



Idaho Farm Bureau Federation

500 West Washington Street
Boise, Idaho 83702
(208) 342-2688

On behalf of the more than 90,000 members of the Idaho Farm Bureau Federation (IFBF)—the largest general farm organization in Idaho—these comments are submitted in strong support of APHIS conducting a survey to gather feedback on livestock losses experienced by producers and their interactions with Wildlife Services. This survey is crucial for guiding the future of predator control in Idaho and is essential for the agency to fulfill its statutory duties.

IFBF members frequently engage with Wildlife Services on a range of predator-related issues, including coyote control and investigations into depredation incidents. Feedback from our members indicates a diverse range of opinions regarding the investigation and confirmation process. Some producers have expressed positive experiences, while others have voiced frustrations that have led them to discontinue contacting Wildlife Services, feeling that their cases are not investigated fairly or uniformly. Documenting both the strengths and shortcomings of the program through this survey will ultimately benefit all producers.

To ensure the survey provides a comprehensive understanding of producer experiences, we strongly recommend expanding its scope to include:

1. **Producers Beyond Current Service Users:** The survey should not be limited to producers currently receiving predator damage management services. Many have disengaged from Wildlife Services due to dissatisfaction with the confirmation and investigation process. Including these individuals is critical to obtaining an accurate and balanced assessment of the program.
2. **Both Lethal and Nonlethal Control Methods:** The proposed emphasis on nonlethal control tells only part of the story. It is equally important to assess the effectiveness of lethal control methods in reducing livestock losses. For example, Idaho's Wolf Depredation Control Board has provided funding for producers to access third-party resources for legal, lethal wolf control. Wildlife Services has also played a role in lethal wolf reduction efforts. Comparing the effectiveness of nonlethal and lethal strategies will provide actionable insights for improving predator management.

In addition to broadening the survey's focus, it would be beneficial to analyze complementary efforts at the state level. During the 2024 Idaho Legislative Session, the state appropriated \$150,000 to reimburse producers for confirmed, and in some instances probable, losses caused by wolves and grizzly bears and \$75,000 for conflict prevention. The state will fund activities such as guard dogs and supplies, scare devices, temporary pens and sheds, temporary or permanent electric fencing, game cameras, GPS collars for livestock, secure feed or trash storage, range riders, drive over electric mats, increased human presence, carcass removal, band kits, reinforced grain bin doors, and other preventative measures vetted by the state. The state of Idaho also has funding sources to aid producers in lethal and nonlethal control of black bears and mountain lions as well as reimbursements for damages or death.

Understanding the interplay between federal and state investments in predator management—and evaluating the outcomes of both lethal and nonlethal methods—will yield a more complete picture of the challenges and successes faced by Idaho livestock producers.

Finally, we urge APHIS to design a survey that accommodates producers' varied experiences and provides opportunities for detailed feedback. Limiting responses to bubble-style questionnaires focused solely on prevention measures would overlook critical aspects of producers' interactions with Wildlife Services. Open-ended questions and narrative responses are essential for capturing the nuanced, fact-specific nature of these experiences. Additionally, recognizing that many livestock producers live in remote areas with limited access to internet or electronic submission options, the survey must allow alternative response methods and a sufficiently long response period to ensure participation from as many producers as possible.

IFBF will happily assist APHIS in distributing this survey to our members who have engaged with Wildlife Services.