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**U.S. House of Representatives**  
**Committee on Natural Resources**  
**Washington, DC 20515**

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October 21, 2014

Neil Kornze  
Director, U.S. Bureau of Land Management  
1849 C Street NW, Rm. 5665  
Washington, DC 20240

Dear Director Kornze:

Thank you for having your Idaho State Director, Timothy Murphy, respond to my letter of October 10<sup>th</sup>, and for granting an extension of the public comment period for the Idaho Predator Hunt Derby (Derby) permit application Environmental Assessment (EA). Based on a more thorough review of the EA, I am writing today to ask respectfully that you deny the permit application for the Derby.

The EA raises more questions than it provides answers, and is not a thorough analysis of the potential environmental impacts of the Derby. For example, the assertions that predatory species would be harvested at approximately the same levels whether or not the Derby occurs, and that hunter presence on BLM land during the Derby would be equal to hunter presence on a non-derby day, are very poorly reasoned and not well substantiated. In fact, those assertions are counter to the stated objective of the Derby organizers: to increase hunting pressure on – and killing of – wolves and coyotes. Further, the claim that cultural and environmental resources would not be impacted must be reconsidered in light of the Shoshone-Bannock Tribes' opposition to the Derby. The EA also inappropriately dismisses the potential impact that this kind of hostile activity could have on the wildlife tourism economy of Idaho. Finally, the management approaches and goals of Idaho Fish and Game, as stated in the EA, are at odds with the best available science. It has not been demonstrated that predators like wolves have a negative impact on populations of game species like elk; rather they restore balance to the ecosystems necessary to support healthy populations of all game and non-game wildlife species. In fact, a U.S. Geologic Survey peer reviewer recently recommended that Idaho focus on restoration of habitat – not persecution of wolves – to improve elk populations.<sup>1</sup>

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<sup>1</sup> Peer review comments from Dr. Mark Boyce, Department of Biological Sciences, University of Alberta, *IDFG Draft Proposal to Remove Wolves from the Lolo Zone*. (Available online: <http://www.fws.gov/idaho/graywolves/FinalEA/Lolo10appendB.pdf>).

Perhaps more importantly, though, this proposed activity is clearly inconsistent with BLM's mission "to sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations." Allowing the Derby to take place on BLM land would be yet another blow to conservation of one of the West's most iconic animals and undermines more than twenty years of Federal recovery efforts.

Since Congress took the unprecedented step of legislatively removing gray wolves in several Western states from the Endangered Species list in 2011 — a decision that was based on politics not science — the State of Idaho has pursued a policy of eradication, not management, of wolves. In just three years, the wolf population in Idaho has fallen 14%, and the state has made it clear that it wants to reduce the number of wolves within its borders to the bare minimum of 150 animals allowed under an agreement with the U.S. Fish and Wildlife Service. That agreement is based loosely on a 30-year old wolf recovery plan that has never been reevaluated in light of the best available science.

Idaho has been unwavering in pursuit of this goal. In addition to carrying out aerial gunning operations to kill 23 wolves in the Lolo Elk Zone and sending a trapper into the Frank Church River of No Return Wilderness to kill more wolves without notifying the U.S. Forest Service, Idaho has dedicated \$2 million in state funds to establish a "wolf control board" to oversee its relentless persecution of gray wolves.

American taxpayers have spent millions of dollars to begin recovering native wolf populations. Now states like Idaho are trying to destroy all the progress that has been made. Federal lands and resources should not be used in furtherance of that misguided goal and to undermine the Federal investment. These animals are recovering with the help of taxpayers from all 50 states, and should be managed responsibly for the benefit of all Americans, not eliminated to serve the narrow interests of a few. Wolves in and around Yellowstone National Park, for example, generate \$30 million per year in tourism-related spending, and science has shown that healthy wolf populations help restore ecosystems and do not negatively impact elk or other game species.

The proposed Derby will be detrimental to the recovery of the species, and, importantly, it is not an appropriate use of BLM land held in trust for the people of the United States. I urge you to reject the special recreation permit application submitted for this purpose by Idaho for Wildlife. Gray wolves in Idaho face enough threats already from state government, and authorizing this event would give further credence to Idaho's misguided policy of wolf eradication. Please do not hesitate to contact Matt Strickler on the Natural Resources Committee Staff at (202) 226-9838 or [matt.strickler@mail.house.gov](mailto:matt.strickler@mail.house.gov) if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter A. DeFazio", is written over a horizontal line.

Peter A. DeFazio

Ranking Member, Committee on Natural Resources