

Idaho Wool Growers Association

Organized September 1893, At Mountain Home, Idaho

OFFICERS

Jack Blattner
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December 20, 2024

United States Department of Agriculture
Regulatory Analysis and Development, PPD, APHIS
Station 2C-10.16, 4700 River Road, Unit 25
Riverdale, MD 20737-1238

Re: Docket No. APHIS-2024-0053

To whom it may concern,

DIRECTORS

Frank Shirts
Western District

Blake Ball
Eastern District

Mark Henslee
Central District

Dino Vinci
Northern District

The Idaho Wool Growers Association (IWGA) was established in 1893 as the primary voice for the sheep industry in Idaho. Our members raise and run sheep across Idaho on private, state and federal lands. Currently, the sheep and lamb inventory in Idaho is tallied at approximately 235,000 animals with a significant portion of those animals grazing on public land.

IWGA appreciates the opportunity to comment on this request for information collection by the Animal and Plant Health Inspection Service (APHIS). IWGA encourages that commenting be available to producers who have utilized Wildlife Services and nonlethal measures. Additionally, IWGA is in support of communication relating to only general trends and findings communicated to departments and teams, with no specifics relating to individual producers or operations being shared or disseminated. It is important to the IWGA that risk for bias or retaliatory action be minimized in the effort to encourage livestock producers to openly share feedback within this survey opportunity.

DIRECTORS AT LARGE

Forrest Arthur

Carol Finney

Elizabeth Moss

One of the biggest deterrents that sheep producers utilize are guard dogs. However, in the past several years we have seen this deterrent become less of a deterrent. Predators will often harm or kill guard dogs to take the prey they seek. Additionally, due to the nature of how bands are distributed and the need for full-time herders with bands creates the simple presence of a deterrent. However, the deterrent of a person is becoming less of a deterrent. We would seek the opportunity for these members to provide comment on non-lethal uses.

In conclusion, the IWGA is in support of a survey to be conducted for information gathering and performance review purposes related to APHIS and producer perceptions of predators and predator damage management methods.

Sincerely,

Jack Blattner
President

Liz Wilder
Executive Director