

**From:** [Patxi Larrocea-Phillips](#)  
**To:** [Rulemaking](#)  
**Cc:** [Liz Wilder](#)  
**Subject:** DOCKET: 20-0501-2301  
**Date:** Wednesday, July 19, 2023 4:34:26 PM  
**Attachments:** [image001.png](#)  
[IDL Comments.pdf](#)

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Please see the attached comments.

Thank you,

***Patxi Larrocea-Phillips***

Idaho Wool Growers Association

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# Idaho Wool Growers Association

Organized September 1893, At Mountain Home, Idaho

## OFFICERS

John Peterson  
President  
Emmett

Jack Blattner  
Vice President  
Kuna

Liz Wilder  
Executive Director  
Caldwell

July 19, 2023

Idaho Department of Lands  
Attn: Todd Wernex – Rulemaking  
P.O. Box 83720  
Boise, Idaho 83720-0050  
*Submitted via email to rulemaking@idl.idaho.gov*

RE: DOCKET: 20-0501-2301

Mr. Wernex,

## DIRECTORS

Frank Shirts  
Western District

J.C. Siddoway  
Eastern District

Mark Henslee  
Central District

Sheila Hasselstrom  
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 industry in Idaho is tallied at approximately 220,000 animals with a significant portion of those animals grazing on public land. The IWGA supported S1049 and through these comments is supportive of the proposed rule with several modifications as detailed herein.

IWGA members have felt increased recreational use on public lands, especially since the inception of COVID. This has resulted in more stolen property and damaged property. IWGA members treasure the opportunity to graze on Idaho's public lands, but a damaged fence, gate, or corral can wreak havoc on an operator's band of sheep.

## DIRECTORS

### AT LARGE

Blake Ball

Forrest Arthur

Carol Finney

This rule will give IDL more tools in the toolbox to actively manage the land. Attached are several suggested redline edits to the current rule that IWGA believes would add clarity and consistency. These suggestions include adding livestock movement to 020.03(f) so as prevent livestock from freely moving down a trail or road. Obstructions will occur, but if a person is intentionally moving the livestock in the wrong direction it can be a significant detriment. Additionally, IWGA would encourage either the word "corral" or "livestock handling equipment" to be added to 020.03 (Gates and Fences). This would clear any confusion if a recreator or user of endowment land parked a vehicle in front of a corral or damaged a corral or any other livestock handling equipment located on public lands.

We feel that the rules are a strong start, but the suggested comments would add clarity to prevent ambiguities.

Thank you,

John Peterson  
President

Liz Wilder  
Executive Director