



Via E-Mail

May 3, 2021

The Honorable Deb Haaland
Secretary of the Interior
1849 C Street N.W.
Washington, DC 20240
doiexecsec@ios.doi.gov

Martha Williams, Principal Deputy Director
U.S. Fish and Wildlife Service
1849 C Street N.W.
Washington, DC 20240
Martha_Williams@fws.gov

Re: Idaho's Wolf Extermination Legislation Makes the State Ineligible for Pittman-Robertson Act Funds

Dear Secretary Haaland and Principal Deputy Director Williams:

On behalf of the Center for Biological Diversity, we ask that you find the State of Idaho ineligible to receive funds under the Pittman-Robertson Act if it passes and implements Senate Bill 1211, which removes nearly all limits on wolf hunting and authorizes hunters and private contractors to exterminate 90 percent of the state's wolf population. The Center is a nonprofit organization dedicated to the protection and restoration of biodiversity.

Senate Bill 1211 authorizes the death of more than 1,300 of the state's wolves, out of a population of approximately 1,500 wolves. It would let individuals trap and snare wolves on private property year-round, hunt them from all-terrain vehicles using bait and at night, and purchase an unlimited number of wolf tags. The bill also increases funding for killing wolves to artificially inflate elk populations.¹ The Idaho Department of Fish and Game opposes the legislation, which supersedes its authority to manage these ecologically important carnivores.²

The full Senate passed the bill on April 21 by a vote of 26-7-2, and the House passed it 58-11-1 on April 27. If Governor Brad Little fails to veto the bill, the legislation would soon be

¹ Senate Bill 1211, available at <https://legislature.idaho.gov/sessioninfo/2021/legislation/S1211/>.

² Keith Ridler, *Bill to increase killing of Idaho wolves clears House panel*, Associated Press (April 22, 2012), available at <https://apnews.com/article/bills-idaho-wolves-environment-and-nature-lifestyle-4c74d048aead83a5804e813f4419179d>.

implemented with the goal of reducing the state's wolf population to the threshold triggering return to protection under the Endangered Species Act, 16 U.S.C. § 1531 et seq.

Through the Pittman-Robertson Act and Sport Fish Restoration Act, Congress has authorized the Secretary of the Interior to distribute funds to states to support critical conservation and outdoor recreation projects.³ Federal regulations implementing the Acts provide that a state “becomes ineligible to receive the benefits” of the Acts if it “passes legislation contrary to the Acts.”⁴ Because Senate Bill 1211 aims to reduce Idaho's wolf population to the brink of extinction, it is contrary to the Pittman-Robertson Act, which prioritizes wildlife conservation.⁵ Indeed, the purpose of the Act is to “assure sound conservation policies” “for the benefit of a diverse array of wildlife” “in recognition of the primary role of the States to conserve all wildlife.”⁶

Last year, the State of Idaho received more than 18.5 million dollars in funding authorized by the Acts, and it has received more than 75 million dollars over the last five years.⁷ Such conservation funds should only be entrusted to states that have demonstrated their commitment to conservation of all wildlife.

Because Idaho seeks to exterminate its wolf population through passage of Senate Bill 1211, we ask that you immediately notify the State of Idaho that passage and implementation of the bill disqualifies it from any future allocation of the Acts' conservation funds.

Sincerely,



Collette L. Adkins
Carnivore Conservation Director
Center for Biological Diversity

³ Federal Aid in Wildlife Restoration Act (“Pittman-Robertson Act”), 16 U.S.C. §§ 669-669i; Federal Aid in Sport Fish Restoration Act (“Dingell-Johnson Act”), 16 U.S.C. §§ 777-777k.

⁴ 50 CFR § 80.11.

⁵ *See, e.g.*, 16 U.S.C. § 669 (requiring states to “have passed laws for the conservation of wildlife”); 16 U.S.C. § 669a (defining “conservation” as “the use of methods and procedures necessary or desirable to sustain healthy populations of wildlife”); 16 U.S.C. § 669c(e)(1)(B)(i) (requiring states to have a plan to develop and implement “wildlife conservation projects that expand and support existing wildlife programs, giving appropriate consideration to all wildlife”).

⁶ Pub. L. 106-553, §1(a)(2) [title IX, §902(a), (b)] (Dec. 21, 2000).

⁷ U.S. Fish and Wildlife Service, *Press Release: Sportsmen and Women Generate Nearly \$1 Billion in Conservation Funding* (March 19, 2020), available at [https://www.fws.gov/news/ShowNews.cfm?ref=sportsmen-and-women-generate-nearly-\\$1-billion-in-conservation-funding-&_ID=36532](https://www.fws.gov/news/ShowNews.cfm?ref=sportsmen-and-women-generate-nearly-$1-billion-in-conservation-funding-&_ID=36532); Congressional Research Service, *Pittman-Robertson Wildlife Restoration Act: Understanding Apportionments for States and Territories* (April 5, 2019), available at <https://fas.org/sgp/crs/misc/R45667.pdf>.

Andrea Zaccardi
Senior Attorney
Center for Biological Diversity

cc:

The Honorable Brad Little
Governor of Idaho
governor@gov.idaho.gov

Ed Schriever, Director
Idaho Department of Fish and Game
ed.schriever@idfg.idaho.gov