

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

California Endangered Species Act



Petition Evaluation for Gerry's Curly-Leaved Monardella (*Monardella sinuata* subsp. *gerryi*)

Report to the Fish and Game Commission
June 2025



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LIST OF ABBREVIATIONS, ACRONYMS, AND TERMS

CEQA – California Environmental Quality Act

CESA – California Endangered Species Act

CNDDDB – California Natural Diversity Database

CNPS – California Native Plant Society

Commission – California Fish and Game Commission

Department – California Department of Fish and Wildlife

et al. – “and others”

subsp. – subspecies

EXECUTIVE SUMMARY

This petition evaluation for Gerry's curly-leaved monardella (*Monardella sinuata* subsp. *gerryi*) has been prepared by the California Department of Fish and Wildlife (Department) in response to the petition to list Gerry's curly-leaved monardella as endangered under the California Endangered Species Act (CESA). The purpose of this petition evaluation is to provide a recommendation to the Fish and Game Commission (Commission) on whether the petition provides sufficient information to indicate the petitioned action may be warranted.

Gerry's curly-leaved monardella is an erect, annual herb in the mint family (Lamiaceae). The petition describes Gerry's curly-leaved monardella as being known from three occurrences in the Camarillo and Las Posas hills in Ventura County and restricted to Las Posas Sand soil. The petition provides an abundance estimate of fewer than 500 individuals of Gerry's curly-leaved monardella and provides information to suggest a declining population trend. The petition lists several threats to Gerry's curly-leaved monardella including development, land clearing and grading, vegetation succession, agriculture, construction and maintenance of roads and trails, and erosion. The most significant and immediate threat, as mentioned in the petition, is a proposed development that could impact the largest occurrence of the species. Existing management efforts were reviewed and suggestions for future management actions discussed in the petition. Information sources and a detailed distribution map were also provided in the petition.

The Department has determined that the petition addresses each of the required petition components listed in Fish and Game Code section 2072.3 and California Code of Regulations, title 14, section 670.1, subdivision (d)(1):

- Life history
- Range
- Distribution
- Detailed distribution map
- Kind of habitat necessary for survival
- Abundance
- Population trend
- Factors affecting the ability to survive and reproduce
- Degree and immediacy of threat
- Impact of existing management efforts
- Suggestions for future management
- Availability and sources of information

In completing its petition evaluation, the Department considered the information in the petition and other relevant information the Department possesses. The Department has determined that there is sufficient scientific information to indicate that the petitioned action to list Gerry's curly-leaved monardella as endangered under CESA may be warranted. Therefore, the Department recommends that the Commission accept the petition for further consideration pursuant to CESA.

1 INTRODUCTION

1.1 Petition Evaluation Overview

This petition evaluation serves as the basis for the California Department of Fish and Wildlife's (Department) recommendation to the California Fish and Game Commission (Commission) on whether the petition to list Gerry's curly-leaved monardella (*Monardella sinuata* Elvin & A. C. Sanders subsp. *gerryi* Elvin, A.C. Sanders & R.A. Burgess) as endangered under the California Endangered Species Act (CESA) should be accepted and considered. The recommendation is based on the sufficiency of scientific information in the petition, as well as other relevant information possessed or received by the Department during the evaluation period.

A petition to list a species under CESA must include "information regarding the population trend, range, distribution, abundance, and life history of a species, the factors affecting the ability of the population to survive and reproduce, the degree and immediacy of the threat, the impact of existing management efforts, suggestions for future management, and the availability and sources of information. The petition shall also include information regarding the kind of habitat necessary for species survival, a detailed distribution map, and any other factors that the petitioner deems relevant" (Fish & G. Code, § 2072.3; Cal. Code Regs., tit. 14, § 670.1, subd. (d)(1)).

Once a petition is submitted to the Commission, the Department has 90 days (120 days with extension) to prepare a petition evaluation that evaluates each of the petition components and makes a recommendation to the Commission as to whether there is sufficient scientific information to indicate that the petitioned action to list the species under CESA may be warranted (Fish & G. Code, § 2073.5, subs. (a)-(b)). Once completed by the Department, the petition evaluation is delivered to the Commission and placed on the agenda for receipt at the next available meeting of the Commission. At that time, the petition evaluation will be made available to the public for a 30-day public comment period prior to the Commission taking any action on the petition. The Commission then considers the petition, the Department's petition evaluation, written comments received, and oral testimony to make a finding at the next available meeting of the Commission as to whether the petition provides "sufficient information to indicate that the petitioned action may be warranted" (Fish & G. Code, § 2074.2, subd. (e)(2)). The standard for accepting a petition for consideration and assessing sufficiency of information is addressed in *Center for Biological Diversity v. California Fish and Game Commission* (2008) 166 Cal.App.4th 597.

If the Commission determines that the petitioned action may be warranted, it accepts the petition, and the species becomes a candidate for CESA listing and proceeds to the status review stage of the CESA listing process. The Department then prepares a peer-

reviewed report that advises the Commission on whether the petitioned action is warranted, based upon the best scientific information available (Fish & G. Code, § 2074.6). Finally, the Commission determines whether the petitioned action to list the species as threatened or endangered is warranted, based on the Department's status review and other relevant information in the administrative record (Fish & G. Code, § 2075.5).

1.2 CESA Petition History

On February 19, 2025, the California Native Plant Society (CNPS) submitted a petition to the Commission to list Gerry's curly-leaved monardella as endangered under CESA. On February 28, 2025, the Commission referred the petition to the Department for evaluation. At its meeting on April 16-17, 2025, the Commission officially acknowledged receipt of the petition. At its meeting on June 11-12, 2025, the Commission granted the Department's request for a 30-day extension of the period to review the petition and prepare this petition evaluation.

1.3 Federal Endangered Species Act Petition History

Gerry's curly-leaved monardella has no federal status under the federal Endangered Species Act.

1.4 Additional Species Status Designations

1.4.1 NatureServe Conservation Status Ranks

NatureServe's conservation status ranks are a way to assess the conservation status of species across geographic scales using standard methods. These conservation status ranks are typically assigned by natural heritage programs. There is a nationwide network of natural heritage programs, with more than 80 programs throughout the western hemisphere, overseen by an organization called NatureServe (CNDDB 2020). The California Natural Diversity Database (CNDDB) is California's natural heritage program.

All natural heritage programs use the same ranking methodology originally developed by The Nature Conservancy, and subsequently revised and maintained by NatureServe, to assign conservation status ranks (Master et al. 2012). For subspecies and varieties, these conservation status ranks consist of three components: 1) a global conservation status rank (global rank, G rank) describing the status of a given species over its entire distribution; 2) a trinomial conservation status rank (trinomial rank, T rank) describing the status of a given subspecies or variety over its entire distribution; and 3) a subnational conservation status rank (subnational rank, S rank) describing the status of

a given subspecies or variety over its state distribution (Master et al. 2012). Global, trinomial, and subnational ranks are calculated using NatureServe’s rank calculator which uses a combination of rarity, threats, and trends to assign a conservation status rank for the taxon in question (Master et al. 2012). The CNDDDB has assigned Gerry’s curly-leaved monardella a global rank of G3, a trinomial rank of T1, and a subnational rank of S1, indicating that the full species, *Monardella sinuata*, is vulnerable globally, whereas the subspecies *gerryi* is critically imperiled both globally and within California due to one or more of the following: very high risk of extinction due to a very restricted range, very few populations or occurrences, very steep declines, severe threats, or other factors (CNDDDB 2020, 2025).

1.4.2 California Rare Plant Rank

CNPS works in collaboration with botanical experts throughout the state, including Department biologists, to assign rare plants a California Rare Plant Rank reflective of their rarity status (CNDDDB and CNPS 2020). Gerry’s curly-leaved monardella has been assigned a California Rare Plant Rank of 1B.1 (CNPS 2025). Plants with a California Rare Plant Rank of 1B are considered rare, threatened, or endangered throughout their range with the majority endemic to California (CNDDDB and CNPS 2020). The threat code extension of “.1” indicates that the species is seriously threatened in California with over 80% of occurrences threatened and a high degree and immediacy of threat (CNDDDB and CNPS 2020).

2 SPECIES DESCRIPTION AND TAXONOMY

CESA defines the “species” eligible for listing to include “species or subspecies” (Fish & G. Code, §§ 2062, 2067, 2068) and courts have held that the term “species or subspecies” includes “evolutionarily significant units” (Central Coast Forest Assn. v. Fish & Game Com. (2018) 18 Cal.App.5th 1191, 1236, citing Cal. Forestry Assn., *infra*, 156 Cal.App.4th at pp. 1542, 1549). Gerry’s curly-leaved monardella is a subspecies of *Monardella sinuata*; however, for convenience, the term “species” is used herein to refer to Gerry’s curly-leaved monardella.

2.1 Species Description

The information in this section covers the main characters used to identify Gerry’s curly-leaved monardella and is based on the original description of the species from Elvin et al. 2015 unless otherwise noted; additional information is available in Elvin et al. (2015).

Gerry’s curly-leaved monardella is an erect, annual herb in the mint family (Lamiaceae). Gerry’s curly-leaved monardella typically grows between 7 and 30 cm (2.7 and 11.8 in) tall but can get as tall as 43 cm (16.9 in). The plant is simple to moderately branched.

Stems are straw-colored to tan with sparse cone-shaped glands. Leaf blades are narrowly elliptic measuring greater than 10 mm (0.39 in) in length and 2 to 6 mm (0.08 to 0.24 in) in width. The leaf margins are generally wavy.

Gerry's curly-leaved monardella flowers are purple and 11 to 14 mm (0.43 to 0.55 in) long. The flowers are weakly bilateral with an upper petal lip that is erect and 2-lobed and a lower petal lip that is recurved and 3-lobed (Sanders et al. 2012). In Gerry's curly-leaved monardella, the calyx (outermost group of flower parts) is 5.5 to 6 mm (0.22 to 0.24 in) long and has glandular trichomes (hair-like growths) that are 0.02 to 0.04 mm long. Flowers are arranged in a tightly condensed, head-like cluster called an inflorescence with one to seven inflorescences per plant. Inflorescences are 7 to 17 mm (0.28 to 0.67 in) wide, with those on the main stem larger than those on the axillary stems. Gerry's curly-leaved monardella produces dry fruits called nutlets that are 1.5 to 1.6 mm (0.06 in) long.

2.2 Species Taxonomy

Gerry's curly-leaved monardella was first described by Mark Elvin, Andrew Sanders, Richard Burgess, and Barbara Hellenthal in 2015 (Elvin et al. 2015). Prior to its recognition as a distinct subspecies, Gerry's curly-leaved monardella was considered a disjunct population of southern curly-leaved monardella (*M. sinuata* subsp. *sinuata*) (Elvin et al. 2015). Southern curly-leaved monardella occurs from Morro Bay in San Luis Obispo County south to the Purisima Hills in Santa Barbara County, but the plants now described as Gerry's curly-leaved monardella are from Ventura County, greater than 125 km (78 mi) south of other southern curly-leaved monardella populations (Elvin et al. 2015). Gerry's curly-leaved monardella is not currently included in the Jepson eFlora because the species was described in 2015 after the Jepson eFlora treatment for the mint family (which includes the genus *Monardella*) was published (Sanders et al. 2012, Elvin et al. 2015).

When initially described in 2015, Elvin et al. considered describing Gerry's curly-leaved monardella as a full species due to its geographic isolation and distinct morphological characters but decided to classify it as a subspecies based on similarities to *M. sinuata* (Elvin et al. 2015). The petition states that recent phylogenetic analyses support elevating Gerry's curly-leaved monardella to a full species, and that these findings are anticipated to be published in the future. Whether Gerry's curly-leaved monardella is recognized as a full species or a subspecies, the entity proposed for listing in the petition is the same and elevating it to a full species would not affect its rarity status.

2.3 Similar Taxa

Gerry's curly-leaved monardella is similar to southern curly-leaved monardella and northern curly-leaved monardella (*M. sinuata* subsp. *nigrescens*), but there are stem, leaf, flower, and fruit characteristics that distinguish Gerry's curly-leaved monardella from the other two subspecies as shown in Table 1. The petition mentions that the only other annual *Monardella* species from Ventura County is Brewer's monardella (*Monardella breweri*) which has leaf margins that are slightly wavy or not wavy, compared to Gerry's curly-leaved monardella which has wavy leaf margins. Brewer's monardella has not been documented to co-occur with Gerry's curly-leaved monardella.

Table 1. Key traits to distinguish between Monardella sinuata subspecies (Elvin et al. 2015).

	Gerry's curly-leaved monardella	Southern curly-leaved monardella	Northern curly-leaved monardella
Subspecies	subsp. <i>gerryi</i>	subsp. <i>sinuata</i>	subsp. <i>nigrescens</i>
Leaf width (mm)	2–6	4–10 (occasionally 3)	4–10
Leaf length to width ratio	5–7:1	3–6:1	3–6:1
Calyx length (mm)	5.5–6	7–8	7–9
Calyx trichomes (mm)	0.02–0.04, glandular	None	0.6–1.2, non-glandular
Corolla length (mm)	11–14	13–16	14–16
Stem glands	Present	Absent	Absent
Fruit length (mm)	1.6	1.1	1.1
County distribution	Ventura	San Luis Obispo, Santa Barbara	Monterey

3 SUMMARY OF PETITION COMPONENTS

Pursuant to Fish and Game Code section 2072.3 and California Code of Regulations, title 14, section 670.1, subdivision (d)(1), the Department evaluated whether the petition contained information on each of the following petition components:

- Life history;
- Range;
- Distribution;
- Detailed distribution map;
- Kind of habitat necessary for survival;
- Abundance;
- Population trend;
- Factors affecting the ability to survive and reproduce;
- Degree and immediacy of threat;
- Impact of existing management efforts;
- Suggestions for future management; and
- Availability and sources of information.

The Commission did not receive new information from the public during the petition evaluation period (Fish & G. Code, § 2073.4). Pursuant to Fish and Game Code section 2073.5, the Department evaluated the petition to determine whether there is, or is not, sufficient information to indicate that the petitioned action may be warranted. A summary of the relevant information from the petition for each of the petition components is presented below. In some instances, the Department has grouped similar components together and renamed components to create a more cohesive and readable document.

3.1 Life History

This section summarizes the information in the petition regarding the species' life history (Fish & G. Code, § 2072.3; Cal. Code Regs., tit. 14, § 670.1, subd. (d)(1)).

The petition discusses the life history of Gerry's curly-leaved monardella in the "Reproduction and Growth" section on pages 9 and 10. The petition notes that Gerry's curly-leaved monardella has been observed blooming from April through June; however, there have been no studies on pollination, reproduction, or seed dispersal specific to the species. The petition mentions studies and observations of other *Monardella* species. Pollinators mentioned in the petition for other *Monardella* species include hummingbirds, bees, butterflies, and flies. A seedbank study for a different

species of *Monardella*, mentioned in the petition, found that most seedlings germinate close to the parent plant and no specialized dispersal mechanisms were found.

3.2 Range and Distribution

This section summarizes the information in the petition regarding the species' range and distribution and provides a detailed distribution map (Fish & G. Code, § 2072.3; Cal. Code Regs., tit. 14, § 670.1, subd. (d)(1)). A species' range for the purposes of CESA and this petition evaluation is the species' range within California (Cal. Forestry Assn. v. Cal. Fish and Game Com. (2007) 156 Cal.App.4th 1535, 1551). Range describes the general geographical area in which a species occurs. Distribution describes the actual sites where individuals and populations of the species occur within the species' range.

The petition discusses the range and distribution of Gerry's curly-leaved monardella in the "Distribution" section on pages 11 through 19. The petition also provides detailed distribution maps for Gerry's curly-leaved monardella as Figures 3 through 6 on pages 12 through 14. Figure 3 of the petition is included as Figure 1 on page 8 of this petition evaluation. The petition describes Gerry's curly-leaved monardella as being endemic to the Camarillo and Las Posas hills of Ventura County, California. There are three occurrences of Gerry's curly-leaved monardella documented in the CNDDDB and described in the petition. One of the occurrences (CNDDDB occurrence 1) is based on a 1976 herbarium collection from the Santa Rosa Valley and is presumed extirpated by development. The remaining two occurrences are presumed extant, with one occurrence located in the Camarillo Hills (CNDDDB occurrence 2) and the other occurrence located in the Las Posas Hills (CNDDDB occurrence 3). The petition reports that based on site visits in 2024, the area occupied by Gerry's curly-leaved monardella is approximately 540 m² (0.13 ac). The petition also mentions that there is some potential to find additional occurrences of Gerry's curly-leaved monardella but much of the appropriate habitat in the Camarillo and Las Posas hills has been developed or converted to agriculture and the undeveloped areas may not have suitable microhabitat or climatic conditions.

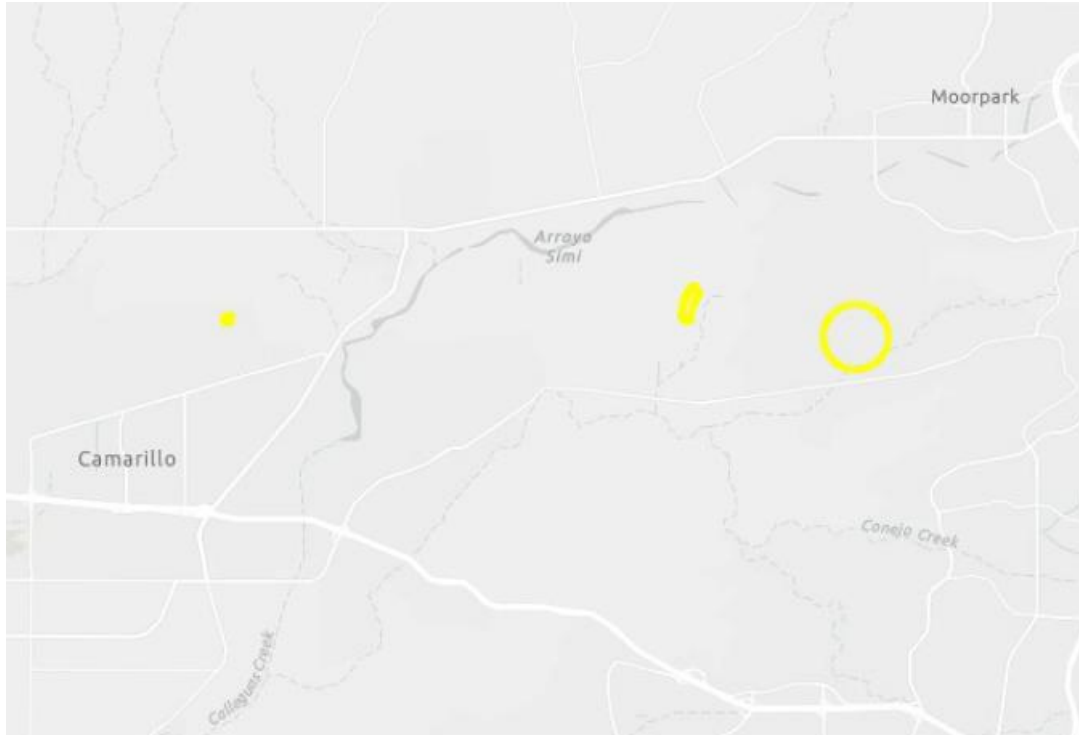


Figure 1. Map of the range and distribution of Gerry's curly-leaved monardella as provided in Figure 3 of the petition. Yellow polygons are 2024 CNDDDB occurrences (left to right; occurrences 2, 3, and 1).

3.3 Habitat

This section summarizes the information in the petition regarding the kind of habitat necessary for species survival (Fish & G. Code, § 2072.3; Cal. Code Regs., tit. 14, § 670.1, subd. (d)(1)).

The petition discusses the kind of habitat necessary for Gerry's curly-leaved monardella survival in the "Habitat" section on page 10. The petition describes Gerry's curly-leaved monardella as being restricted to soils derived from Las Posas Sand at elevations from 150 to 245 m (490 to 805 ft) above sea level. The petition states that Gerry's curly-leaved monardella occurs in sandy openings within coastal sage scrub and provides a list of plant associates.

3.4 Abundance and Population Trend

This section summarizes the information in the petition regarding the species' abundance and population trend (Fish & G. Code, § 2072.3; Cal. Code Regs., tit. 14, § 670.1, subd. (d)(1)).

The petition discusses abundance and population trend for Gerry's curly-leaved monardella in the "Abundance and Population Trends" section on pages 19 and 20. The petition states that Gerry's curly-leaved monardella is known from three CNDDDB occurrences. One occurrence (CNDDDB occurrence 1) is presumed extirpated while the remaining two occurrences are extant. The petition reports that in 2024, there were 350 to 400 plants at one of the extant occurrences (CNDDDB occurrence 2) and 21 plants at the other extant occurrence (CNDDDB occurrence 3). The petition states that Gerry's curly-leaved monardella is likely experiencing a declining population trend based on loss of habitat in the area from agriculture and development. In addition, the petition notes that one of the extant occurrences (CNDDDB occurrence 3) appears to be declining with 50 to 100 plants reported in 2013, but just 21 plants reported in 2024.

3.5 Threats

This section summarizes the information in the petition regarding the factors affecting the ability of the species to survive and reproduce, and the degree and immediacy of threats (Fish & G. Code, § 2072.3; Cal. Code Regs., tit. 14, § 670.1, subd. (d)(1)).

The petition discusses threats affecting the ability of Gerry's curly-leaved monardella to survive and reproduce in the "Factors Impacting Survival and Reproduction" section on pages 19 and 20 and discusses the degree and immediacy of threat for Gerry's curly-leaved monardella in the "Degree and Immediacy of Threat" section on page 20. The petition identifies the following factors as threats to Gerry's curly-leaved monardella: proposed development, land clearing and grading, vegetation succession, agriculture, construction and maintenance of roads and trails, and erosion. The petition notes that both extant occurrences of Gerry's curly-leaved monardella are on privately-owned land with the most immediate threat being a proposed development project that could impact the largest occurrence of the species.

The petition mentions that small, fragmented populations are at an increased risk of extinction. The petition states that fragmented populations may experience inbreeding depression and pollen limitation which may then lead to decreased germination rates, decreased genetic variability, and higher probability of extinction. The petition also discusses climate change as having the potential to increase the extinction risk for plants with small populations and these risks are exacerbated for soil specialist species, such as Gerry's curly-leaved monardella, which may be unable to migrate to new sites as the climate changes.

3.6 Existing Management

This section summarizes the information in the petition regarding the impact of existing management efforts on the species (Fish & G. Code, § 2072.3; Cal. Code Regs., tit. 14, § 670.1, subd. (d)(1)).

The petition discusses existing management for Gerry's curly-leaved monardella in the "Impact of Existing Management Efforts" section on pages 20 through 22. The petition states that there is currently no conservation management plan or conservation actions that have been taken to protect Gerry's curly-leaved monardella. While Gerry's curly-leaved monardella may be afforded some protection through the California Environmental Quality Act (CEQA), the petition notes that CEQA does not necessarily prevent rare plants from being severely impacted or extirpated from a project site. CEQA-approved mitigation measures can include moving a rare plant to another area; however, the petition cites a paper that reviews transplantation, relocation, or reintroduction attempts of rare plants and finds that only 8% of these attempts are successful. The petition mentions that Gerry's curly-leaved monardella needs the increased protection afforded by CESA to ensure the species does not go extinct.

3.7 Future Management

This section summarizes the information in the petition regarding suggestions for future management (Fish & G. Code, § 2072.3; Cal. Code Regs., tit. 14, § 670.1, subd. (d)(1)).

The petition discusses future management actions for Gerry's curly-leaved monardella in the "Suggestions for Future Management" section on pages 22 through 24. The petition recommends the following specific actions:

- Protect and manage both extant occurrences to ensure long-term survival and conservation of the species.
- Collect seed at both extant occurrences for potential future use in scientific research, reintroduction efforts, and/or other conservation actions.
- Survey all potentially suitable habitat for additional populations of the species.
- Conduct additional scientific research on the biology and ecology of the species to help inform conservation and management actions.
- Monitor population trends at existing occurrences and identify management actions that may be required to ensure long-term persistence and expansion of the species.
- Enhance existing populations if feasible and determine if new populations could be established at other suitable locations.
- Educate the public about conservation of the species.

3.8 Availability and Sources of Information

This section summarizes the information in the petition regarding availability and sources of information (Fish & G. Code, § 2072.3; Cal. Code Regs., tit. 14, § 670.1, subd. (d)(1)).

The petition provides a list of sources for Gerry's curly-leaved monardella in the "References" section on pages 25 through 29. The petitioner provided electronic copies of sources from the petition to the Commission.

4 OTHER RELEVANT INFORMATION AVAILABLE TO THE DEPARTMENT

Pursuant to Fish and Game Code section 2073.5, the Department also evaluates petitions in relation to other relevant information the Department possesses or receives.

The Department has not been able to locate any additional information in its possession on Gerry's curly-leaved monardella that was not already provided by the petitioner, and no additional information was received by the Department at the time this report was submitted to the Commission. If the Commission accepts the petition for consideration, all reasonable attempts will be made by the Department to notify affected and interested parties and to solicit data and comments on the petitioned action (Fish & G. Code, § 2074.4). At that time, the Department will commence a review of the status of the species and produce a written peer reviewed report, based upon the best scientific information available to the Department, which indicates whether the petitioned action is warranted (Fish & G. Code, § 2074.6).

5 SUFFICIENCY OF SCIENTIFIC INFORMATION AND RECOMMENDATION TO THE COMMISSION

The Department evaluated the petition components set forth in Fish and Game Code section 2072.3 and California Code of Regulations, title 14, section 670.1, subdivision (d)(1) for sufficiency of information pursuant to Fish and Game Code section 2073.5. Based upon the information contained in the petition and other relevant information, the Department determined there is sufficient information to indicate that the petitioned action may be warranted (Fish & G. Code, § 2073.5). Therefore, the Department recommends the Commission accept the petition for further consideration under CESA. If the Commission accepts the petition for further consideration, the Department will commence a review of the status of the species at that time pursuant to Fish and Game Code section 2074.6 and California Code of Regulations, title 14, section 670.1, subdivision (f).

ACKNOWLEDGEMENTS

This petition evaluation was prepared by Kristi Lazar in the Department's Habitat Conservation Planning Branch, Native Plant Program.

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