewer years of any recorded observations (even presence/absence); only nine have three or more years in which the number of plants (clumps) was estimated. Factoring in these significant caveats, available data suggest that nine locations (meaning sub- or stand-alone EORs) may be declining, four locations may be increasing, and only two locations appear at least somewhat stable (Table B.2). Trends for the remaining 12 records are not possible to infer with any degree of confidence, given the nature of available data.

When NHP EOR data is aggregated by the population boundaries recognized by USFWS (Tables B.1 and B.2), four of the 11 extant populations appear to have declined from historical levels (Linville-Chimneys/Table Rock, Lost

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<sup>&</sup>lt;sup>1</sup> This tally (26) excludes the two parent EORs which serve as a database to aggregate smaller EORs.

Cove Cliffs, Three Top, and Bluff Mountain) and significant portions of a fifth (Grandfather Mountain) also appear to have declined. Only two populations appear relatively stable (Paddy Mountain and Blowing Rock), and one population (Linville-Hawksbill) may have increased. Trends are unknown for the remaining populations.

Demographic data collection is occurring within portions of three populations (Grandfather Mountain, Lost Cove Cliffs, and Paddy Mountain; Appendix B, Table B.1). NPS-BRP initiated demographic data collections at four subpopulations within the larger Grandfather Mountain population in 2004. This effort has progressed to the point that most resident adult plants (clumps) have now been tagged, and their survival and reproduction is monitored annually (Ulrey 2010b). The ultimate objective of this study is to produce a Population Viability Analysis for *L. helleri*; however, this modeling effort will require several more years of data. Only two years of demographic-level data exist for the remaining two populations (Lost Cove Cliffs and Paddy Mountain), from the 2006/2009 and 2009/2010 field seasons, respectively. Because of the preliminary nature of the data for these latter two populations, the remainder of this discussion of demographic trends is drawn almost exclusively from data obtained for NPS-BRP sites.

In 2009, one of the four NPS subpopulations was poached, with 10% (n=12) of adult plants removed illegally (as evidenced by holes left in their place) and another 50% (n=53) possibly poached (Ulrey 2009). The theft of these plants was discovered in conjunction with NPS's annual monitoring efforts. In response to NPS's findings, USFS visited one of their subpopulations and discovered it to have been poached as well, with perhaps as much as 59.5% (n=46) of adult plants illegally removed from that location (Kauffman 2009). It is not known whether or not additional subpopulations across the range of the species were targeted by this illegal activity. For the two subpopulations that were poached, the impacts are quite significant given the exceedingly low rates of seedling recruitment observed in this species. Augmentation (to return the population to pre-poaching levels) remains an option, but has not yet been initiated.

The four NPS subpopulations at Grandfather Mountain collectively contained 361 plants in 2009, down from 400 plants recorded as alive in 2008. This reduction is partially (and perhaps largely) attributable to the poaching that occurred in 2009. Prior to this poaching event, demographic data suggest that *L. helleri* tends to exhibit variable rates of adult mortality accompanied by extremely low rates of seedling recruitment (Ulrey 2010b). When averaged across all years (2004-2009) and all sites (n=4), the average annual rate of adult plant mortality is 22%. This average excludes any plants simply recorded as "lost"—therefore, the mortality rate may be higher still. When examined in greater detail, the percentage of the preceding year's adult plant population recorded as dead the following season has ranged from a low of

5.5% (one subpopulation, in 2006) to a high of 49% (excluding the subpopulation that was poached in 2009, in which adult mortality was 69.9% that year). Since 2004, the maximum number of seedlings observed at any subpopulation is 22. In most years, no seedlings were reported by NPS personnel; however, exhaustive seedling surveys have not been conducted at every monitoring site in every year. When averaged across all years (2004-2009) and all sites (n=4), the average percentage of adult plants (clumps) showing evidence of flowering is 27.2%. In any given year at any given site, the percentage of plants (clumps) flowering has varied from a low of 12% to a high of 53%. The number of flowering stems varies from less than four to more than 200% of the number of adult clumps (NCNHP 2010). As noted previously, flowering appears to be stimulated by burning, with NPS personnel reporting increases in the number of flowering stems anywhere from 60-200% following prescribed burns (NCNHP 2010).

Overall, interim data from the NPS demographic data collection effort indicates that three of the four subpopulations have declined relative to the largest number of clumps recorded at each subpopulation (Ulrey 2010b). This finding particularly stresses the importance of routine monitoring data when attempting to infer trends. There is little reason to assume that the other populations not undergoing regular monitoring are more stable than those being closely followed by NPS.

# c. Genetics, genetic variation, or trends in genetic variation (e.g., loss of genetic variation, genetic drift, inbreeding, etc.):

(Although this section summarizes information that was available and referenced in the recovery plan, it is provided here as background information for subsequent sections.)

Godt and Hamrick (1996, 1995) examined genetic variation and outcrossing rates in *Liatris helleri* using allozymes. These authors observed high levels of genetic diversity in this species, with levels averaging three times that typically exhibited by other narrow-ranging endemic plants (Godt and Hamrick 1996). Godt and Hamrick offer three possible explanations for this result: (1) recent derivation from a highly polymorphic species, (2) introgression of genes via hybridization, or (3) a recent range restriction accompanied by drastic reductions in population size. The authors go on to state that their data provide no evidence for hybridization; however, they did not investigate this question directly (no other *Liatris* spp. were evaluated in this study).

Godt and Hamrick (1996) observed patterns of genetic structure that suggested low rates of gene flow between populations, and speculated that the elevation gradients separating sites may serve to limit pollinator movement as well as the dispersal of viable seed. They also noted that viable seed is

increasingly less likely to be dispersed into suitable habitat upon leaving the source population, given that the rock outcrops where *L. helleri* occurs are typically embedded in a forested landscape containing habitat conditions generally unfavorable to this species.

These authors characterized the amount of genetic variation among *L. helleri* populations (15.9%) as intermediate between the means for outcrossing, animal-pollinated species (19.7%) and wind-pollinated outcrossers (9.9%; Hamrick and Godt 1989). They note that direct estimates of outcrossing rates suggest that *L. helleri* may be self-incompatible (Godt and Hamrick 1995).

### d. Taxonomic classification or changes in nomenclature:

Nesom (2005) has proposed that *Liatris helleri* T.C. Porter (1891) and *L. turgida* Gaiser (1941) do not represent distinct taxa, and should be combined under the name *Liatris helleri* T.C. Porter (1891) (which has nomenclatural priority). Nesom's analysis was based upon inspection of herbarium specimens, which revealed considerable variation in the primary diagnostic character used to distinguish *L. helleri* from *L. turgida* (pappus length). These observations are consistent with those of numerous field botanists who have long puzzled over the atypically long pappus and subsequent difficulties in assigning identity to some populations of *L. helleri* (e.g., Sutter and Murdock, 1984).

L. turgida is an Appalachian endemic of lower elevation montane habitats (2300-4250 ft. in elevation) in West Virginia and Virginia, with infrequent populations in North Carolina, Alabama and Georgia (Nesom, 2005). In North Carolina, L. turgida Gaiser is typically found at lower elevations than L. helleri sensu stricto, however the two come in close proximity and may co-occur at Linville Gorge in Burke County. If L. turgida were to be subsumed within L. helleri, the number of known populations would increase perhaps five-fold or more. Threats to the continued existence of the new taxon (L. helleri T.C. Porter (1891) sensu Nesom (2005)) would be significantly lessened when evaluated across that entity's entire range. Thus, if adopted, this nomenclatural change would likely appreciably reduce the justification for retaining L. helleri on the federal list of endangered and threatened species.

Nesom's analysis was based on the inspection of herbarium specimens, and was not accompanied by genetic analyses - although he interprets the results from Godt and Hamrick (1996) as providing indirect support for his nomenclatural revision. As previously noted, Godt and Hamrick did find higher than expected levels of allozyme variation within populations of *L. helleri* T.C. Porter (=*L. helleri* sensu stricto), but they did not evaluate the degree of genetic similarity (or dissimilarity) between *L. helleri* and *L. turgida*.

The Service and many of its conservation partners are of the opinion that additional investigation is needed before Nesom's proposed nomenclatural change is fully adopted (Alan Weakley, UNC Herbarium, personal communication, 2010; Gary Kauffman, USFS, personal communication, 2010; Chris Ulrey, NPS, personal communication, 2010).

Researchers at Appalachian State University (ASU) initiated a project in August 2010 to explicitly examine genetic differentiation among L. helleri T.C. Porter and L. turgida Gaiser, and the potential for hybridization between these two species (Sullins, 2010). By comparing the level of genetic variation between DNA sequences, examining whether or not the species will hybridize, and further comparing the morphology of these species, this study should provide valuable assistance in determining whether or not the two species are in fact more appropriately regarded as a single taxon. The Service is supporting the project by providing technical assistance in the identification of desirable sample sites and the refinement of key questions to be addressed by this project. Sullins sequenced individuals from both L. helleri (from nine populations) and L. turgida (from six populations). In his research so far, he sees some divergence between the two groups, although the groups also share two haplotypes. Each group has unique chlorotypes which are diagnostic to either species, meaning they are not found in both groups, but there are two chlorotypes that occur in both species. This is typically explained by either hybridization between the two species, or incomplete lineage sorting. Given the geographic distances between the sites that share the haplotypes, hybridization seems like an unlikely explanation. Incomplete lineage sorting seems more plausible and consistent with the fact that the flower morphology is similar as well. Final results are not anticipated for another year; therefore, the Service expects to reach resolution on this issue in the next five year review for this species.

e. Spatial distribution, trends in spatial distribution, or historic range (e.g. corrections to the historical range, change in distribution of the species' within its historic range, etc.):

The recovery plan recognized eight extant populations of *Liatris helleri* (USFWS 1999). As of 2013, there are 11 extant populations of this species (Appendix B, Table B.1). This increase results from the discovery of two new populations (Dun Vegan Mountain and Lost Cove Cliffs, both in Avery County), and a revision to the delineation of three populations counted in the recovery plan: one of these populations is here regarded as three separate populations due to the distance among occupied locations (all are within Linville Gorge), and two populations counted separately in the recovery plan are here treated as a single population due to their proximity (at Grandfather Mountain).

Therefore, the total distribution of the species consists of 11 extant and two extirpated populations. The extant populations occur in the following North Carolina counties: Ashe (3 populations), Avery (3 populations), Burke (3 populations), Caldwell (1 population), and one population that spans the Avery/Watauga county line. The extirpated populations occur in Avery (Beech Mountain) and Mitchell (Roan Mountain) Counties, North Carolina.

No new counties have been added to the distribution of the species since the listing rule or recovery plan were published. No corrections to the historic range are needed. The level of habitat fragmentation and availability of corridors are not significantly different than when the species was first federally listed.

### f. Habitat or ecosystem conditions:

Liatris helleri is endemic to the Blue Ridge Mountains of western North Carolina, with populations in Ashe, Avery, Burke, Caldwell, and Watauga Counties. Throughout its limited range, *L. helleri* occurs at mid- to high elevations (3,500 to 6,000 feet), typically associated with sparsely vegetated rock formations located on outcrops, cliffs, or ledges. These rocks are typically igneous (volcanic) and metasedimentary, with shallow, acidic soils (pH 4). Occupied habitats are usually exposed to high winds and abundant sun. *L. helleri* frequently co-occurs with other rare plant species also endemic to the Southern Blue Ridge, many of which are federally listed, including *Geum radiatum* (spreading avens), *Gymnoderma lineare* (rock gnome lichen), *Hedyotis purpurea var. montana* (Roan Mountain bluet), and *Solidago spithamaea* (Blue Ridge goldenrod). In the Linville Gorge, *L. helleri* co-occurs with *Hudsonia montana* (mountain golden heather), another federally listed plant species.

Mid to high elevation rock outcrops are a distinctive feature of the southern Appalachian landscape, but are limited in extent and distribution. They occur, spatially isolated, within a forest matrix of spruce-fir, northern hardwoods, high elevation red oak, or (in the case of Linville Gorge) xeric pine-oak heath. Schafale and Weakley (1990) recognize several types of mid to high elevation rock outcrop communities in North Carolina. Those colonized by *L. helleri* would be typed as High Elevation Rocky Summits, High Elevation Granitic Domes, Montane Acidic Cliffs, or High Elevation Mafic Glade (one example, at Bluff Mountain).

Unfortunately, there is no robust, quantifiable estimate of the amount of mid to high elevation rock outcrop habitat across the southern Appalachians, or North Carolina in particular. Rock outcrops, cliffs and overhangs are a specialized habitat that occupy discrete and usually small patches within an otherwise forested landscape. Because these rock and cliff systems can frequently occur as small, nearly vertical outcroppings of exposed bedrock at

least partially obscured by a forest canopy, they are inherently difficult to detect using remotely sensed imagery.

As previously noted, eight of the 11 extant populations of *L. helleri* are in protective ownership by federal or state agencies, or conservation partners. This land ownership provides protection from habitat conversion (to commercial or residential development), but does not inherently protect *L. helleri* from one of its most significant threats – recreational use, and specifically trampling. The high elevation rock outcrops where this species occurs afford spectacular scenic views, and as such are popular destination points.

While recreation-related threats present challenges in the near term, accelerated climate change presents a substantial threat to the long-term viability of mid- to high-elevation species like *L. helleri*. Although models of future climate scenarios are not yet available at a resolution conducive to site-specific planning, it is reasonable to expect significant shifts in the very temperature and precipitation patterns that define the climatic extremes to which species such as *L. helleri* have become adapted. It remains to be seen whether or not these changes will exceed the adaptive capacity of this species and the numerous others that comprise the signature flora of southern Appalachian rocky summits, cliffs and ledges.

### 2. Five-Factor Analysis -

# a. Present or threatened destruction, modification or curtailment of its habitat or range:

Liatris helleri was federally listed due to concerns about its limited distribution, small number of known populations, and small population sizes, as well as commercial, residential, and recreational development within areas of occupied habitat (52 FR 44397). The construction of trails, viewing platforms, roads, and buildings was implicated in the decline of some populations, as was trampling by recreational users. The listing rule identified residential development and heavy recreational use as primary factors in the extirpation of two populations.

Eight of the 11 extant populations of *L. helleri* occur on land managed by federal or state natural resource agencies or private-sector conservation partners. The remaining three populations occur on unprotected private land. Two populations are apparently extirpated, with one of these (Roan Mountain) known only from an herbarium specimen dating to 1894.

A principal source of habitat destruction affecting *L. helleri* is the recreating public, who venture out into the species' habitat in search of high elevation views, adventurous rock climbing or boulder-hopping opportunities, or just a

flat and sparsely vegetated picnic spot. Regardless of the reason, trampling compacts the plant's rhizome and can shear plants from the rocks in which they are anchored. In the process, soils that have developed over geologic time frames can also be destroyed, making recolonization of these sites (by this or other species) exceedingly difficult.

Unfortunately, protection of sites through public ownership can (and usually does) lead to increased visitation by the recreating public, thereby increasing the potential for impacts from trampling or construction of recreation-related facilities. Across the range of the species, many subpopulations occur within inches of established paths and popular destination points frequented by visitors who are largely unaware of the destructive potential from a single footstep. Passive interpretation involving the use of signs and physical barricades has proven moderately successful.

NPS-BRP conducted a study in which patterns of visitor use were characterized and quantified using hidden infra-red trail counters stationed near populations of federally listed plant species, including L. helleri (Ulrey, 2004). At all of the study sites, visitor use is limited or restricted through barricades, signage, or site closures intended to specifically minimize impacts to rare plant species and sensitive habitat. The combination of measures in place at these L. helleri subpopulations is more rigorous than at any other population of this species. Yet despite these measures, this study documented an overall average of 14% of visitors entered closed areas (corresponding to the frequency that a visitor triggered a counter), amounting to an average of 3,000 visitor impacts when projected over the visitor season. Use of digital trail counters (equipped with time stamps) enabled NPS staff to identify peak times of visitor impacts (typically Saturdays); uniformed patrol was effective at reducing visitor impacts by 62%. The study concluded with recommendations for additional measures such as increased/improved signage.

A related concern stems from the construction of facilities intended to control or direct visitor use. These facilities must be sited and constructed appropriately in order to avoid impacts to *L. helleri*. Numerous populations of the species exist in extremely close proximity to boardwalks or roped trails; maintenance of these facilities must be conducted in a manner that does not damage the plants found immediately adjacent to the boardwalk or trail. Landowners should discourage the construction of trails directing visitors to the populations. Periodic monitoring of all sites is needed in order to ensure that visitor access is not posing a problem, and that populations of *L. helleri* are not succumbing to this or other threats. At present, regular monitoring is only occurring within a portion of a single population (NPS-owned portions of Grandfather Mountain), although USFS initiated monitoring at a portion of a second population (Lost Cove Cliffs) in 2005 and the North Carolina Plant Conservation Program initiated monitoring at a third (Paddy Mountain) in

2009. Regardless, available data and ongoing monitoring efforts across the range of the species are largely inadequate for providing an early indication of recreation-related impacts to *L. helleri* (or impacts from any other source). The potential for these impacts is quite significant at some locations: the Grandfather Mountain Biosphere Reserve is estimated to receive some 250,000 visitors a year (Pope 2010).

# b. Over utilization for commercial, recreational, scientific, or educational purposes:

This factor was identified as a potential threat to *Liatris helleri* in the listing rule, due to the attractive nature of this plant. Threats due to recreation are discussed above under Factor A.

In 2009, two subpopulations of L. helleri were discovered to have been the target of poaching activity. The first instance was discovered by NPS personnel in conjunction with their annual monitoring activities: at this site, 10% (n=12) of adult plants were confirmed as definitively poached (as evidenced by holes left in their place) and another 50% (n=53) were regarded as having possibly been poached (Chris Ulrey, NPS, personal communication, 2010). In response to NPS's findings, USFS visited one of their subpopulations and discovered it to have been poached as well, with perhaps as much as 59.5% (n=46) of adult plants illegally removed from that location (Gary Kauffman, USFS, personal communication, 2010). It is not known whether or not additional subpopulations across the range of the species were targeted by this illegal activity. For the two subpopulations that were poached, the impacts are quite significant given the exceedingly low rates of seedling recruitment observed in this species.

### c. Disease or predation:

This factor was not regarded as a significant threat to the species in the listing rule or recovery plan, and the USFWS has no additional information to suggest that it now poses a threat to *Liatris helleri*.

### d. Inadequacy of existing regulatory mechanisms:

This was acknowledged as a threat in the listing rule and recovery plan, and remains a threat to the species. The North Carolina Plant Conservation and Protection Act (NC State Code Article 19B, § 106-202.12) provides limited protection from unauthorized collection and trade of plants listed under that statute. However, this statute does not protect the species or its habitat from destruction in conjunction with development projects or otherwise legal activities. State laws protecting rare plant species have limited authorities, and North Carolina rare plant statutes do not protect the species from habitat destruction from recreational use on federal lands (where many populations

occur and remain vulnerable to this threat).

## e. Other natural or manmade factors affecting its continued existence:

Accelerated global climate change is likely to disrupt patterns of climate variability to which *Liatris helleri* has become adapted, and as such is likely to exacerbate threats already mentioned. In 2010, NPS (Blue Ridge Parkway) personnel reported significant mortality of adult plants, seemingly as a result to prolonged and extreme drought (Chris Ulrey, NPS, personal communication, 2010). The higher temperatures expected under most global climate change models would appear likely to exacerbate this threat. However, the current scale of most global models of climate change offers little insight into the changes that will likely occur on southern Appalachian high peaks.

### D. **Synthesis** –

The status of *Liatris helleri* has not appreciably changed since the 2000 recovery plan. The species occurs at eleven extant populations distributed across five western North Carolina counties. All populations are threatened by uncontrolled visitor use (trampling), which has resulted in demonstrable declines to the species and its habitat. Poaching occurred at two subpopulations in 2009; with between 10 to 60% of established adult plants being illegally removed from each site. An associated threat is the construction of recreation-related facilities within the species' habitat. Intended to manage visitor use, if poorly sited, such facilities can be constructed within areas of occupied habitat. Vegetation succession and drought are reported threats at many sites. Accelerated climate change could exacerbate threats already affecting the species. Available genetic data suggests that the species is self-incompatible, and may exhibit low rates of gene flow (Godt and Hamrick 1995a). These life history traits do not suggest this species is likely to colonize new sites rapidly.

A recent proposal (Nesom 2005) to broaden the taxonomic treatment of *Liatris helleri* T.C. Porter needs further investigation. The Service is supporting an ongoing genetic analysis through Appalachian State University (ASU), which is specifically investigating genetic distances between *L. helleri* T.C. Porter and *L. turgida* Gaiser – the taxa which Nesom has suggested should be combined. Collection of genetic samples for the ASU study began in August 2010 and preliminary results show some divergence between the two groups, although the groups also share two haplotypes; the results from this study will be evaluated in conjunction with other data during the next five year review for this species. At the present time, the Service continues to regard the listed taxon as valid. Results from the ongoing genetic analysis are anticipated within the next year; the Service intends to reach resolution on this issue in the next five year review for this species.

The existing recovery criteria are objective and measurable, and generally reflect the best available information on threats to the species and its habitat. No change in the species' status is currently recommended.

#### III. RESULTS

A. Recommended Classification:
\_X No change is needed

### IV. RECOMMENDATIONS FOR FUTURE ACTIONS

These actions are listed in order of priority, and cross-walked to tasks identified in the recovery plan, where appropriate.

- 1. Continue support for the ongoing genetic analysis being conducted by Appalachian State University, assisting with identification of sample sites and refinement of questions to be addressed. Ensure that relevant field observations made during the collection of genetic samples are reported to the NCNHP for incorporation into site records (EORs).
  - (*Recovery Task 5.2*) Prepare articles for popular and scientific publications.
- 2. Assist landowners or other knowledgeable sources in reporting existing backlogs of relevant observation data to the North Carolina Natural Heritage program, so that this repository of data contains the most accurate, complete and current information.
  - (*Recovery Task 2.1*) Determine population size [and stage class distribution] for all populations.
- 3. Specifically work with Grandfather Mountain Stewardship Foundation and Atlanta Botanical Garden to determine the number of *L. helleri* plants placed at Hang Glide Cliff subpopulation, and evaluate the success of previous augmentation trials conducted there.
  - (*Recovery Task 2.8*) Develop techniques for re-establishing populations in suitable habitat within the species' historic range.
- 4. Ensure that monitoring data is sufficient to assist in evaluating the relative stability of populations and the effectiveness of implemented management actions.
  - (*Recovery Task 1.1*) Develop interim research and management plans in conjunction with NPS, USFS, North Carolina state agencies, TNC and Grandfather Mountain Stewardship Foundation
  - (*Recovery Task 2.1*) Determine population size [and stage class distribution] for all populations.
- 5. Work with USFS and NPS to explore options for augmenting the subpopulations poached in 2009, to minimize the potential for population bottlenecks and long-term genetic implications.
  - (*Recovery Task 2.8*) Develop techniques for re-establishing populations in suitable habitat within the species' historic range.

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# U.S. FISH AND WILDLIFE SERVICE

# 5-YEAR REVIEW of Liatris helleri (Heller's blazing star)

Current Classification: Threatened
Recommendation resulting from the 5-Year Review:
Downlist to Threatened Uplist to Endangered Delist X No change needed
Appropriate Listing/Reclassification Priority Number, if applicable:
Review Conducted By: Carolyn Wells (originally) and Mara Alexander (completed final document), Asheville Ecological Services Field Office, Asheville, NC.  FIELD OFFICE APPROVAL:  Lead Field Supervisor, Fish and Wildlife Service
Approve Date 2/13/43
REGIONAL OFFICE APPROVAL:
Lead Regional Director, Fish and Wildlife Service
Approve 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2

### **Appendix A: Peer Review**

## Summary of peer review for the five-year review of *Liatris helleri* (Heller's blazing star)

- A. **Peer Review Method:** The Service circulated this review to staff of the National Park Service (Blue Ridge Parkway) (NPS-BRP), the U.S. Forest Service (National Forests in North Carolina), Grandfather Mountain Stewardship Foundation, the North Carolina Natural Heritage Program (NC NHP), and University of North Carolina at Chapel Hill. All of these individuals were selected due to their knowledge of the species.
- B. **Peer Review Charge:** Peer reviewers were asked to conduct a scientific review of technical information presented. Reviewers were not asked to review the legal status determination.
- C. **Summary of Peer Review Comments:** Comments were received from NPS-BRP, Grandfather Mountain Stewardship Foundation, and NC NHP.

NPS-BRP provided updated information on the survival of transplants placed out at three subpopulations in August, 2007 and a correction to the year in which demographic monitoring was initiated at one population (Paddy Mountain).

Grandfather Mountain Stewardship Foundation largely corroborated statements in the draft document. Comments received from this review specifically addressed the issues of trampling and collection (of flowering stems) by the recreating public, and concomitant efforts by the Foundation to address these impacts through signage and uniformed personnel. This reviewer expressed full support for working with the Service to implement or expand formal monitoring of *L. helleri* populations on lands managed by the Foundation.

NCNHP provided comments clarifying the distinction between parent and sub- or standalone EORs, and asked for USFWS opinions on aggregating two stand-alone EORs under a common "parent" EOR (at Table Rock). This reviewer also noted additional protection mechanisms in place at some protected populations; and recommended that these be acknowledged in the final version of this document, to fully convey the layers of protection afforded to these sites/populations.

### D. Response to Peer Review:

Updated information on NPS-BRP transplant efforts and corrections to monitoring dates were incorporated as appropriate.

Comments from the Grandfather Mountain Stewardship Foundation were used to strengthen the discussion of trampling and other recreation-related impacts, as well as ongoing efforts to control these threats.

The discussion and counting of EORs was revised in response to comments received by NCNHP. NCNHP comments relaying additional protection mechanisms were incorporated into Table B.2 (Appendix B).

### **Appendix B: Tables**

Table B.1. *Liatris helleri* populations as recognized by FWS, cross-walked to Element Occurrence Records mapped by the North Carolina Natural Heritage Program (NHP).

Occurrence Records mapped by the North Carolina Natural Heritage Program (NHP).								
Population	County	Site name	NHP EO number <sup>a</sup>	Subpopulations	Land owner <sup>D</sup>			
Extant								
1	Burke	Linville – Shortoff	NCHP*030	5-6	USFS			
2	Burke	Linville – Chimneys/ Table Rock	NCHP*031.003- .004	6	USFS			
3	Burke	Linville – Hawksbill	NCHP*006	2	USFS			
4	Avery	Lost Cove Cliffs	NCHP*025	2	USFS			
5	Avery/ Watagua	Grandfather Mtn	NCHP*27.001, 27.002, 27.009, 27.011, 27.012, 27.013, 27.016, 27.017, 27.018, 27.019, 27.021, 27.022°, 27.023, 27.026, 27.028	20	Grandfather Mountain Stewardship Foundation; NCCWMTF; NCDPR; NPS-BRP; TNC; USFS			
6	Ashe	Three Top Mtn	NCHP*015 <sup>c</sup>	1	NCWRC			
7	Ashe	Bluff Mtn	NCHP*010 <sup>c</sup>	3	TNC			
8	Ashe	Paddy Mtn	NCHP*020 <sup>c</sup>	4	NCPCP			
9	Caldwell	Blowing Rock	NCHP*005	1	Private			
10	Avery/ Watauga	Hanging Rock	NCHP*008	1	Private			
11	Avery	Peak Mtn/Dun Vegan Mtn	NCHP*024	1	Private			
Extirpated								
12	Avery	Beech Mountain	NCHP*007	1	Private			
13	Mitchell	Roan Mountain	NCHP*014	1	USFS			

<sup>&</sup>lt;sup>a</sup> North Carolina Natural Heritage Program (NHP) Element Occurrence number (NCNHP, 2010).

<sup>&</sup>lt;sup>b</sup> Land owner abbreviations: NCCWMTF = North Carolina Clean Water Management Trust Fund (protection via easement); NCDPR = North Carolina Division of Parks and Recreation; NCWRC = North Carolina Wildlife Resources Commission; NCPCP = North Carolina Plant Conservation Program; NPS-BRP = National Park Service, Blue Ridge Parkway; TNC = The Nature Conservancy; USFS = U.S. Forest Service.

<sup>&</sup>lt;sup>c</sup> These sites are afforded additional protection as Dedicated Nature Preserves, a legally binding agreement held with the North Carolina Natural Heritage Program.

Table B.2. Summary of observation and trend data for extant Natural Heritage Program Element Occurrence Records (EORs) of Liatris helleria

FWS	EOR	YEAR LAST	TOTAL YEARS	TOTAL YEARS OF	CLUMPS	CLUMPS	CLUMPS	EO	COUNTY
POPULATION	NUMBER	OBSERVED	OF REPORTED	CLUMP COUNTS	(MAXIMUM) <sup>c</sup>	(MINIMUM) <sup>d</sup>	TREND <sup>e</sup>	RANK <sup>g</sup>	
NUMBER b			OBSERVATIONS						
1	030	2001	1	1	434	434	not available	A	Burke
2	31.003	2005	4	2	430	50	D?	В	Burke
2	31.004	2005	3	3	185	6	D?	В	Burke
3	006	2001	3	2	293	50	I?	В	Burke
4	025	2009	3	3	99	53	D	Е	Avery
5	27.001	2006	7	4	> 700	133	I?	A	Avery
5	27.002	2009	7	6	69	40	D	AB	Avery
5	27.009	2009	8	7	58	24	D	С	Avery
5	27.011	1990	4	2 <sup>f</sup>			not available	D?	Avery
5	27.012	1994	2	2	22	a few	I?	D	Avery
5	27.013	1991	1	1			not available	A	Avery
5	27.016	1991	1	1			not available	D	Avery
5	27.017	2001	3	2	400	48	D	С	Avery
5	27.018	1991	2	1	128	128	not available	AB	Avery
5	27.019	2009	9	6	154	58	D	С	Avery
5	27.021	1995	2	1	> 500	> 500	not available	A	Watauga
5	27.022	1994	1	0			not available	A	Watauga
5	27.023	1994	1	0			not available	BC	Watauga
5	27.026	2009	11	6	213	138	I	AB	Avery
5	27.028	1998	1	1	27 (38?)	27 (38?)	not available	Е	Avery

<sup>&</sup>lt;sup>a</sup> Primary source: NCNHP, 2010. Secondary sources: Kauffman, 2010; Ulrey, 2010b.

b This number corresponds to the FWS population number used in Appendix B, Table B.1.
c The *maximum* number of clumps reported for this site (EOR), regardless of year. Provided to give a coarse indication of relative size of the population (or subpopulation) at this location.

<sup>&</sup>lt;sup>d</sup> The minimum number of clumps reported for this site (EOR), regardless of year. Provided to give a coarse indication of the relative size of the population (or subpopulation) at this location.

Table B.2. Continued. a

FWS	EOR	YEAR LAST		TOTAL YEARS OF	CLUMPS	CLUMPS	CLUMPS	EO	COUNTY
POPULATION	NUMBER	OBSERVED		CLUMP COUNTS	(MAXIMUM) <sup>c</sup>	(MINIMUM) <sup>d</sup>	TREND <sup>e</sup>	RANK	
NUMBER b			<b>OBSERVATIONS</b>						
6	015	2001	6	2	1000	11	D	BC	Ashe
7	010	2009	5	5	235	36	D	В	Ashe
8	020	2009	6	2	500	200	S?	A?	Ashe
9	005	2007	6	3	100	100	S?	В	Caldwell
10	008	1989	2	1	22	22	not available	C	Avery, Watauga
11	024	1998	1	1	15-20	15-20	not available	Е	Avery

<sup>&</sup>lt;sup>a</sup> Primary source: NCNHP, 2010. Secondary sources: Kauffman, 2010; Ulrey, 2010b.

<sup>&</sup>lt;sup>e</sup> The apparent trend in number of clumps, taking into account the chronology of observations reported to NCNHP. "Not available" = trends not available from current data; "D" = decreasing"; "I" = Increasing. Question marks indicate significant uncertainty as to whether available data should be taken at face value.

f Although counts of clumps are available for two years, they apply to different portions of the site and therefore cannot be used to infer trends.

<sup>&</sup>lt;sup>g</sup> A = Excellent estimated viability/ecological integrity; B = Good estimated viability/ecological integrity; C = Fair estimated viability/ecological integrity; D = Poor estimated viability/ ecological integrity; E = Verified extant (viability/ecological integrity not assessed)

<sup>&</sup>lt;sup>b</sup> This number corresponds to the FWS population number used in Appendix B, Table B.1.

<sup>&</sup>lt;sup>c</sup> The *maximum* number of clumps reported for this site (EOR), regardless of year. Provided to give a coarse indication of relative size of the population (or subpopulation) at this location.

<sup>&</sup>lt;sup>d</sup> The *minimum* number of clumps reported for this site (EOR), regardless of year. Provided to give a coarse indication of the relative size of the population (or subpopulation) at this location.

<sup>&</sup>lt;sup>e</sup> The apparent trend in number of clumps, taking into account the chronology of observations reported to NCNHP. "Not available" = trends not available from current data; "D" = decreasing"; "I" = Increasing. Question marks indicate significant uncertainty as to whether available data should be taken at face value.