Data Submitted (UTC 11): 4/16/2021 11:00:00 AM
First name: Tina
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Organization: Coalition for Livestock Guardian Dogs
Title: Founding Director
Comments: Letter and supporting documentation attached. Thank you.

We would like to give some very important and much needed input regarding the use of livestock guardian dogs (LGD) on public lands. Since the introduction of LGD in the 1970s, they have gone without any oversight. While it's understood that they are an excellent tool in providing nonlethal predator management, many LGD continue to be mismanaged. According to the American Sheep Industry (ASI) , [ldquo]Based upon recent events, ASI strongly believes that the use of LPDs on federal grazing allotments is in serious jeopardy and anticipates three possible outcomes: 1) Federal land management agencies develop their own mandatory regulations for the use of LPDs on grazing allotments; 2) Federal land management agencies eliminate the use of LPDs on grazing allotments; or 3) ASI adopts an LPD program that recommends standards for the use of LPDs with the intent to maintain the use of LPDs on federal grazing allotments.[rdquo] Given that these recommendations have never been addressed, we are advocating that the following requirements are incorporated into Chapter 10, Section 12, Eligibility and Qualification Requirements for Term Grazing Permits. The proposed guidelines are taken directly from the ASI recommendations (see attached), for LGD used on public lands and should be tied to the grazing permit to ensure accountability.

1) Each livestock guardian dog should carry one of the following types of identification: collar and ID tag, microchip, tattoo or ear tag.

2) Each livestock guardian dog should:

[bull] be vaccinated for rabies

[bull] be vaccinated for distemper, hepatitis, parvo and leptospirosis combo

[bull] be dewormed for canine-specific internal parasites

[bull] be dewormed for Ovine Cysticercosis

[bull] be surgically sterilized by a licensed veterinarian

[bull] carry one of the following types of identification: collar and ID tag, microchip or tattoo

3) Livestock guardian dogs will NOT be permitted to be used if they:

[bull] have not been vaccinated, dewormed and sterilized as defined above

[bull] stray beyond an area from which they can protect sheep

[bull] they do not respond to the NO command to stop undesirable behavior such as chasing a vehicle or aggressively approaching a stranger.

[bull] they cannot be caught

[bull] they are not social enough to help them recognize that typically people do not pose a threat to the sheep.

[bull] they show hyper-aggressive behavior towards people or other restrained dogs

4) Herders should:

[bull] be provided with LGD brochures and information cards that list the livestock owner[rsquo]s name and contact information that can be distributed to the general public and others who may come into contact with the sheep and LGDs.

[bull] know where the rabies vaccination certificates, sterilization certificates and proof of DHLPP vaccination and deworming are located and should be prepared to share those with appropriate governmental officials/law enforcement if requested.

[bull] ensure that trailheads are posted with appropriate LPD information signs when flocks are in the vicinity and contact is likely.

Every year, countless numbers of neglected, injured, emaciated, abandoned and culled livestock guardian dogs are found on public lands. Many, if not all, incidents can be prevented by implementing the recommendations created by ASI and encouraged by our organization. Implementation would improve public safety and increase protection of livestock.

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