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August 13, 2025

Public Comments Processing
Attn: FWS-R2-ES-2022-0001
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041-3803

Subject: Letter of Support for the Proposed Removal of Gila Chub from the List of Endangered and Threatened Wildlife, NMERT #4731

To Whom it May Concern,

The New Mexico Department of Game and Fish and New Mexico Interstate Stream Commission, collectively The Agencies, are writing to express support for the proposed removal of Gila Chub *Gila intermedia* from the List of Endangered and Threatened Wildlife.

As summarized in the updated addendum to the Species Status Assessment (2024), the US Fish and Wildlife Service sufficiently demonstrated that the literature does not support Gila Chub as taxonomically distinct from Roundtail Chub *Gila robusta* and Headwater Chub *Gila nigra*. While past studies have oscillated on the matter, the best available science currently supports the classification of these historically putative species under one species, *Gila robusta* (DeMarais 1992; Schwemm 2006; Schönhuth et al. 2014; Dowling et al. 2015; Moran et al. 2017; Carter et al. 2018; Copus et al. 2018; Page et al. 2023; Suchocki et al. 2023). The Agencies strongly support listing decisions that reflect the best available science.

Having a clear understanding of the listing status of the *Gila* complex fishes will result in more scientifically sound and effective conservation measures. If you have any questions, please contact Mariah Giardina at mariah.giardina@dgf.nm.gov or (505) 618-0496.

Sincerely,

Kirk Patten
Chief, Fisheries Management Division

cc: Colleen Cunningham, New Mexico Interstate Stream Commission