

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

California Endangered Species Act



Petition Evaluation for Ferris' Milk-Vetch (*Astragalus tener* var. *ferrisiae*)

Report to the Fish and Game Commission
June 2026

Suggested citation: California Department of Fish and Wildlife (CDFW). 2026. Petition evaluation for Ferris' milk-vetch (*Astragalus tener* var. *ferrisiae*). A report to the Fish and Game Commission, California Natural Resources Agency, Sacramento, CA, USA.

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LIST OF ABBREVIATIONS, ACRONYMS, AND TERMS

CESA – California Endangered Species Act
 CNDDB – California Natural Diversity Database
 CNPS – California Native Plant Society
 Commission – California Fish and Game Commission
 CRPR – California Rare Plant Rank
 Department – California Department of Fish and Wildlife
 var. – variety

EXECUTIVE SUMMARY

This petition evaluation for Ferris' milk-vetch (*Astragalus tener* var. *ferrisiae*) has been prepared by the California Department of Fish and Wildlife (Department) in response to the petition to list Ferris' milk-vetch 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.

Ferris' milk-vetch is an annual plant in the legume family (Fabaceae) that blooms in April and May. The petition describes Ferris' milk-vetch as being known from 18 occurrences in the northern and central Sacramento Valley and occurring in valley and foothill grassland on clay-rich, often subalkaline soils. The petition provides an abundance estimate for eight occurrences with population sizes ranging from two to more than 2,000 plants and provides information to suggest a declining population trend. The petition lists several threats to Ferris' milk-vetch including agricultural and developed land uses, climate change, and invasive species. The petition mentions that extirpation from much of its range or extinction of the species may occur because: almost all occurrences are threatened and the severity of some threats is increasing, the species has been documented at only a small number of sites that are also small in area, and most sites occupied by the species are unprotected and not managed for the conservation of the species. Existing management efforts were reviewed and suggestions for future management actions were discussed in the petition. Information sources and a distribution map were also provided in the petition.

The Department has determined that the petition does not sufficiently address 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 not sufficient scientific information to indicate that the petitioned action to list Ferris' milk-vetch as endangered under CESA may be warranted. Therefore, the Department recommends that the Commission reject 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 Ferris' milk-vetch (*Astragalus tener* var. *ferrisiae*) 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 that was reviewed 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 assesses 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, subds. (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 and recommendation, written comments received, and oral testimony, and will then 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, 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 information in the administrative record (Fish & G. Code, § 2075.5).

1.2 CESA Petition History

On August 29, 2025, Dr. John C. Hunter submitted a petition to the Commission to list Ferris' milk-vetch as endangered under CESA. On September 8, 2025, the Commission referred the petition to the Department for evaluation. At its meeting on October 8, 2025, the Commission officially acknowledged receipt of the petition. At its meeting on December 10, 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 Status

Ferris' milk-vetch has no status under the Federal Endangered Species Act (16 U.S.C. § 1531 et seq.). In 1993, the U.S. Fish and Wildlife Service provided notice that it was possibly appropriate to propose listing Ferris' milk-vetch as endangered or threatened, but sufficient data was not then available to support a listing proposal (58 Fed.Reg. 51144 (Sep. 30, 1993)).

1.4 Additional Species Status Designations

1.4.1 NatureServe Conservation Status Ranks

NatureServe's 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). NatureServe has assigned Ferris' milk-vetch a global rank of G2, a trinomial rank of T1, and a subnational rank of S1, indicating that the full species is imperiled globally and the variety is critically imperiled both globally and within California with a very high risk of extinction due to one or more of the following: very restricted range, very few populations or occurrences, very steep declines, very severe threats, or other factors (CNDDDB 2020, 2025).

1.4.2 California Rare Plant Rank

The California Native Plant Society (CNPS) works in collaboration with botanical experts throughout the state, including Department biologists, to assign rare plants a California Rare Plant Rank (CRPR) reflective of their rarity status (CNDDDB and CNPS 2020). CNPS has assigned Ferris' milk-vetch a CRPR of 1B.1 (CNPS 2025). Plants with a CRPR 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

Ferris' milk-vetch is a member of the legume family (Fabaceae). It is a delicate annual with erect or ascending stems that are 6 to 26 cm (2.4 to 10.2 in) long (Welsh 2023; Wojciechowski and Spellenberg 2023). Leaves are 2 to 6 cm (0.8 to 2.4 in) long and are made up of a series of 7 to 15 leaflets (Welsh 2023; Wojciechowski and Spellenberg 2023). Ferris' milk-vetch flowers are pea-like with a large upper petal (called a banner) and two lower fused petals (called a keel) (Jepson Flora Project 2026). Ferris' milk-vetch flowers are pink to purple with a recurved banner that is 7.8 to 9.6 mm (0.31 to 0.38 in) long with a white spot and a keel that is 4.2 to 5.1 mm (0.17 to 0.2 in) long (Liston 1990; Wojciechowski and Spellenberg 2023). Each inflorescence (groupings of flowers) is composed of 3 to 12 flowers (Welsh 2023; Wojciechowski and Spellenberg 2023). Ferris' milk-vetch fruits are curved inward, 2.7 to 5 mm (0.11 to 0.2 in) long, and are on a base or stalk that is 3 to 5 mm (0.12 to 0.2 in) long (Liston 1990; Welsh 2023). The fruiting stems of Ferris' milk-vetch are deflexed (curved downward) (Liston 1990). Ferris' milk-vetch has 10 to 16 seeds that have a smooth seed coat (Liston 1990).

Ferris' milk-vetch was first collected as Rattan's milk-vetch (*Astragalus rattanii*) by Katharine Brandegee in 1884 (CCH 2026). In 1958, Rupert Barneby described Jepson's milk-vetch (*A. rattanii* var. *jepsonianus*) and in 1964, he expanded the circumscription of that variety to include plants that were subsequently described as Ferris' milk-vetch (Liston 1990). In 1990, Aaron Liston described Ferris' milk-vetch as a new variety of *A. tener* (*A. tener* var. *ferrisiae*) based on its smooth seeds, deflexed pedicels, and white-spotted banner (Liston 1990). The currently accepted name for Ferris' milk-vetch is *Astragalus tener* var. *ferrisiae* (Wojciechowski and Spellenberg 2023).

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
- Availability and sources of information

The Department 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. For each petition component, the Department has also presented an assessment of the information provided in the petition and a summary of any relevant information in the Department's possession. Overall sufficiency of the petition is determined by looking at the information in the petition as a whole and is further discussed in the "Sufficiency of Scientific Information and Recommendation to the Commission" section of this petition evaluation. The Department has grouped similar petition 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)). Section E on pages 6 and 7 of the petition provides information on the life history of Ferris' milk-vetch.

The petition provides a physical description of Ferris' milk-vetch, with descriptions of its habit, stems, leaves, flowers, fruits, and seeds. The petition contrasts Ferris' milk-vetch with the physical properties of the two other varieties of *A. tener*, alkali milk-vetch (*A. tener* var. *tener*) and coastal dunes milk-vetch (*A. tener* var. *titi*). The petition describes Ferris' milk-vetch as an annual plant that blooms in April and May and is pollinated by insects. The petition also states that the species' seed dispersal, dormancy and germination, growth, and demography have not been studied but seeds of other *Astragalus* species can remain viable for several years and germinate following scarification.

3.1.1 Department Assessment

The Department considers the information provided in the petition on the life history of Ferris' milk-vetch to be adequate for assessing this petition component.

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. Section B on page 4 of the petition provides information on the range of Ferris' milk-vetch. Section C on pages 4 and 5 of the petition provides information on its distribution. Section L, Figure 2 on page 23 of the petition provides a distribution map, which has been provided as Figure 1 of this petition evaluation.

The petition describes Ferris' milk-vetch as a California endemic of the northern and central Sacramento Valley. The petition states that Ferris' milk-vetch's range comprises approximately 5,797 square kilometers (2,238 square miles), and that it occurs in Butte, Colusa, Glenn, Solano, Sutter, Yolo, and Yuba counties at elevations of 2 to 75 meters (5 to 245 feet). The petition states that Ferris' milk-vetch is known from 18 sites that were documented between 1884 and 2002. Eleven occurrences are noted in the petition as being nonspecific occurrences in which the precise location and boundaries of the species have not been documented. The petition describes Ferris' milk-vetch as being concentrated in three portions of its range, with occurrences from the northwestern portion of its range likely extirpated. The petition also mentions that Ferris' milk-vetch may occupy some additional, undocumented sites.

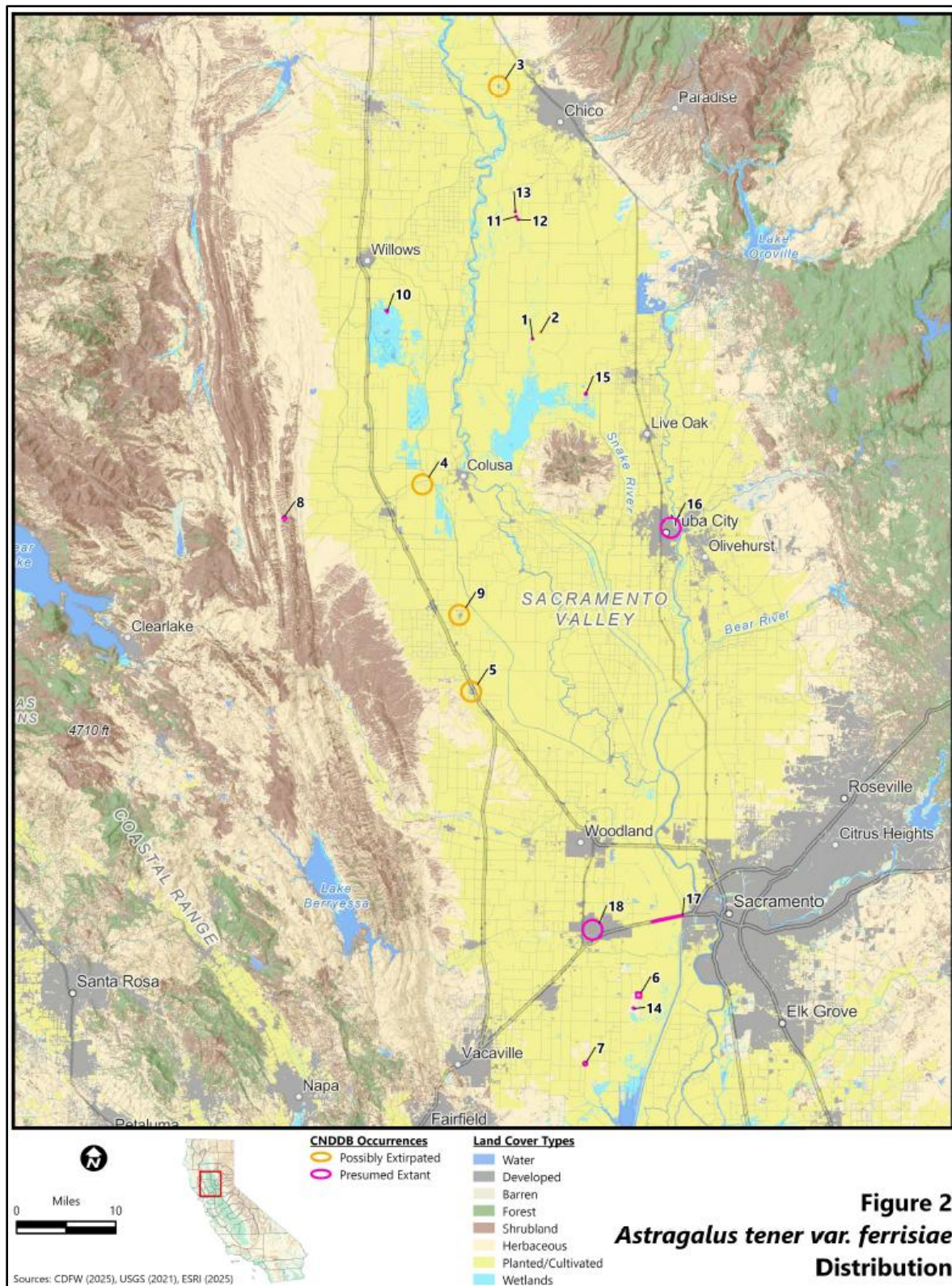


Figure 1. Map of the range and distribution of Ferris' milk-vetch as provided in Figure 2 of the petition. Occurrences from the California Natural Diversity Database (CNDDDB) are labeled with CNDDDB occurrence numbers. Some occurrences consist of multiple polygons.

3.2.1 Department Assessment

Range and distribution of Ferris' milk-vetch are presented in the petition based primarily on data from the California Natural Diversity Database (CNDDDB); however, no discussion is provided on the completeness of the information presented including whether the CNDDDB data represents the complete range and distribution of the species, whether additional information on range and distribution is available for the species that is not reflected in the CNDDDB data, or whether any survey efforts have been made to confirm or ascertain the full range and distribution of the species. Without further discussion explaining why the information provided in the petition is a scientifically defensible assessment of the range and distribution of the species, the Department is unable to properly determine whether the petition provides a reasonable explanation of the range and distribution of the species, or whether other petition components that rely on knowing the range and distribution of the species have been properly assessed.

The Department has some additional, readily available information from the CNDDDB not presented in the petition. The CNDDDB has an unprocessed online field survey form for the species which appears to be an update to an existing occurrence. While this additional, readily available information contributes to our current knowledge of the range and distribution of Ferris' milk-vetch, this information does not compensate for deficiencies in data in the petition for these topics. The information presented in the petition, considered alongside readily available information from the Department, is not adequate for assessing the range and distribution of Ferris' milk-vetch.

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)). Section F on page 7 of the petition provides information on the kind of habitat necessary for Ferris' milk-vetch survival.

The petition states that Ferris' milk-vetch occurs in valley and foothill grassland on clay-rich, often subalkaline soils, and has also been reported from sites with seasonal inundation, including freshwater marshes, vernal pools, and fallow rice fields. The petition also includes a list of several plant species that grow with Ferris' milk-vetch.

3.3.1 Department Assessment

The Department considers the information provided in the petition on the kind of habitat necessary for Ferris' milk-vetch survival to be adequate for assessing this petition component.

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)). Section D on pages 5 and 6 of the petition provides information on the abundance of Ferris' milk-vetch. Section A on pages 3 and 4 of the petition provides information on the population trend of Ferris' milk-vetch.

The petition summarizes information on the abundance of Ferris' milk-vetch at eight CNDDDB occurrences with population sizes ranging from two to more than 2,000 plants at each occurrence. The petition mentions that seven CNDDDB occurrences have been revisited with Ferris' milk-vetch not observed during revisits to six of the seven occurrences. The petition states that recent, range-wide, multi-year monitoring of Ferris' milk-vetch has not been conducted and, thus, a rigorous estimate of the total number of plants cannot be made. The petition estimates the area of occupied habitat to be less than 31 hectares (77 acres) based on CNDDDB polygon data.

The petition states that, based on information from the CNDDDB and land cover mapping from the U.S. Geological Survey, Ferris' milk-vetch has had a decreasing population trend because of loss and degradation of occupied habitat at 16 or more of the 18 sites where the species has been observed. The petition lists 12 occurrences that are either possibly extirpated, have not been observed during recent site visits, or have a poor population viability in the CNDDDB and reports 12 occurrences that are either likely extirpated or likely experiencing degradation or loss of habitat based on land cover mapping. The petition states that the species may have had additional, undocumented reductions in its populations that occurred before the distribution of Ferris' milk-vetch was well documented.

3.4.1 Department Assessment

Abundance of Ferris' milk-vetch is provided in the petition based on population estimates reported in the CNDDDB; however, no discussion is provided on the completeness of the information including whether there have been efforts to estimate population sizes at all occurrences, whether the population estimates are historical or recent, and whether the population estimates are based on complete or partial surveys of the occurrences. The petition also mentions that some CNDDDB occurrences have been revisited and Ferris' milk-vetch plants were not found, but no additional information was provided to give this information context, such as when the surveys took place, how thorough the surveys were, and why the plants were not found. Area of occupied habitat is estimated in the petition as an indicator of abundance using CNDDDB polygon data which the Department considers to be an inappropriate use of CNDDDB data. CNDDDB

polygons are typically mapped to include a buffer that represents the locational accuracy of the data and therefore should not be used to determine area occupied by the species.

Population trend of Ferris' milk-vetch is determined in the petition to be declining based on: 1) the number of CNDDDB occurrences that are designated as possibly extirpated, not observed during site revisits, or have a poor population viability, 2) the use of CNDDDB polygon data overlayed on land cover mapping to report the extent of any overlap between the CNDDDB polygon data with development or agriculture, and 3) the historical and ongoing changes to the Sacramento River's floodplains and floodbasins. No discussion is provided in the petition on the completeness of the information, including whether any recent efforts have been made to update information on the presence and condition of Ferris' milk-vetch occurrences, or whether population declines at some occurrences have resulted in a decline throughout the species' range. The petition uses CNDDDB polygon data overlayed on land cover mapping to report on the extent of overlap between CNDDDB polygons with development or agriculture to determine additional occurrences that may be experiencing a declining population trend. CNDDDB polygons are typically mapped to include a buffer that represents the locational accuracy of the data, and the petition does not indicate if development or agriculture shown on aerial imagery overlapped with the portion of the CNDDDB polygon that was previously occupied by the species or within areas that were once appropriate habitat for the species. In addition, the statements in the petition about changes to the Sacramento River's floodplains and floodbasins likely causing additional, undocumented habitat losses, population reductions, or both to Ferris' milk-vetch are too general and do not specifically identify impacts to habitat likely to have contained Ferris' milk-vetch.

The Department has some additional, readily available information from the CNDDDB not presented in the petition. The CNDDDB has an unprocessed online field survey form for the species which appears to be an update to an existing occurrence; this form also includes abundance information. While this additional, readily available information contributes to our current knowledge on the abundance of Ferris' milk-vetch, this information does not compensate for deficiencies in data for these topics. The information presented in the petition is not adequate for evaluating the abundance and population trend of Ferris' milk-vetch.

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)). Section G on pages 7 through 12 of the petition provides information on factors affecting the ability of Ferris' milk-vetch to survive and reproduce (threats). Section H on pages 12

through 14 of the petition provides information on the degree and immediacy of threats to Ferris' milk-vetch.

The petition lists several prominent range-wide threats to Ferris' milk-vetch: agricultural and developed land uses, climate change, and invasive species. The petition also mentions that grazing, surface water diversion, and incompatible management have been observed by botanists as additional threats affecting occurrences based on CNDDDB data.

The petition describes agricultural and developed land uses as major threats to Ferris' milk-vetch because these land uses have been directly eliminating, fragmenting, and increasing threats to the remaining habitat. The petition notes that according to the CNDDDB and the interpretation of land cover mapping in the petition showing agriculture and development in relation to CNDDDB occurrences of Ferris' milk-vetch, more than 80% of specifically mapped occurrences have experienced loss or degradation of habitat due to agriculture and development.

The petition states that climate change directly and indirectly threatens Ferris' milk-vetch by altering growing conditions, water availability, and frequency and intensity of disturbances. The petition also notes that climate change can alter interactions of the plant with pollinators, dispersers, fungal symbionts, seed predators, herbivores, and competitors. The petition states that the magnitude of climate change impacts on Ferris' milk-vetch is uncertain but may be substantial, particularly because of the species' limited range, rarity, habitat specificity, and distribution in relatively small and isolated areas that will be exposed to dramatic changes.

The petition states that invasive species have not been identified as a threat to Ferris' milk-vetch in the CNDDDB, but invasive species are likely a significant, range-wide threat to the species. The petition notes that several dozen invasive species are spreading in grasslands and seasonal wetlands in the species' range. The petition states that infestations of invasive species can directly affect the conditions or resources Ferris' milk-vetch relies on, thereby reducing abundance and making the species more vulnerable to extirpation from other causes.

The petition states that without additional management actions, there is a moderate to high likelihood that Ferris' milk-vetch will be extirpated from much of its range or become extinct. The petition mentions that this may occur because: almost all occurrences are threatened and the severity of some threats is increasing, the species has been documented at only a small number of sites that are also small in area, and most sites occupied by the species are unprotected and not managed for the conservation of the species.

3.5.1 Department Assessment

Factors affecting the ability of Ferris' milk-vetch to survive and reproduce, and the degree and immediacy of threats, are presented in the petition based primarily on threat data reported in the CNDDDB. Threats listed in the CNDDDB can be representative of various types of threat data, including current threats, future threats, past threats, threats affecting a small portion of the site, threats in one year but not another, etc. The petition also presents climate change and invasive species as threats to Ferris' milk-vetch although these are not listed in the CNDDDB. None of these threats are described in adequate detail in relation to Ferris' milk-vetch and the petition does not provide information on the degree and immediacy of these threats for the species.

The petition uses CNDDDB polygon data overlaid on land cover mapping to see if there is any overlap between the CNDDDB polygon data with development or agriculture to determine additional occurrences that may be experiencing threats. CNDDDB polygons are typically mapped to include a buffer that represents the locational accuracy of the data, and the petition does not indicate if development or agriculture shown on aerial imagery overlapped with the portion of the CNDDDB polygon that was previously occupied by the species or within areas that were once appropriate habitat for the species. Further discussion is needed on the use of aerial imagery to provide an accurate reflection of the degree of threat that development and agriculture are currently having on Ferris' milk-vetch.

The petition also mentions small number and size of occupied sites, and lack of protection and management, as additional reasons why Ferris' milk-vetch is likely to be extirpated from much of its range or become extinct. The petition has not shown that Ferris' milk-vetch distribution and number of sites have been fully assessed and has not accurately represented the size of the occupied sites. The petition also does not discuss what the unprotected lands with Ferris' milk-vetch are being used for and how that land use is threatening, or potentially threatening, the species.

The Department does not have additional, readily available information in its possession that compensates for deficiencies in data for these topics. The information presented in the petition is not adequate for assessing the factors affecting the ability of Ferris' milk-vetch to survive and reproduce, or the degree and immediacy of threats to Ferris' milk-vetch.

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)). Section I on pages 14 through 16 of the petition provides information on the impact of existing management efforts on Ferris' milk-vetch.

The petition states that management of Ferris' milk-vetch has been very limited, has not sufficiently addressed threats to the species, and consequently has not resulted in significant conservation of the species. The petition describes the impact of several management categories including legal protection, preservation and seed banking, management and monitoring, restoration, and surveys and research.

The petition describes Ferris' milk-vetch as having no legal protections but notes that the species has a CRPR of 1B.1 and should be treated as a special-status species during environmental review under the California Environmental Quality Act.

The petition states that 46% of presumed extant occurrences of Ferris' milk-vetch are on land managed for biodiversity. The petition mentions that seeds of Ferris' milk-vetch have not been collected and placed in long-term storage at a seed banking facility.

The petition notes that four occurrences of Ferris' milk-vetch experience management that is focused on wildlife, compatible recreation, and crop cultivation but management does include measures to avoid and minimize impacts to sensitive species and their habitats. The petition mentions that none of the Ferris' milk-vetch occurrences are the subject of systematic, formal monitoring.

The petition states that no efforts have been made to restore or create habitat occupied by Ferris' milk-vetch. The petition discusses how surveys have not been conducted to confirm the continued existence of Ferris' milk-vetch at all occurrences, surveys have not been conducted to more precisely map nonspecific occurrences of Ferris' milk-vetch, and range-wide surveys of potential habitat have not been conducted to search for additional, undocumented populations. The petition states that research has not been conducted on the species' genetic diversity, pollination, dispersal, establishment, growth, mortality, interactions with other species, population dynamics, habitat requirements, or other aspects of its ecology, and therefore understanding of the species' ecology is based primarily on observations by botanists and understanding of the ecology of related and similar species.

3.6.1 Department Assessment

The Department considers the information provided in the petition on impact of existing management efforts on Ferris' milk-vetch to be adequate for assessing this petition component.

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)). Section J on pages 16 and 17 of the petition provides suggestions for future management of Ferris' milk-vetch.

The petition provides a list of suggestions for future management including:

- list the species under CESA and prepare a recovery plan for it,
- include the species as a focal species in regional conservation investment strategies and as a covered species in natural community conservation plans,
- preserve occupied sites in perpetuity,
- collect seed and place it in long-term storage at a seed-banking facility,
- develop and implement site-specific monitoring and management plans,
- cease crop cultivation and implement compatible water management practices,
- manage extant populations to prevent the spread of invasive species and eradicate existing infestations,
- implement compatible grazing practices,
- coordinate and share information among organizations working to conserve the species,
- coordinate with and support private landowners implementing conservation practices in occupied habitat,
- restore degraded, occupied habitat,
- establish additional populations,
- conduct surveys to improve data on distribution and abundance,
- document genetic diversity, and
- investigate the species' reproductive biology and habitat requirements to inform conservation and management.

3.7.1 Department Assessment

The Department considers the information provided in the petition on suggestions for future management of Ferris' milk-vetch to be adequate for assessing this petition component.

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)). Section K on pages 17 through 22 of the petition provides the sources of

information used in the Ferris' milk-vetch petition. Digital copies of references cited were also provided to the Commission and Department.

3.8.1 Department Assessment

The Department received digital copies of references cited in the petition and considers this to be adequate to address the availability and sources of information mentioned in the petition for Ferris' milk-vetch.

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 evaluated readily available information relating to Ferris' milk-vetch that is available from the Department's document library and the CNDDDB, including data housed in the CNDDDB's unprocessed data layer. Regional Department staff were contacted to determine if additional information on the species was readily available and in the possession of Department staff. Any relevant information from these sources is mentioned within the "Department Assessment" section for each petition component.

To the extent the Department was able to review other relevant information in its possession as it relates to the petition, the Department concluded that none of the additional information compensates for data deficiencies in the petition. If the Commission accepts the petition for consideration, regardless of the Department's recommendation, 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 not sufficient information to indicate that the petitioned action may be warranted (Fish & G. Code § 2073.5).

In this petition evaluation, the Department has assessed the information in the petition for each petition component individually; however, sufficiency of the petition as a whole is ultimately determined by looking at all petition components taken together. The Department considers scientifically defensible information on range and distribution to be critical for determining sufficiency of the petition. For Ferris' milk-vetch, the Department has determined that sufficient information is lacking for the following petition components: range, distribution, abundance, population trend, factors affecting the ability of the species to survive and reproduce (threats), and the degree and immediacy of threats. Due to the lack of adequate information on these petition components, the Department does not consider the information in the petition to be sufficient as a whole for assessing whether listing Ferris' milk-vetch under CESA may be warranted and recommends the Commission reject the petition and not consider it further under CESA.

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