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Executive Director

October 24, 2019

Tierra Curry  
Senior Scientist  
Center for Biological Diversity  
PO Box 11374  
Portland, OR 97211  
tcurry@biologicaldiversity.org

Dear Ms. Tierra Curry,

Following the petitioning of Shinner's sunflower (*Helianthus occidentalis* ssp. *plantagineus*) in 2010, staff at Texas Parks and Wildlife Department (TPWD) completed population surveys in Texas as part of our state-wide status assessment for this species. As a result of our findings, we prepared a summary of our assessment for your review. We recommend that the petition to list Shinner's sunflower be struck for the following reasons:

1. When this species was petitioned for listing in 2010, little work had been conducted on this species by the Texas natural heritage program (TPWD). At that time 10-15 collections were reported in Texas. However, a report in 2015 conducted on the petitioned species in Texas located 31 extant and 18 historic occurrences from herbarium specimens and other grey literature.
2. Rights-of-way surveys from 2016 to 2018 relocated seven previously known sites and six new sites increasing the total number of extant and historic sites to 55. Population estimates from the 2017 surveys indicated 16,400 to 45,500 rosettes from only ten of the extant sites.
3. After these surveys, the species conservation status rank was reviewed in Texas and changed from a S2S3 to an S4. This subsequently will change the T rank of the subspecies across its entire range, although coordination among Texas, Arkansas and Louisiana has not occurred to finalize the T rank. However, both Arkansas and Louisiana are aware of the request to strike this species from the petition.
4. Although most of the known extant populations in Texas are on highway rights-of-way, this species is a prairie species with tolerance to regular mowing regimes along these managed strips and seems to do well with this management approach.

Please see the attached report for more detailed information supporting the above reasons provided for striking this species from the petition.

TPWD appreciates the opportunity to comment on this species. Please contact Anna Strong at (512) 389-4767 or [anna.strong@tpwd.texas.gov](mailto:anna.strong@tpwd.texas.gov) if you have any questions related to the information provided in this review.

Ms. Tierra Curry  
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Sincerely,

A handwritten signature in black ink, appearing to read "Anna Strong". The signature is written in a cursive, flowing style with a large initial "A" and "S".

Anna Strong  
Botanist