



American Lamb Council



American Sheep Industry Association, Inc.
www.sheepusa.org



American Wool Council

July 20, 2010

Mr. Edwin L. Roberson
Assistant Director
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Mr. Roberson:

On behalf of the American Sheep Industry Association (ASI) and the state sheep producer associations that have been active with our working group on Livestock Protection Dogs, we appreciate the continued interest of the Bureau of Land Management (BLM) in working with us on this topic.

The working group and the ASI Executive Board met separately in July and each fully agreed with three priorities as discussed with officials of the agency this summer regarding livestock protection dogs.

Coordination with permittees on sheep grazing allotments with notification of permitted or planned recreational events is absolutely critical to avoid conflicts between recreationalists and livestock protection dogs.

Secondly, the groups strongly support the promotion of signage alerting the public of livestock protection dogs and educational outreach programs to recreationalists. We see increased signage on allotments today and believe there is considerable demand for more. Our working group has been coordinating with USDA APHIS Wildlife Services on federal research and management information and is pleased to report that the program has final approval for an educational brochure and portable signs. The program expects to have several thousand brochures and five hundred signs available from the printer shortly. We appreciate that BLM consulted ASI in the process of devising the information and we look forward to the availability of the brochures and signs.

Third, it should be recommended that records of rabies vaccinations be maintained preferably with the herder on the allotment so they are available in the case of incidents with the protection dogs. Also, contact information for the owner of the sheep should be readily available by the herder.

We appreciate your correspondence of Feb. 24, 2010, that BLM is coordinating with the U.S. Forest Service for similarities in policy on livestock protection dogs.

We found it very interesting over the course of the past year of the working group meetings, conference calls and two rounds of sheep industry input on management guidance that successful management of the dogs for effective predator control and avoidance of conflicts depends greatly on the species of predators involved. Additionally, protection dog management on heavily recreated areas is more intensive than what is needed for most sheep grazing on public or private lands.

Dog management in bear and lion country differs from the areas where coyotes are the primary predator. Management and breeding of dogs used in wolf areas was entirely different again.

We received feedback and guidance on practices, breeding, dog handling, bonding of dogs to sheep, degree of human interaction and effectiveness of predator deterrence. While initially we thought a management outline would be helpful to sheep producers, we determined that most prescriptive type practices did not allow for effective predator control across all allotments or we found that the practices failed to prove they would prevent conflicts with recreationalists.

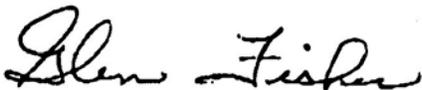
Permittees have had success in predation management with dogs using a broad range of practices and what works on one ranch is a waste of time on another. Conversely, the input we gathered reflected that the answer to conflict avoidance does not alone lie with dog breeding.

In 2010, we intend to finish a basic set of practices and tips on the management of protection dogs to share with all sheep producers and permittees to enhance dog management and intent to have a commitment from USDA APHIS Wildlife Services to continue the development of education based on the research they have conducted. Additionally, we are interviewing sheep producers this summer and posting their insights on dog management and predator control on the ASI website. We plan to include interviews with producers that graze heavy recreational areas as well as interviews from those where allotments are seldom used for recreation, which is a much more frequent situation.

Producer education, combined with public education and the coordination of notices to permittees of recreational events, is very supportive of our shared goals to avoid predator losses and conflicts with recreationalists.

The coordination between range and recreational departments in areas with livestock protection dogs will be very helpful.

Sincerely,

A handwritten signature in cursive script that reads "Glen Fisher".

Glen Fisher, President

C: Rob Roudabush
Robert Bolton
Kimberly Hackett
Barry Imler