



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

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March 27, 2014

Dan Ashe, Director  
Public Comments Processing  
Attn: Gray Wolf-Docket No. [FWS-HQ-ES-2013-0073]  
Division of Policy and Directives Management  
U.S. Fish and Wildlife Service  
4401 North Fairfax Drive, MS 2042-PDM  
Arlington, Virginia 22203

Dear Mr. Ashe:

Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service's (USFWS) Federal Register FWS-HQ-ES-2013-0073 proposal for "Removing the Gray Wolf (*Canis lupus*) From the List of Endangered and Threatened Wildlife and Maintaining Protections for the Mexican Wolf (*Canis lupus baileyi*) by Listing It as Endangered." The Washington Department of Fish and Wildlife (Department) is providing the following updates on the status of wolves in Washington and this letter is intended to simply augment our comments submitted on December 13, 2013, consistent with your request for additional information.

Washington's wolf population has continued to expand rapidly. At the end of December 2013, there were 13 confirmed wolf packs in Washington State; 3 of which were packs in the North Cascades, west of the Northern Rocky Mountain Distinct Population Segment (NRM DPS) (Figure 1). Of the 13 packs, 5 met the definition of "successful breeding pair" (SBP). Of these, 2 (Teaway and Lookout) were in the North Cascades, west of the NRM DPS. The Teaway pack has met the requirement of a SBP for the last 3 consecutive years; Lookout met the requirement in 2008, 2009, and 2013.

In terms of population growth, trends in the number of packs, minimum wolf count and SBP all reflect rapid growth. The observed annual growth rate (based on the minimum number of wolves counted) was 39% between 2008 and 2013. Consistent with rapid population growth, the average number of known wolf mortalities per year remains relatively low. Since 2008, 16 wolf mortalities have been documented in Washington, corresponding to 2.7 per year. This includes a Department control action which has occurred in one pack since 2008. Based on the growth rate of wolves in the Northern Rocky Mountains and the observed growth in Washington since 2008, Washington may reach state recovery objectives by 2021 (Malezke et al. In Press).

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In terms of the taxonomic origin of wolves in re-colonizing Washington, *Canis lupis occidentalis* appears to be more rapidly colonizing Washington compared to *Canis lupis nubilus*. Genetic samples taken by the Department, indicate that of the 13 confirmed packs, only Teanaway and Lookout are a mixture of *C. l. occidentalis* and *C. l. nubilus* (genetic information is not available for the Wenatchee pack). No packs of solely *C. l. nubilus* have been documented in Washington.

The state of Washington has listed wolves as endangered at the species level and our Wolf Conservation and Management Plan's recovery and management objectives are reflective of a sustainable statewide population of wolves. Washington's wolf population is contiguous with populations in British Columbia and the Rocky Mountain states and, as such, we anticipate that if there are adaptive advantages embodied by a particular sub-species, it will play out naturally during wolf re-colonization of our state.

Thank you again for the opportunity to comment on the proposed rule.

Sincerely,



Philip Anderson  
Director

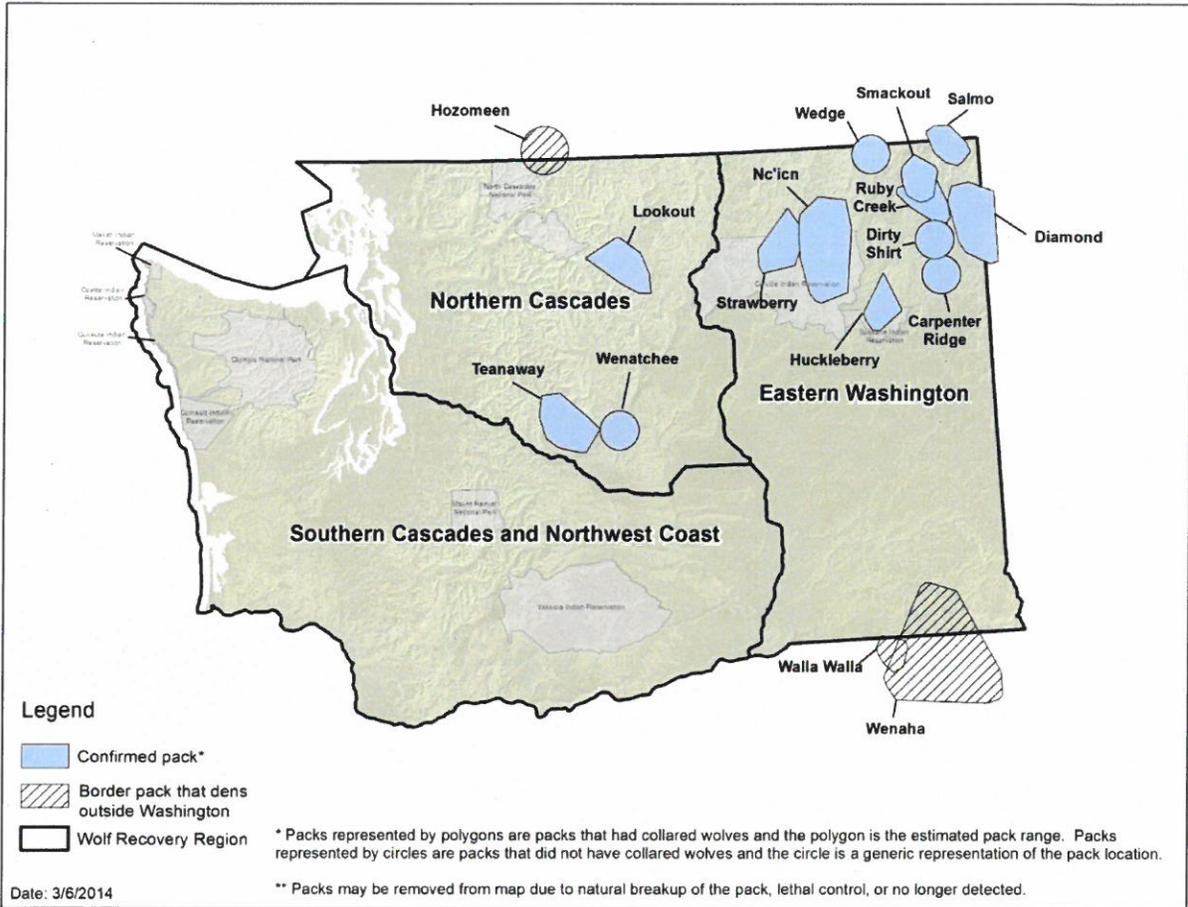


Figure 1. Washington wolf packs, December 2013.