



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

December 12, 2024

Re: Docket No. APHIS-2024-0053

To whom it may concern,

The Idaho Cattle Association (ICA) is the official voice for all segments of the beef industry in Idaho, from seedstock breeders to commercial operators to cattle feeders. ICA is the grassroots policy development organization for Idaho's second-leading agricultural industry, and is unique in that the membership spans to every corner of Idaho.

ICA appreciates the opportunity to comment on this request for information collection by the Animal and Plant Health Inspection Service (APHIS). To properly conduct the survey and receive a true blend of comments from producers who have “received predator damage management services”, we would support APHIS making this opportunity specifically available, and limited, to any livestock producer that has utilized such services during the past decade. ICA feels strongly that the need to go back in the logs further than might be typical is exemplified by the fact that many producers have declined to contact APHIS agents because they have been dissatisfied with the lack of customer service received in the field. Input from customers of industry should be received on a regular basis by all arms of agency and it is our opinion APHIS is no different in the expectation that statutory duty be regularly & properly evaluated through performance reviews by this group.

It is our recommendation that the type of survey modality be considered as well – while radio button, multiple choice, or check box surveys have the efficiency of speed, it is crucial that producers be given an opportunity for open form text that will allow them to elaborate on explicit examples. We would encourage open commenting be available to only producers who have utilized said services in the aforementioned timeframe of one decade. Additionally, ICA is in support of communication relating to only general trends & findings be communicated to departments and teams, with no specifics relating to individual producers or operations being shared. It is important to us, as well as our members, that risk for bias or retaliatory action be minimized in the effort to encourage livestock producers to openly share feedback within this survey opportunity.





In conclusion, ICA is in support of a regular & thorough survey to be conducted for information gathering and performance review purposes, as it relates to APHIS & producer perceptions of predators & predator damage management methods.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Mulroney". The signature is fluid and stylized, with a long horizontal stroke at the end.

Cameron Mulroney
Executive Vice President
Idaho Cattle Association

