December 6, 2023

The Honorable Michelle Lujan Grisham Governor of New Mexico 490 Old Santa Fe Trail, Room 400 Santa Fe, NM 87501

Dear Governor Lujan Grisham,

WildEarth Guardians and the 8,534 of our supporters who have signed the attached petition would like to thank you for your leadership in allowing the Mexican wolf (lobo) Asha to roam across historic and suitable habitat in the Jemez Mountains without capture. Asha is doing what all wild animals (and especially wolves) do in dispersing and searching for new territory and a mate. We encourage you to continue to guide the New Mexico Department of Game and Fish in allowing Asha to be free.

This, her second journey to northern New Mexico in 2023, has captured the imagination of thousands of wildlife lovers and conservationists across the country and around the world. She has made a lasting and invaluable impression on people who have encountered her. A recent comment in the Santa Fe New Mexican by an elk hunter is testament to this:

"I heard Asha howl on Monday (11/27) in the Valles Caldera about 7:00PM as we were packing out a cow elk. The moon had risen above the east side of the caldera and she let out a huge howl that sounded as if she was looking for a mate. This was no coyote. A single large howl, and very deep. Absolutely stunning. She was in the Obsidian Valley Trail area within a mile from where we were standing. I will never forget it. Hopefully she will find the carcass of the cow we harvested. I'm sure she will, and have meat for days. I say let the wolves roam and maybe even bring her a mate."

We and our members share this sentiment, and we are grateful that New Mexico is currently enabling these kinds of experiences of true wildness by letting Asha roam.

Along with allowing Asha to continue her journey, we would like you to **revisit the state's formal opposition to allowing Mexican wolves north of the arbitrary boundary that is Interstate 40**, which was expressed in <u>a letter signed by Governor Martinez in 2015</u>. This position was problematic at the time, and it remains antiscientific and antithetical to the letter and spirit of the Endangered Species Act. It also, unfortunately, remains forefront in the U.S. Fish and Wildlife Service's inability to explore northern recovery areas for the lobo.

- The need for recovery of Mexican wolves north of Interstate 40 is supported by scientific literature and aligns with the goals of the Endangered Species Act. The current climate crisis underscores the need for expanded northward and elevational habitat ranges for imperiled species, allowing for spatial adaptation to changing landscape conditions.
- Wolves are already moving north, following their natural dispersal instincts to seek new territories and unrelated potential mates. At least 8 wolves have roamed north of Interstate 40 since the project's inception.

• The Endangered Species Act is supposed to recover species using the best available science, and the Interstate 40 boundary is an arbitrary political boundary, not in any way a biological or ecological one.

Additionally, since the 2015 letter was sent, three significant things have changed for Mexican wolves and their geography:

- Recovery in Mexico has stalled out. In September 2023, the Service estimated there are fewer than 15 wolves in the wild population in Mexico. Mexico has temporarily suspended wild releases. Despite over 70 adult and family pair releases since 2012, the median known wild survivorship of wolves is just 78 days, and there are currently zero collared wolves in the wild in Mexico.
- The U.S. Fish and Wildlife Service recognized in its final rule "Endangered and Threatened Species: Designation of Experimental Populations," published on July 3, 2023 (88 FR 42642), that the 1982 10j regulations which restricted species recovery efforts to "historic habitat" did not anticipate the impacts of climate change on species or their habitats. In supporting this rule change, the Service stated that "it may be increasingly necessary and appropriate to establish experimental populations outside of their historical range if the species' habitat has undergone, is undergoing, or is anticipated to undergo irreversible decline and is no longer capable of supporting the species due to threats such as climate change or invasive species." This is clearly now relevant to the recovery of Mexican gray wolves.
- Colorado chose to reintroduce northern gray wolves to the state, and has so far declined to consider introducing Mexican gray wolves. The science shows that a zone of intergradation between Mexican wolves and gray wolves historically occurred in the Southern Rockies. Occasional interbreeding of wolf subspecies in northern New Mexico and southern Colorado would benefit the existing Mexican wolf population in southwestern New Mexico and southeastern Arizona, which would be connected through long-distance dispersing wolves. The benefit would come in the form of diversifying the impoverished gene pool of the current Mexican wolf population.

Conversely, if Mexican wolves are not present in the Southern Rockies, this region will be inhabited by reintroduced northern gray wolves, some of whom would similarly disperse and reach the current Mexican wolf population. The difference in scenarios is that, if Mexican wolves inhabit the San Juans, the center of subspecies intergradation would occur in west-central Colorado and not in central or southern New Mexico and Arizona.

We are happy to provide the data and scientific literature that supports what we have summarized here. We would like the opportunity to discuss this needed policy change with you further at your earliest convenience.

Sincerely,

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