

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

California Endangered Species Act



Petition Evaluation for Rincon Ridge Ceanothus (*Ceanothus confusus*)

Report to the Fish and Game Commission
June 2026

Suggested citation: California Department of Fish and Wildlife (CDFW). 2026. Petition evaluation for Rincon Ridge ceanothus (*Ceanothus confusus*). 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
 CNDDDB – 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
 subsp. – subspecies
 var. – variety

EXECUTIVE SUMMARY

This petition evaluation for Rincon Ridge ceanothus (*Ceanothus confusus*) has been prepared by the California Department of Fish and Wildlife (Department) in response to the petition to list Rincon Ridge ceanothus as threatened 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.

Rincon Ridge ceanothus is an evergreen shrub in the buckthorn family (Rhamnaceae) that blooms February through June. The petition describes Rincon Ridge ceanothus as being known from 33 occurrences in the southern North Coast Ranges and occurring in chaparral and woodlands, often growing on substrates derived from serpentinite or volcanic rocks. The petition provides an abundance estimate for ten occurrences with population sizes ranging from 30 to more than 1,500 plants and provides information to suggest a declining population trend. The petition lists several threats to Rincon Ridge ceanothus including agricultural and developed land uses, disruptions to post-fire recovery, vegetation management to reduce fire risks, and climate change. The petition mentions that extirpation from much of its range or extinction of the species may occur because: most occurrences are threatened and the severity of some threats is increasing; the species has been documented at sites that are small in area, fragmented, or with few individuals; and many 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 Rincon Ridge ceanothus as threatened 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 Rincon Ridge ceanothus (*Ceanothus confusus*) as threatened 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 Rincon Ridge ceanothus as threatened 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

Rincon Ridge ceanothus 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 Rincon Ridge ceanothus 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 a global conservation status rank (global rank, G rank) describing the status of a given species over its entire distribution, and 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 Rincon Ridge ceanothus a global rank of G1 and a subnational rank of S1, indicating that the species 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 (CNDDB 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 Rincon Ridge ceanothus 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

2.1 Species Description

Rincon Ridge ceanothus is a member of the buckthorn family (Rhamnaceae). It is a mound-like, evergreen shrub that is 0.2 to 0.5 m (0.7 to 1.6 ft) tall (Burge and Wilken 2020). Stems are spreading to ascending and occasionally root at the nodes (Burge and Wilken 2020). Leaves are opposite with an appendage at the base of the leaf stem, called a stipule, that is knob-like (Burge and Wilken 2020). Leaf blades are 10 to 20 mm (0.4 to 0.8 in) long, 5 to 14 mm (0.2 to 0.6 in) wide, and elliptic to narrowly obovate (egg-shaped with the narrower end at the base) (Burge and Wilken 2020; Jepson Flora Project 2026). Leaf margins have 3 to 9 sharp teeth along the distal 2/3 of the leaf (Burge and Wilken 2020). Rincon Ridge ceanothus has blue to purple flowers with 5 sepals (outermost whorl of flower parts) and 5 petals with petals having a hood-like blade (Burge and Wilken 2020). Flowers are arranged into clusters called inflorescences that are 1 to 2 cm (0.4 to 0.8 in) long (Burge and Wilken 2020). Rincon Ridge ceanothus fruits are 4 to 6 mm (0.16 to 0.24 in) wide and can be either smooth or with three ridges distally (Burge and Wilken 2020). Fruits have slender horns on them that are 1.5 to 2.5 mm (0.06 to 0.1 in) long (Burge and Wilken 2020).

2.2 Species Taxonomy

Rincon Ridge ceanothus was first collected by C. C. Parry in the late 1800s but was not formally described as a distinct species, *Ceanothus confusus*, until 1939 (Howell 1939; CCH 2026). In 1951, Leroy Abrams moved Rincon Ridge ceanothus to a subspecies of *Calistoga ceanothus* (*C. divergens* subsp. *confusus*) since it is often considered a weakly defined species (Abrams 1951). In 2015, Burge et al. moved Rincon Ridge ceanothus to a variety of *Calistoga ceanothus* (*C. divergens* var. *confusus*) (Burge et al. 2015). In 2017, Guy Nesom treated Rincon Ridge ceanothus as a full species, *C. confusus*, but noted that it may best be treated as part of *C. divergens* and in 2020, the Jepson eFlora treated Rincon Ridge ceanothus as a full species, *C. confusus* (Nesom 2017; Burge and Wilken 2020). The currently accepted name for Rincon Ridge ceanothus is *Ceanothus confusus* (Burge and Wilken 2020).

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. In 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 Rincon Ridge ceanothus.

The petition provides a physical description of Rincon Ridge ceanothus, with descriptions of its habit, stems, leaves, flowers, fruits, and seeds. The petition contrasts Rincon Ridge ceanothus with the physical properties of two similar species, mahala mats (*C. prostratus* var. *occidentalis*) and Calistoga ceanothus (*C. divergens*). The petition describes Rincon Ridge ceanothus as an evergreen shrub that blooms February through June and is pollinated by insects. The petition states that the growth and reproduction of Rincon Ridge ceanothus has not been specifically studied but the genus has been well studied with *Ceanothus* seeds shown to disperse short distances and may remain dormant in the soil for multiple years. The petition also describes how fire will kill Rincon Ridge ceanothus individuals but that the species depends on post-fire establishment of new individuals to persist.

3.1.1 Department Assessment

The Department considers the information provided in the petition on the life history of Rincon Ridge ceanothus 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 Rincon Ridge ceanothus. Section C on page 4 of the petition provides information on its distribution. Section L, Figure 2 on page 22 of the petition provides a distribution map, which has been provided as Figure 1 of this petition evaluation.

The petition describes Rincon Ridge ceanothus as a California endemic of the southern North Coast Ranges. The petition states that Rincon Ridge ceanothus's range comprises approximately 3,180 square kilometers (1,228 square miles), and that it occurs in Lake, Mendocino, Napa, and Sonoma counties at elevations of 75 to 1,065 meters (245 to 3,495 feet). The petition states that Rincon Ridge ceanothus is known from 33 sites that were documented between 1927 and 2008, with two of those sites likely extirpated. Sixteen 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 also mentions that Rincon Ridge ceanothus likely occupies a few additional, undocumented sites.

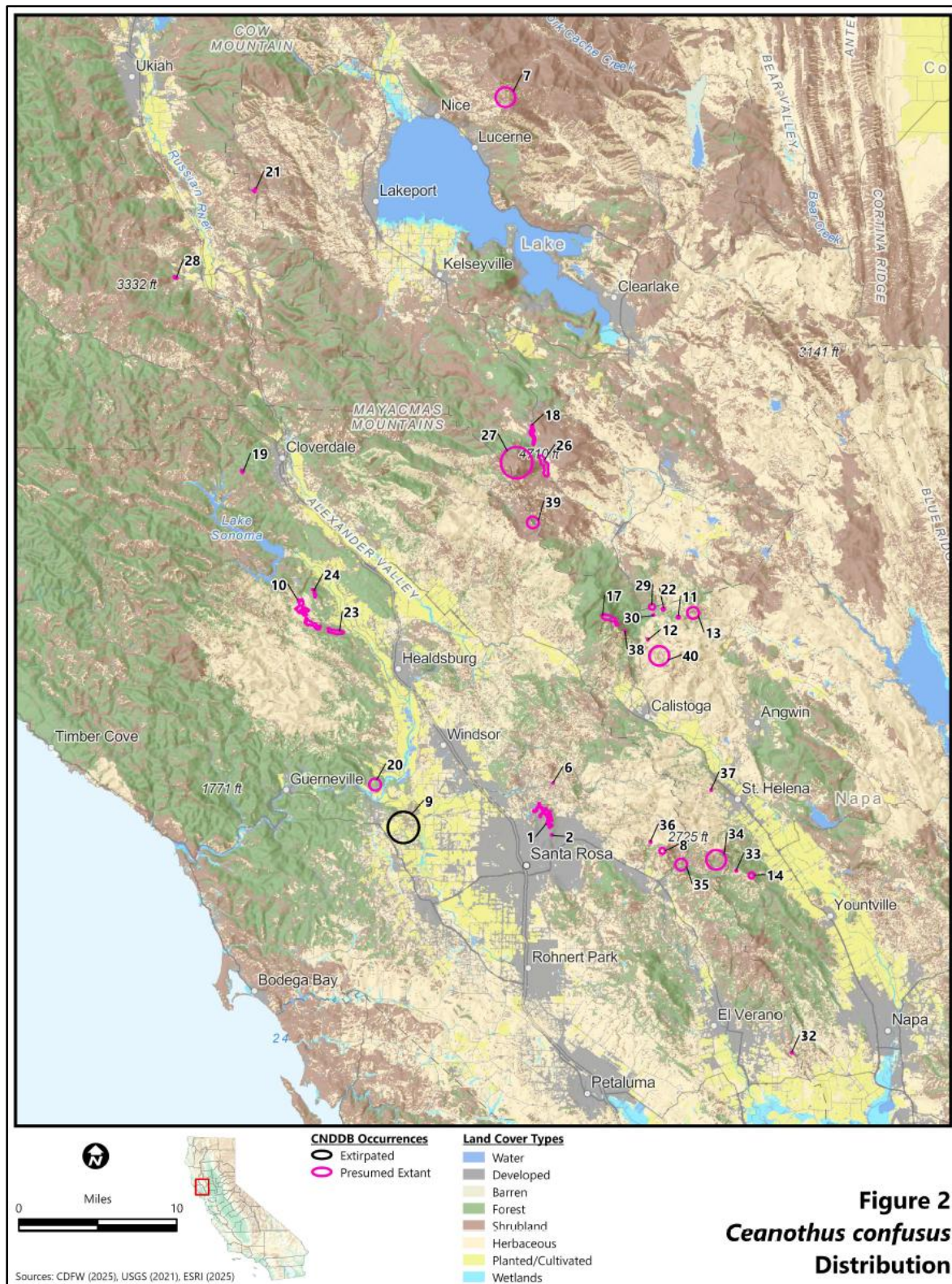


Figure 1. Map of the range and distribution of Rincon Ridge ceanothus as provided in Figure 2 of the petition. Occurrences from the California Natural Diversity Database (CNDDDB) are labeled with CNDDDB occurrence numbers. Some occurrences consist of multiple polygons.

3.2.1 Department Assessment

Range and distribution of Rincon Ridge ceanothus are presented in the petition based primarily on data from the California Natural Diversity Database (CNDDB); however, no discussion is provided on the completeness of the information presented including whether the CNDDB 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 CNDDB 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 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 range and distribution of Rincon Ridge ceanothus.

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 Rincon Ridge ceanothus survival.

The petition states that Rincon Ridge ceanothus occurs in chaparral and woodlands, often growing on substrates derived from serpentinite or volcanic rocks. The petition also lists three species that are associated with Rincon Ridge ceanothus.

3.3.1 Department Assessment

The Department considers the information provided in the petition on the kind of habitat necessary for Rincon Ridge ceanothus 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 Rincon Ridge ceanothus. Section A on pages 3 and 4 of the petition provides information on the population trend of Rincon Ridge ceanothus.

The petition summarizes information on the abundance of Rincon Ridge ceanothus at ten CNDDDB occurrences with plant counts ranging from 30 to more than 1,500 plants at each occurrence. The petition states that range-wide monitoring of Rincon Ridge ceanothus 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 747 hectares (1,845 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, Rincon Ridge ceanothus has had a decreasing population trend because of loss and degradation of occupied habitat at nine or more of the 33 sites where the species has been observed. The petition lists six occurrences that are either extirpated, have a declining population trend, or fair population viability in the CNDDDB and reports seven 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 habitat losses, population reductions, or both that occurred before the distribution of Rincon Ridge ceanothus was well documented.

3.4.1 Department Assessment

Abundance of Rincon Ridge ceanothus 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. 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 Rincon Ridge ceanothus is determined in the petition to be declining based on: 1) the number of CNDDDB occurrences that are designated as extirpated, with a declining population trend, or with a fair 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 chaparral and woodland habitats. 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

Rincon Ridge ceanothus occurrences or whether population declines at some occurrences have resulted in a population decline throughout the species' range. The petition uses CNDDDB polygon data overlaid 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 chaparral and woodland habitats likely causing additional, undocumented habitat losses, population reductions, or both to Rincon Ridge ceanothus are too general and do not specifically identify impacts to habitat likely to have contained Rincon Ridge ceanothus.

The Department does not have any 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 abundance and population trend of Rincon Ridge ceanothus.

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 8 through 12 of the petition provides information on factors affecting the ability of Rincon Ridge ceanothus 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 Rincon Ridge ceanothus.

The petition lists several prominent range-wide threats to Rincon Ridge ceanothus: agricultural and developed land uses, disruptions to post-fire recovery, vegetation management to reduce fire risks, and climate change. The petition also mentions that grazing, logging, recreational use including off-road vehicle activity, road/trail construction/maintenance, and wood cutting/brush clearing 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 Rincon Ridge ceanothus 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 Rincon Ridge

ceanothus, 71% of specifically mapped occurrences likely have experienced loss or degradation of habitat due to agriculture and development and additional occurrences are threatened by agriculture and development. The petition states that Rincon Ridge ceanothus is highly vulnerable to extirpation after a fire. The petition describes how fire kills Rincon Ridge ceanothus and the species depends on post-fire recruitment of new individuals from seed stored in the soil to replenish the population. The petition notes that new seedlings are vulnerable to competition from other plants, weather, herbivory, and human activities. The petition states that managing vegetation to reduce wildfire risks to lives and property threatens Rincon Ridge ceanothus by removing woody vegetation from wildlife-urban interfaces for fuel reduction and firebreak creation.

The petition states that climate change directly and indirectly threatens Rincon Ridge ceanothus 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 Rincon Ridge ceanothus is uncertain but may be substantial, particularly because of the species' limited range, rarity, habitat specificity, and distribution in relatively small and isolated areas.

The petition states that without additional management actions, there is a moderate to high likelihood that Rincon Ridge ceanothus will be extirpated from much of its range or become extinct. The petition mentions that this may occur because: most occurrences are threatened and the severity of some threats is increasing; the species has been documented at sites that are small in area, fragmented, or with few individuals; and many 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 Rincon Ridge ceanothus to survive and reproduce, and the degree and immediacy of threats, are presented in the petition based on occurrence level threat data reported in the CNDDDB and threat data from other sources. 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 as a threat to Rincon Ridge ceanothus that is not listed in the CNDDDB. None of these threats are described in adequate detail in relation to Rincon Ridge ceanothus 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 Rincon Ridge ceanothus.

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

While much of the threat information in the petition is not presented in enough detail to ascertain how the threats are directly impacting Rincon Ridge ceanothus, the petition also provides information on the effect of fire on Rincon Ridge ceanothus and how fire kills Rincon Ridge ceanothus, but post-fire recovery is essential for the species to recruit new individuals from seed stored in the soil. The petition describes how short intervals between fires, postfire competition from invasive plants, fuel reduction treatments, and firebreak creation could threaten the species.

The Department considers the discussion of specific threats to Rincon Ridge ceanothus from disruptions to post-fire recovery and vegetation management to reduce fire risks as adequate information for the factors affecting the ability of Rincon Ridge ceanothus to survive and reproduce (threats). However, the discussion of the degree and immediacy of these threats to Rincon Ridge ceanothus in the petition is not adequate and the Department does not have additional, readily available information to compensate for deficiencies in data for this topic.

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 Rincon Ridge ceanothus.

The petition states that management of Rincon Ridge ceanothus 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 Rincon Ridge ceanothus as having no legal protections but notes that Rincon Ridge ceanothus 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 also notes that Rincon Ridge ceanothus has been designated by the Bureau of Land Management as a sensitive species and impacts to the species should be considered during environmental review under the National Environmental Policy Act.

The petition states that approximately 14% of occurrences of Rincon Ridge ceanothus are on land managed for biodiversity and 5% of occurrences are on land managed for multiple uses. The petition mentions that seeds of Rincon Ridge ceanothus have been collected and placed in long-term storage at the Santa Barbara Botanic Garden.

The petition notes that six occurrences of Rincon Ridge ceanothus are at least partially protected on lands that are managed to maintain habitats, and that land managers routinely implement avoidance and minimization measures for the habitats. The petition mentions that none of the Rincon Ridge ceanothus occurrences are the subject of systematic, formal monitoring.

The petition states that no efforts have been made to restore or create habitat occupied by Rincon Ridge ceanothus. The petition discusses how surveys have not been conducted to confirm the continued existence of Rincon Ridge ceanothus at all occurrences, surveys have not been conducted to more precisely map nonspecific occurrences of Rincon Ridge ceanothus, 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' habitat requirements, growth, pollination, dispersal, population dynamics, or other aspects of its ecology. The petition notes that ceanothus species in general have been extensively studied and studies on the ecology of other ceanothus species provide some understanding of Rincon Ridge ceanothus' ecology.

3.6.1 Department Assessment

The Department considers the information provided in the petition on impact of existing management efforts on Rincon Ridge ceanothus 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 Rincon Ridge ceanothus.

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,
- develop and implement site-specific monitoring and management plans,
- implement compatible grazing practices,
- implement compatible fuel reduction treatments,
- implement measures to prevent impacts from recreational activities,
- establish a memorandum of understanding with county transportation agencies involved with maintenance activities that have the potential to affect occupied habitat,
- coordinate and share information among organizations working to conserve the species,
- restore degraded, occupied habitat,
- establish additional populations,
- conduct surveys to improve data on distribution and abundance,
- document genetic diversity, and
- investigate the species' habitat requirements and population ecology 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 Rincon Ridge ceanothus 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 21 of the petition provides the sources of information used in the Rincon Ridge ceanothus 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 Rincon Ridge ceanothus.

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 Rincon Ridge ceanothus 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 Rincon Ridge ceanothus, the Department has determined that information is lacking for the following petition components: range, distribution, abundance, population trend, 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 Rincon Ridge ceanothus under CESA may be warranted and recommends the Commission reject the petition and not consider it further under CESA.

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