

Agenda Item 05 - Written Public Comments

Item	Name	Topic	Date Received
Item 01	Zoë Hanley	Resolution 298	01/12/2021
Item 02	Amorita Maher	Resolution 298	01/12/2021
Item 03	Matt Battilega	Resolution 298	01/12/2021
Item 04	Jeanette Yturriondobeitia	Resolution 298	01/13/2021
Item 05	Katie Murray	Resolution 024	01/14/2021
Item 06	Ryan McCarthy	Resolution 298	01/14/2021
Item 07	Sharon Waterman	Resolution 298	01/14/2021
Item 08	Kelly Peterson	Resolution 298	01/14/2021
Item 09	Mary Anne Cooper, OFB Tammy Dennee, OCA	Resolution 298	01/14/2021
Item 10	Amaroq Weiss	Resolution 298	01/14/2021
Item 11	Mary Anne Cooper, OFB Samantha Bayer, OFB	Resolution 024 Resolution 203 Resolution 274 Resolution 169 Resolution 266 Resolution 314 Resolution 315 Resolution 316	01/14/2021
Item 12	Gail Greenman, OFB	Resolution 317	01/14/2021
Item 13	Matthew Brady	Resolution 298	01/14/2021

Board of Agriculture Resolutions under current review:

- 024 – Pesticide Use for Insect Pest and Disease Control
- 169 – Need for Documented Agricultural Work Force
- 203 – Soil and Water Conservation Cost Share Funds
- 266 – Collective Bargaining for Agricultural Workers and Employers
- 274 – Board of Agriculture and the Department of Agriculture Involvement in the Oregon Watershed Enhancement Board
- 298 – Coexistence of wolves and livestock on Oregon’s rural landscape
- 314 – Permitted uses on lands zoned exclusive farm use and on high-value farmland agricultural land
- 315 – Working Lands Conservation Easements
- 316 – Federal Minimum Wage Parity
- 317 – Oregon Department of Agriculture’s role in the Food Safety Modernization Act Produce Rule Implementation

From: Zoe Hanley zhanley@defenders.org 
Subject: BOA Public Comment January 2021
Date: January 12, 2021 at 1:48 PM
To: kvalness@oda.state.or.us



Greetings Ms. Valness,

Please see the attached comment letter containing language suggestions for Resolution 298. We sincerely appreciate the opportunity to comment and thank the Board for their consideration.

Kind regards,



Zoë Hanley

Northwest Representative

[DEFENDERS OF WILDLIFE](#)

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January 12, 2021

Karla Valness
Special Assistant to the Director
Oregon Department of Agriculture
Salem Office
635 Capitol St NE
Salem, OR 97301-2532

Comments submitted electronically to kvalness@oda.state.or.us

Dear Ms. Valness,

Thank you for the opportunity to provide comments for resolutions under review by the Oregon State Board of Agriculture (OSBA). Defenders of Wildlife (Defenders) is a national wildlife conservation organization that aims to protect imperiled and native species and their habitats. In the Pacific Northwest, we operate in Oregon and Washington. Through this public comment letter, Defenders would like to offer a re-framing and language recommendations for Resolution 298 entitled *Coexistence of wolves and livestock on Oregon's rural landscape*.

Resolution 298 currently states that OSBA “supports, recommends, and encourages the implementation of plain, certain, and science-based rules...that are necessary to address livestock predation by wolves in Oregon...”. As a science-based organization Defenders agrees with the above statement but does not believe the following statement exemplifies this science-based ethos: “...that authorize Oregon’s livestock producers and their agents to use immediate lethal control when necessary to prevent livestock predation by wolves or those in the process of or attempting to kill any livestock according to the Oregon Wolf Conservation Management Plan.” We find this statement particularly inconsistent with prevailing science and scientific evidence.

Wolf-livestock coexistence research from Idaho, Montana and global studies indicate that lethal control is not the most effective means of reducing livestock depredation by wolves long-term (Bradley et al., 2015; Bruns et al., 2020; Eklund et al., 2017; van Eeden et al., 2018) and can increase depredations for the affected or neighboring livestock producers in the short-term (Santiago-Avila et al., 2018). In addition, wolves disperse long distances and will recolonize areas with suitable habitat leading to a never-ending cycle of wolf killing if effective preventative measures are not implemented.

The term “coexistence” is in this resolution’s title, therefore, we urge the Department of Agriculture to set the right narrative in promoting this philosophy. Coexistence between humans and wildlife is the ability to share a landscape and minimize negative interactions through proactive measures. Non-lethal preventative measures have been shown to decrease livestock losses to wolves more effectively than lethal control long-



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term (Bruns et al., 2020; Khorozyan and Waltert, 2019; Lance et al., 2010; Rigg et al., 2011) and offer an opportunity for both wolves and rural communities to thrive on shared landscapes. We recommend OSBA amend Resolution 298 to state: "...The Oregon State Board of Agriculture supports, recommends, and encourages the implementation of plain, certain, and science-based rules; consistent policy, procedures, and standards that are necessary to address livestock predation by wolves in Oregon ~~and, in particular,~~ *including non-lethal preventative measures and those that authorize Oregon's livestock producers and their agents to use immediate lethal control when necessary to prevent livestock predation by wolves or those in the process of or attempting to kill any livestock according to the Oregon Wolf Conservation and Management Plan.*"

We strongly feel that setting a tone of lethal control as the most important tool does not empower livestock producers to effectively reduce wolf-livestock conflicts before they occur. We hope that OSBA sees value in equipping ranching families with the right tools and information on proactive (rather than reactive) measures that will set them for success as rural communities continue to live with wolves and other carnivores.

Thank you for the opportunity to provide comment. We hope you consider our recommendations as these resolutions set the narrative and the stage for livestock producers and wolves to thrive on Oregon's diverse landscape.

Sincerely,

Zoë Hanley, PhD
Representative, Northwest Program
Defenders of Wildlife
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Sristi Kamal, PhD
Senior Representative, Northwest Program
Defenders of Wildlife
skamal@defenders.org





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References

- Bradley, E.H., Robinson, H.S., Bangs, E.E., Kunkel, K., Jimenez, M.D., Gude, J.A., Grimm, T., 2015. Effects of wolf removal on livestock depredation recurrence and wolf recovery in Montana, Idaho, and Wyoming. *J. Wildl. Manage.* 78, 1337–1346. <https://doi.org/10.1002/jwmg.948>
- Bruns, A., Waltert, M., Khorozyan, I., 2020. The effectiveness of livestock protection measures against wolves (*Canis lupus*) and implications for their co-existence with humans. *Glob. Ecol. Conserv.* 21, e00868. <https://doi.org/10.1016/j.gecco.2019.e00868>
- Eklund, A., López-Bao, J.V., Tourani, M., Chapron, G., Frank, J., 2017. Limited evidence on the effectiveness of interventions to reduce livestock predation by large carnivores. *Sci. Rep.* 7, 10.1038/s41598-017-02323-w. <https://doi.org/10.1038/s41598-017-02323-w>
- Khorozyan, I., Waltert, M., 2019. A framework of most effective practices in protecting human assets from predators. *Hum. Dimens. Wildl.* 24, 380–394. <https://doi.org/10.1080/10871209.2019.1619883>
- Lance, N.J., Breck, S.W., Sime, C., Callahan, P., Shivik, J.A., 2010. Biological, technical, and social aspects of applying electrified fladry for livestock protection from wolves (*Canis lupus*). *Wildl. Res.* 37, 708–714. <https://doi.org/10.1071/WR10022>
- Rigg, R., Findo, S., Wechselberger, M., Gorman, M.L., Sillero-Zubiri, C., MacDonald, D.W., 2011. Mitigating carnivore-livestock conflict in Europe: Lessons from Slovakia. *Oryx* 45, 272–280. <https://doi.org/10.1017/S0030605310000074>
- Santiago-Avila, F.J., Cornman, A.M., Treves, A., 2018. Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *PLoS One* 13, 1–20. <https://doi.org/10.1371/journal.pone.0189729>
- van Eeden, L.M., Crowther, M.S., Dickman, C.R., Macdonald, D.W., Ripple, W.J., Ritchie, E.G., Newsome, T.M., 2018. Managing conflict between large carnivores and livestock. *Conserv. Biol.* 32, 26–34. <https://doi.org/10.1111/cobi.12959>

From: amorita maher amoritamaher@yahoo.com  
Subject: Oregon Wolf Conservation and Management Plan
Date: January 12, 2021 at 1:56 PM
To: kvalness@oda.state.or.us

AM

Karla,

I am attaching a response to information we received concerning present Oregon Wolf Conservation and Management Plan.

Amorita Maher

January 12, 2021

Department of Agriculture,

It appears that the reintroduction of wolves in our state has been extremely successful. Although the brunt of the expense to reintroduce wolves has been born by all taxpayers, the expense and headache of managing them has fallen on individual ranchers.

Wolves must be treated as any other predator in the state. We are particularly concerned that the Oregon Wolf Conservation and Management Plan focus on the authorized take of problem wolves in all phases and areas. Equally important, is that there be local staff qualified to determine depredations.

Now more than ever, it is crucial to be able to obtain a hasty removal of problem predators. Providing tools and procedures at the local level is the key.

I request the board update their resolution to advocate for changes to the Oregon Wolf Conservation and Management Plan that will help normalize management of wolves with other predators, give landowners the tools they need to co-exist with wolves and support adequate compensation for ranchers who experience wolf depredation.

Sincerely,

Steve and Amorita Maher, Maher Ranch

From: Matt Battilega mattbattilega@gmail.com
Subject: Livestock and Wolves Resolution
Date: January 12, 2021 at 2:11 PM
To: Staff Karla Valness kvalness@oda.state.or.us



Dear Staff Valness,

We need active management of wolf please.

Sincerely,

Matt Battilega
16370 NE Eilers Rd
Aurora, OR 97002
mattbattilega@gmail.com

From: Jeanette Yturriondobeitia ayarsytu2riondobeitia@gmail.com
Subject: Coexistence between livestock and wolves
Date: January 13, 2021 at 8:48 AM
To: kvalness@oda.state.or.us



12 Mile Ranch, Malheur County

Wolf reintroduction in the state has been overwhelmingly successful, with the numbers of wolves growing significantly year to year. However, the impact of wolf reintroduction has been born exclusively by ranchers. We have been left without the necessary tools to co-exist and manage wolves that kill or injure our livestock.

We have not had actual wolf sighting activity in our area. However, on reading the studies done on the psychic to cattle by wolves, we are very concerned when our cattle act strangely. The psychic of both cattle and wolves is glorious. There are plenty of all species of wolves on the world. To choose to introduce wolves in the least populated areas of the United States was to appease the NGO activists that want cattle removed from lands only good enough for grazing. Now we are left with an overpopulated, unregulated wolf population.

The current resolution correctly recognizes many of the challenges and costs associated with wolf reintroduction in Oregon, and correctly advocates for the tools that ranchers need to help coexist with wolves. I support the existing language, and recommend adding a section supporting changes to the Oregon Wolf Conservation and Management Plan to help ensure ranchers have the tools they need to manage wolf conflicts.

The State of Oregon must normalize wolf management and treat wolves as they treat other predators in the state. We need changes to the Oregon Wolf Conservation and Management Plan to require increased management of wolf populations through collaring and wolf management zones, authorize take of problem wolves in all phases, and allow for qualified local determinations of depredations.

These changes would begin to give ranchers the tools they need to coexist with wolves while protecting their livestock from repeated depredation. These changes were not adopted in the last update to the Plan. I request that the Board update their resolution to advocate for changes to the Oregon Wolf Conservation and Management Plan the normalize management of wolves with other predators, give landowners the tools they need to co-exist with wolves, and support adequate compensation for ranchers who experience wolf depredation.

Sincerely,
Jeanette Yturriondobeitia



OREGONIANS FOR FOOD & SHELTER

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January 13th 2021

Oregon State Board of Agriculture:

Please accept the following comments on proposed resolution 024: relating to pesticide use for insect pest and disease control.

Pesticides are widely recognized as a necessary component of integrated pest management approaches. Please do not shy away from acknowledging what we know to be true based on current pest management science: that pesticides, when used safely and judiciously as part of an integrated approach, are effective and necessary crop protection tools.

Further, "other acceptable methods" leaves too much open to interpretation. Broadly, crop protection tools need to be safe, effective, and economically viable. Many pesticides meet all of three these descriptions, and therefore should not be considered a stand-in pending the discovery of alternative methods.

Finally, the proposed language seems misaligned with ODA's recent ruling to limit and eventually phase out most uses of chlorpyrifos, which took place despite the fact that for most of Oregon's uses, safe, effective, and economically viable alternatives have not yet been developed.

Therefore, we propose the following change:

"The State Board of Agriculture supports the need of agriculture to control insect pests and diseases using pesticide chemicals ~~until other acceptable methods are developed~~ as part of an integrated approach to pest management.

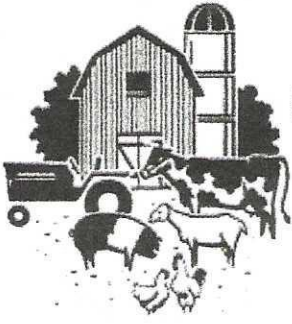
The State Board of Agriculture adopts the position that when pesticides used in agriculture are applied in accordance with pesticide label, then the public and the environment are protected from harmful or adverse effects as required by federal law."

Sincerely,

Katie Murray
Executive Director
Oregonians for Food & Shelter (OFS)
katiemurray@ofsonline.org
541.231.1983

OFS STAFF

Katie Murray, Executive Director; katiemurray@ofsonline.org
Angi Bailey, Grassroots Coordinator; angi@ofsonline.org
Diann Washburn, Office Manager; diann@ofsonline.org



Coos-Curry County Farm Bureau

87518 Davis Creek Lane, Bandon, Oregon 97411

January 14, 2021

Oregon Board of Agriculture:

The Coos-Curry County Farm Bureau supports the language in your existing resolution regarding coexistence between livestock and wolves in Oregon. However, we would like to recommend adding sections supporting changes to the Oregon Wolf Conservation and Management Plan (Wolf Plan) to ensure ranchers have the tools to manage wolf conflicts.

Members of our Coos-Curry County Farm Bureau unfortunately have had livestock losses due to a probable wolf which later was determined an actual wolf when it killed many more sheep on another producer's land. It is concerning when nothing can be done immediately to remove individual wolves that target livestock. It is even more concerning when wolf paw prints are noted on the public beaches. Potential wolf sightings are quite concerning to landowners as well as livestock producers. The safety of the public as well as livestock must be a priority.

Wolf reintroduction has been successful in Oregon, but the ranchers have borne exclusively the impact of this growing population. Unfortunately, ranchers are not provided the necessary tools to co-exist and manage wolves that kill and injure livestock. The agencies cannot even come to an agreement if it is or isn't a wolf. For the ranchers who deal with depredation of livestock, the determination is very clear based on the science of killing.

The State of Oregon must realize that wolves are predators. There needs to be changes in the "Wolf Plan" to require increased management of wolves with collaring, authorized takes for problem wolves, local determinations, etc. Changes in the "Wolf Plan" will give ranchers the tools they need to coexist with wolves while protecting their livestock from repeated depredation.

The Coos-Curry County Farm Bureau request the Oregon Board of Agriculture move forward with an edited resolution that includes changes in the Oregon Wolf Conservation and Management Plan as discussed.

Thank you for the opportunity to comment on this issue.

Respectfully,

A handwritten signature in black ink, appearing to read "Ryan McCarthy", with a long horizontal line extending to the right.

Ryan McCarthy, President

From: watermanranch@frontier.com
Subject: Wolf Resolution Comments
Date: January 14, 2021 at 10:47 AM
To: kvalness@oda.state.or.us



As a rancher in southern coastal Oregon, we request the Oregon Board of Agriculture review and consider edits on the existing resolution concerning coexistence between livestock and wolves.

Around three years ago, a neighboring livestock producer lost a substantial number of their ewe lambs to predation. The agencies were called in to determine if it was done by a wolf and could not agree on a determination. At a wolf workshop in Medford, a picture of paw prints of the wolf on the beach adjacent to this producer, was presented to the attendees. Who knows how many other lambs/sheep were killed before the wolf took out lambs on another ranch on the hill. The agencies determined those kills as wolf. As a sheep producer at that time, we had grave concerns for the economics of our operation. We knew there was a wolf in our area and we knew we basically couldn't do anything to remove the problem animal.

The reality is, there needs to be an easy process to remove wolves that cause such depredation. Wolves need to be collared so there is good tracking of the animal. The local USDA Wildlife Services staff need to make the determination based on the science of wolf killing rather than people who really don't know the ins and outs of local predators. The State of Oregon needs to realize wolves are a predator and the Oregon Wolf Conservation and Management Plan needs to include adequate tools for the ranching community to remove bad actors (wolves). Having a wolf on the beach creates a public safety issue.

Thank you for the opportunity to comment on this very important issue. We sincerely hope the Board of Agriculture will support edits to the existing resolution to allow for better processes to protect livestock and the community from wolves.

Respectively,

Sharon Waterman



**THE HUMANE SOCIETY
OF THE UNITED STATES**

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January 14, 2021
Barbara Boyer, Chair
Oregon Board of Agriculture
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Salem, OR 97301

Submitted via email: kvalness@oda.state.or.us

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RE: Coexistence of wolves and livestock on Oregon's rural landscape resolution

Dear Chairperson Boyer and Members of the Board:

On behalf of the Humane Society of the United States and our supporters in Oregon, I submit the following comments regarding the Oregon Board of Agriculture ("Board") Coexistence of wolves and livestock on Oregon's rural landscape resolution (Resolution 298). The current resolution is not supported by the best available science, which shows that killing wolves (*Canis lupus*) will not reduce already rare conflicts with livestock. In fact, recent research suggests that lethal control can actually increase conflicts by disrupting the stable familial social structures of wolves.

The resolution states that the Board supports, recommends, and encourages rules that "authorize Oregon's livestock producers and their agents to use immediate lethal control when necessary to prevent livestock predation by wolves or those in the process of attempting to kill any livestock according to the Oregon Wolf Conservation and Management Plan." However, this language is misguided as it 1) fails to recognize that conflicts between wolves and livestock in Oregon are already very rare, and 2) ignores the substantial body of scientific study demonstrating that indiscriminate killing of wolves will do little to reduce conflicts with livestock.

For the reasons that follow, I urge the Board to withdraw this resolution, as it is not based on accurate or scientifically sound information.

Killing wolves will not reduce already rare conflicts with livestock

In the United States, data show that wolves kill few cattle and sheep. While livestock predation data collected by various governmental bodies differ significantly due to differences in methodology, the most recent data published by the U.S. Department of Agriculture-Animal and Plant Health Inspection Service (USDA) show that the largest sources of mortality for Oregon's livestock, such as disease, birthing problems, and weather, cause many times



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more losses compared to losses from wolves (83% and 2%, respectively).ⁱ More recently, according to the Oregon Department of Fish and Wildlife, there were just 16 confirmed and 1 probable wolf depredations in 2019, representing the loss of a mere 0.001% of Oregon's 1.32 million cattle and calf inventory.ⁱⁱ

While I recognize that the loss of even one livestock animal is a serious concern, the best available science demonstrates that indiscriminately killing wolves through lethal predator control does not improve livestock safety and likely exacerbates these already low instances of conflict with livestock.ⁱⁱⁱ For example, wildlife biologists reviewed a 17-year data set that involved Michigan wolves and livestock losses. They discovered that the lethal removal of wolves for livestock protection reasons on one farm increased future wolf predation on their neighbors' livestock.^{iv} Studies show that the random killing of wolves (predator control) by government officials or individuals does little to protect livestock.^v Similarly, a 2018 Montana study also indicated that the trophy hunting of wolves does little-to-nothing to protect livestock.^{vi} Most predator control kills wolves randomly and fails to prevent livestock losses but is overly lethal to wolves.^{vii}

According to Bergstrom (2017):

There are 3 reasons that predator removal is likely to have no long-term effect—or even adverse effects—on depredation of livestock: vacant territories are quickly recolonized (Knowlton et al. 1999; Treves and Naughton-Treves 2005); immigration rate of breeding pairs into the area experiencing lethal control can increase (Sacks et al. 1999); and immigrants are more likely to be subadults, which have a greater propensity for livestock depredation than older adults (Peebles et al. 2013).^{viii}

Non-lethal methods to protect cattle and sheep are more effective at preventing conflicts

Not only are livestock losses to wolves rare and far less lethal to livestock than health, weather, and birthing problems,^{ix} but many studies (including those mentioned above) have called into question whether or not lethal predator control programs reduce conflicts between wolves and livestock.^x Non-lethal methods to protect livestock and *prevent* conflicts from happening in the first place are more effective, economical, and humane than killing wolves. New studies show that the best solutions for protecting cattle, sheep, and other domestic animals come from non-lethal measures, such as sanitary carcass removal, fladry and or turbo fladry, synchronizing birthing seasons with native ungulates, changing livestock types or breeds, spotlights, airhorns, guard animals, range riders, electric fencing and Foxlights™.^{xi}

In a seven-year study of open-range sheep in neighboring Idaho, in an area where a variety of non-lethal deterrents were used (including human herders or “range riders”), sheep losses were the lowest in the state. Whereas in the nearby study's control area, where wolves are routinely killed, sheep losses were 3.5 times higher, demonstrating that non-lethal deterrents were far more effective than lethal ones.^{xii} A number of other scientific reviews have questioned the scientific merit and efficacy of lethal predator control.^{xiii} In their review, Treves et al. (2016)



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strongly suggest that all lethal predator controls be suspended until “gold standard” reviews of the efficacy of some predator control methods are completed. Similarly, Lennox et al. (2018) also recommend against the expensive, broad scale killing of native carnivores.

For these reasons, I urge the Board to withdraw the Resolution, as it is based on common misperceptions that have been called into question by recent scholarship. Thank you for your consideration.

Sincerely,

Kelly Peterson
Oregon Senior State Director
The Humane Society of the United States

ⁱ U.S. Department of Agriculture-APHIS. (2017). “Death Loss in U.S. Cattle and Calves Due to Predator and Nonpredator Causes, 2015,”

https://www.aphis.usda.gov/animal_health/nahms/general/downloads/cattle_calves_deathloss_2015.pdf. U.S. Department of Agriculture-APHIS. (2015). “Sheep and Lamb Predator and Non-Predator Death Loss in the United States,” https://www.aphis.usda.gov/animal_health/nahms/sheep/downloads/sheepdeath/SheepDeathLoss2015.pdf.

ⁱⁱ Oregon Department of Fish and Wildlife. 2020. Oregon Wolf Conservation and Management 2019 Annual Report. Oregon Department of Fish and Wildlife, 4034 Fairview Industrial Drive SE. Salem, OR, 97302; United States Department of Agriculture- National Agricultural Statistics Service- Northwest Regional Field Office. 2019. 2019 Oregon Annual Statistical Bulletin. Retrieved from <https://www.oregon.gov/oda/shared/Documents/Publications/Administration/AgStatsDirectory.pdf>

ⁱⁱⁱ Creel, S., & Rotella, J. (2010). Meta-analysis of relationships between human offtake, total mortality and population dynamics of gray wolves (*Canis lupus*). *PLOS ONE*, 5(9). Creel, S., Becker, M., Christianson, D., Droge, E., Hammerschlag, N., Hayward, M. W., ...Schuette, P. (2015). Questionable policy for large carnivore hunting. *Science*, 350(6267), 1473-75. Haber, G. C. (1996). Biological, conservation, and ethical implications of exploiting and controlling wolves. *Conservation Biology*, 10(4), 1068-81. Santiago-Avila, F. J., Cornman, A. M., & Treves, A. (2018). Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *PLOS ONE* 13(1), e0189729.

^{iv} Santiago-Avila, Cornman, and Treves, “Killing Wolves to Prevent Predation on Livestock May Protect One Farm but Harm Neighbors.”

^v Adrian Treves, Miha Krofel, and Jeannine McManus, “Predator Control Should Not Be a Shot in the Dark,” *Frontiers in Ecology and the Environment* 14, no. 7 (2016).

^{vi} Nicholas. J. DeCesare et al., “Wolf-Livestock Conflict and the Effects of Wolf Management,” 82, no. 4 (2018).

^{vii} A. Eklund et al., “Limited Evidence on the Effectiveness of Interventions to Reduce Livestock Predation by Large Carnivores,” *Scientific Reports* 7 (2017); Treves, Krofel, and McManus, “Predator Control Should Not Be a Shot in the Dark.”; Lennox et al., “Evaluating the Efficacy of Predator Removal in a Conflict-Prone World.”; B. J. Bergstrom, “Carnivore Conservation: Shifting the Paradigm from Control to Coexistence,” *Journal of Mammalogy* 98, no. 1 (2017).

^{viii} Bergstrom, B. J. (2017). Carnivore conservation: Shifting the paradigm to coexistence. *Journal of Mammalogy*, 98(1): 1-6.

^{ix} Id.



^x B. J. Bergstrom, "Carnivore Conservation: Shifting the Paradigm from Control to Coexistence," *Journal of Mammalogy* 98, no. 1 (2017); Adrian Treves, Miha Krofel, and Jeannine McManus, "Predator Control Should Not Be a Shot in the Dark," *Frontiers in Ecology and the Environment* 14, no. 7 (2016); Francisco J. Santiago-Avila, Ari M. Cornman, and Adrian Treves, "Killing Wolves to Prevent Predation on Livestock May Protect One Farm but Harm Neighbors," *PLOS ONE* 13, no. 1 (2018); A. Eklund et al., "Limited Evidence on the Effectiveness of Interventions to Reduce Livestock Predation by Large Carnivores," *Scientific Reports* 7 (2017); Robert J. Lennox et al., "Evaluating the Efficacy of Predator Removal in a Conflict-Prone World," *Biological Conservation* 224 (2018).

^{xi} William F. Andelt, "Carnivores," in *Rangeland Wildlife*, ed. P. R. Krausman (Denver: Society for Range Management, 1996); A. Treves and K. U. Karanth, "Human-Carnivore Conflict and Perspectives on Carnivore Management Worldwide," *Conservation Biology* 17, no. 6 (2003); Eklund et al., "Limited Evidence on the Effectiveness of Interventions to Reduce Livestock Predation by Large Carnivores."; S. A. Stone et al., "Adaptive Use of Nonlethal Strategies for Minimizing Wolf-Sheep Conflict in Idaho," *Journal of Mammalogy* 98, no. 1 (2017); M. Parks and T. Messmer, "Participant Perceptions of Range Rider Programs Operating to Mitigate Wolf-Livestock Conflicts in the Western United States," *Wildlife Society Bulletin* 40, no. 3 (2016).

^{xii} S. A. Stone et al., "Adaptive Use of Nonlethal Strategies for Minimizing Wolf-Sheep Conflict in Idaho," *Journal of Mammalogy* 98, no. 1 (Feb 2017), <http://dx.doi.org/10.1093/jmammal/gyw188>

^{xiii} See e.g.: Eklund, A., Lopez-Bao, J. V., Tourani, M., Chapron, G., & Frank, J. (2017). Limited evidence on the effectiveness of interventions to reduce livestock predation by large carnivores. *Scientific Reports*, 7. Lennox, R. J., Gallagher, A. J., Ritchie, E. G., & Cooke, S. J. (2018). Evaluating the efficacy of predator removal in a conflict-prone world. *Biological Conservation*, 224, 277-89. Treves, A., M. Krofel, and J. McManus. 2016. Predator control should not be a shot in the dark. *Frontiers in Ecology and the Environment* 14:380-388.



To: Board of Agriculture
From: Mary Anne Cooper, Oregon Farm Bureau
Tammy Dennee, Oregon Cattlemen's Association
Date: January 14, 2021

RE: Comments on Resolution 298 "Coexistence of wolves and livestock on Oregon's Rural Landscape."

We appreciate the Board of Agriculture's existing Resolution 298 regarding "Coexistence of wolves and livestock on Oregon's Rural Landscape." As drafted, it correctly recognizes the many challenges of wolf reintroduction on Oregon's livestock producers, and the need for producers to have tools available to manage conflicts with wolves. Our organizations represent the state's cattle and other livestock producers. We have been engaged in the Oregon Department of Fish and Wildlife (ODFW)'s management of wolves since the first Oregon Wolf Conservation and Management Plan was created, and were heavily engaged in the 2019 update of the Plan. Since 2008, we have been working to educate our producers and the public about the laws governing wolf management and the need to manage wolves concurrently with all other predators in the state.

The data is clear that the Oregon Wolf Conservation and Management Plan has been successful in achieving recovery and supporting a viable population of wolves in the state. We know this because wolf populations in Oregon have increased exponentially since the first wolves came into the state a little over a decade ago, going from one wolf in 2008 to over 137 wolves in 2018. And these are minimum numbers, with the actual number of wolves likely exceeding this count significantly. Wolves also now occupy a statewide range, with dispersal occurring from Northeastern Oregon to the Oregon coast. Oregon's trend follows the trend west wide. There are now more than 5,000 gray wolves in the United States, and more than ten times that number in Canada. Indeed, wolf recovery has been such a significant success story that the United States Fish and Wildlife Service recently federally delisted the gray wolf and returned management of the wolf to the state. In doing so, this administration was the third administration in a row to recognize wolf recovery and work to delist wolves. This is good news for Oregon - Oregon's Wolf Conservation and Management Plan has demonstrated that federal delisting is not misplaced, and that Oregon's plan is capable of protecting and promoting wolf populations within our borders.

However, the impact of wolf reintroduction has been born exclusively by ranchers. Oregon's ranchers have been left without the necessary tools to co-exist and manage wolves that kill or injure our livestock. The current resolution correctly recognizes many of the challenges and costs associated with wolf reintroduction in Oregon, and correctly advocates for the tools that ranchers need to help coexist with wolves. We have long

advocated for the State of Oregon to normalize wolf management and treat wolves as they treat other predators in the state. Our organizations have also requested changes to the Oregon Wolf Conservation and Management Plan to require increased management of wolf populations through collaring and wolf management zones, authorize take of problem wolves in all phases, and allow for qualified local determinations of depredations. These changes would begin to give ranchers the tools they need to coexist with wolves while protecting their livestock from repeated depredation, and we will continue to advocate for them through the ODFW Plan review process. Furthermore, we are advocating for increased resources in the compensation fund for ranchers who face depredation losses or who need assistance with nonlethal measures.

We appreciate the recognition of the challenges with wolf reintroduction, the need for financial assistance for landowners who experience loss and seek to implement non-lethal measures, and the recognition of the unresolved concerns of livestock producers regarding wolf recovery and management in Oregon in the current resolution language. We urge the Board to re-adopt the existing resolution without changes.

Delivered Electronically

January 14, 2021

Karla Valness
Special Assistant to the Director
Oregon Department of Agriculture
Salem office
635 Capitol St NE
Salem, OR 97301-2532
Kvalness@oda.state.or.us

RE: Comments Regarding ODA Resolution 298: Coexistence of Wolves and Livestock on Oregon's Rural Landscape

Dear Ms. Valness,

We appreciate the opportunity to comment on resolutions under consideration by the Oregon State Board of Agriculture. The following comments regard *Resolution 298: Coexistence of Wolves and Livestock on Oregon's Rural Landscape*. These comments are submitted to you by the Center for Biological Diversity, Oregon Wild, Cascadia Wildlands and WildEarth Guardians. All of our organizations have offices and staff in Oregon and a decades'-long history of work on wolf conservation issues. In combination, we represent more than 66,450 members and supporters who are residents of Oregon and our comments are submitted on their behalf.

The Resolution as currently written contains some language where our view aligns with the Oregon Department of Agriculture's (ODA) and other language where it does not. Here we elaborate on these shared and different perspectives and offer amended language to try to bridge the gap. We also share some thoughts on the introductory language preceding the Resolution.

Resolution language:

The Resolution states, in part, that “The Oregon State Board of Agriculture supports, recommends, and encourages the implementation of plain, certain, and science-based rules; consistent policy, procedures, and standards that are necessary to address livestock predation by wolves in Oregon and, in particular, that authorize Oregon’s livestock producers and their agents to use immediate lethal control when necessary to prevent livestock predation by wolves or those in the process of or attempting to kill any livestock according to the Oregon Wolf Conservation and Management Plan.”

We strongly agree on the value of having and implementing “*plain, certain, and science-based rules,*” as well as the value of “*consistent policy, procedures, and standards.*”

Where our perspective differs with that of the Resolution is its assertion that these “*science-based rules,*” and “*policy, procedures and standards*” address livestock predation by wolves with the authorization for “*Oregon’s livestock producers and their agents to use immediate lethal control when necessary to prevent livestock predation by wolves or those in the process of or attempting to kill any livestock . . .*” The field of science will always be evolving; that is the very nature of science. The field of science on how to effectively deter conflicts between livestock and wolves is no exception. The bulk of published, peer-reviewed science on this subject does not find that killing wolves is the most effective method of deterring conflict over the long haul. Killing predators to deter conflicts has been found to typically be ineffective and a costly approach for addressing conflicts with livestock (Lennox et al. 2018).

Despite the regional killing of wolves in an attempt to deter predations, predation has been shown to continue not only in that same year but in following years (Musiani et al. 2005). Even if entire wolf packs are eradicated in the area, once the territory vacuum created by the packs’ elimination is filled with new immigrants, opportunistic predation on livestock by the new resident wolves may occur (*id.*). If no changes in husbandry practices have occurred, that is likely to be the case. In some cases, killing wolves in year one is actually followed by more intensive predation the following year (Fernandez-Gil et al. 2016). Killing wolves at one location may simply move the conflicts to a neighboring farm or ranch (Santiago-Avila et al. 2018).

It is hard to imagine that any livestock operator would wish to cause a problem for their neighbor, or that an operator would want to have to deal with new conflicts every one to two years —at greater expense — if they could instead deter the conflicts to begin with and with less cost over the long haul. The way to do this is through the use of nonlethal conflict deterrence measures which, through scientific research, have shown demonstrated efficacy in achieving the results all parties seek: fewer conflicts between livestock and wolves.

We therefore propose the following amendment to the Resolution language:

[strike the red highlighted language, and replace it with the green highlighted italicized language]

“The Oregon State Board of Agriculture supports, recommends, and encourages the implementation of plain, certain, and science-based rules; consistent policy, procedures, and standards that are necessary to address livestock predation by wolves in Oregon and, in particular, that authorize Oregon’s livestock producers and their agents to use **immediate lethal control when necessary** *non-lethal conflict deterrence measures, with assistance, tools and/or funding help from agencies and non-governmental organizations* to prevent livestock predation by wolves or those in the process of or attempting to kill any livestock according to the Oregon Wolf Conservation and Management Plan.”

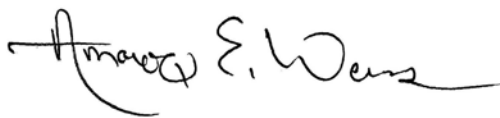
Prefatory language:

The prefatory language to the Resolution is composed of thirteen separate “Whereas” clauses. For your consideration, we recommend the following amended language.

- One clause indicates that “. . . most of Oregon’s wildlife habitat is privately owned by Oregon’s livestock producers and farmer.” Wildlife in Oregon lives across the entirety of the state. Furthermore, most of Oregon is publicly owned (Graves 2019). There is likely no location in Oregon where wildlife does not live. A more accurate representation of the status of lands inhabited by wildlife in Oregon would replace the word *most* with the word *some*.

- Another clause expresses concern for the safety of livestock producers' families and employees due to wolves' proximity to livestock. Longtime wolf biologists have long concluded that wolves want nothing to do with people. In the past 110 years, in all of North America — and despite there being 40-60,000 wolves in Canada and another 7,000 or so in Alaska — there are only two known instances of healthy wild wolves killing a person and only a handful of instances of wolves attacking/injuring a person (Lamplugh 2015). The latter instances have involved wolves which were food-habituated by people, focused on the person's nearby dog (since wolves view all canids as competitors), or unhealthy or diseased wolves (McNay 2002). We understand that many people greatly fear wolves out of concern for human safety, but the science concludes this fear is unfounded. Every year in the United States, on average, dogs kill around 20 people and livestock kill another 20 (Schmitz and Jones 2019). We do not dismiss the fact that people fear wolves, but we do urge a concerted effort by ODA to provide science-based information regarding human safety issues and wolves to your members and the public.
- A third clause suggests that plain, certain, and science-based rules; consistent policy, procedures, and standards are necessary to address livestock predation by wolves in Oregon – and we could not agree more. Such measures are helpful not only to address livestock predation but also *to provide transparency, accountability and enforceability*.

Thank you for this opportunity to provide comments on behalf of our organizations and our Oregon members and supporters.



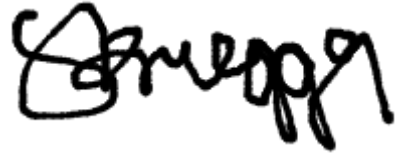
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References

Fernández-Gil A, Naves J, Ordiz A, Quevedo M, Revilla E, Delibes M, 2016. Conflict Misleads Large Carnivore Management and Conservation: Brown Bears and Wolves in Spain. PLoS ONE 11(3): e0151541. doi:10.1371/journal.pone.0151541

Graves, M., 2019. Public and private lands in Oregon. The Oregonian.
<https://projects.oregonlive.com/maps/land-ownership/index.php>

Lamplugh, R., 2015. This is the number of people killed by “fearsome” wolves.
<https://www.thedodo.com/how-many-people-killed-by-wolves-1413351180.html>

Lennox, R.J., Gallagher, A.J., Ritchie, E.G. , Cooke, S.J. , 2018. Evaluating the efficacy of predator removal in a conflict-prone world. Biological Conservation 224: 277-289.

McNay, M., 2002. Wolf-Human Interactions in Alaska and Canada: A Review of the Case History. Wildlife Society Bulletin, 30(3):831-843

Musiani, M., Muhly, T., Gates, C.C., Callaghan, C., Smith, M.E., Tosoni, E., 2005. Seasonality and reoccurrence of depredation and wolf control in western North America. Wildlife Society Bulletin, 33(3):876-887.

Santiago-Avila, F.J., Cornman, A.M., Treves, A., 2018. Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. PLoS ONE 13(1): e0189729. <https://doi.org/10.1371/journal.pone.0189729>

Schmitz, A., Jones, B., 2019. You’re more likely to be killed by a dog or cow in the U.S. than a shark or crocodile. Here’s where the 11 deadliest animals live. Business Insider.
<https://www.businessinsider.com/deadliest-animals-us-dont-include-sharks-crocodiles-dogs-cows-2019-8>



MEMORANDUM

To: Board of Agriculture
From: Mary Anne Cooper and Samantha Bayer, Oregon Farm Bureau
Date: January 14, 2021

Thank you for the opportunity to comment on the Board of Agriculture’s review of board resolutions. We appreciate your hard work over the past several months to review the existing resolutions and improve on the resolutions process.

Our membership has faced unprecedented challenges in 2020 and through the beginning of 2021 associated with COVID-19 response, wildfires, farm labor shortages, and other challenges which have kept them busy on their farms and have create barriers to effective participation in Farm Bureau’s grassroots process. As such, we are not able to meet with our membership regularly to have the critical conversations we need to have to provide a position on board resolutions that may be controversial within our membership. Given that these resolutions were released a week prior to the comment deadline – while our staff is busy with legislative preparation, we have not had time to have conversations that are needed within our membership on these resolutions. In the future, we would request that the Board of Agriculture give as much advanced notice and ability to review the resolutions as possible, especially when resolutions are under review during the busy legislative session. For these resolutions, we would request that the Board not make any decisions at the next meeting, and we request an additional opportunity to comment once we’ve had a chance to discuss these resolutions with our members.

Oregon Farm Bureau offers the following comments on the Resolutions under consideration by the Board of Agriculture. Please do not hesitate to contact us if you have any questions.

Resolution 024 – Pesticide Use for Insect Pest and Disease Control

Pesticides are a critical tool for many of Oregon’s farmers and ranchers in controlling insect pests and diseases. We strongly agree that when used correctly and according to the pesticide label, pesticide use continues to be safe for the public and environment alike and is a necessary part of an integrated pest management strategy for many Oregon farms.

We strongly encourage the Board of Agriculture to strike the language “until other acceptable methods are developed,” as this opens the door to eventually limiting – or eliminating – pesticide use altogether once an “acceptable” alternative is developed. We’ve recently seen the legislature place themselves in the position of discussing pesticide limitations and accepting misleading advocacy from environmental groups that “alternatives” exist when they do not. We also question whether this resolution is aligned with the recent decision by the Department of Agriculture to limit use of a pesticide that has been found to be safe and effective when used according to the label, and where alternatives do not exist for most farmers who use the product.

Farmers and ranchers work hard to utilize the most effective, safest tools available to them – and they should always have every safe and effective tool in their toolbox. That includes pesticides. Pesticide use is not just safe for the environment but can also be beneficial for the environment. It is important that the Board of Agriculture ensure that pesticide use is always supported as a tool that should be available to farmers and ranchers.

We recommend that the Board make the following change to reflect this concept:

The State Board of Agriculture supports the need of agriculture to control insect pests and diseases using pesticide chemicals ~~until other acceptable methods are developed~~ as part of an integrated approach to pest management.

Resolution 203 – Soil and Water Conservation Cost-Share Funds

OFB supports the resolution as written. Both the funds referenced in the resolution and Soil and Water Conservation Districts play a critical function in the Agriculture Water Quality program.

Resolution 274 – Board of Agriculture and the Department of Agriculture Involvement in the Oregon Watershed Enhancement Board

Oregon Farm Bureau currently has no policy directly concerning OWEB. We recognize that OWEB has done a significant amount of important and collaborative work with Oregon farmers and ranchers, and generally support their work. However, we have also had concerns over the years with OWEB’s acquisition program, particularly when it funds projects that take agricultural lands out of production. As such, OFB supports both ODA and the Oregon Board of Agriculture having direct influence over the prioritization and selection of projects for OWEB resource enhancement grant funds to ensure that they are supporting the agricultural community

and not removing lands from agricultural production. We support the resolution as written.

Resolution 169 – Need for Documented Agricultural Work Force

This resolution closely resembles language in OFB’s policy book. We strongly support the resolution as written and would only recommend that the Oregon Board of Agriculture include the most recent statistics related to Oregon agriculture’s farmgate value.

Resolution 266 – Collective Bargaining for Agricultural Workers and Employers

OFB strongly encourages that the following language be added to the collective bargaining resolution to ensure that the autonomy of employees to choose whether they will unionize is protected:

... We support the use of secret ballot elections as the means to determine whether employees want to be represented by a union. We support the right of employers to communicate freely with employees about the effects of unionization in the workplace.

Resolution 314 – Permitted uses on lands zoned exclusive farm use and on high-value farmland agricultural land

Oregon Farm Bureau has three distinct sets of policies related to permitted uses on lands in EFU Zones, but none that are specific to the content of this resolution. It is important that our membership has an opportunity to weigh in on this resolution in the typical grassroots format that Oregon Farm Bureau is well-known for utilizing. Many of our members lack adequate access to virtual meeting options, therefore making in-person meetings the only available option for engaging in such a grassroots process – an avenue not available to us because of the current COVID-19 restrictions. While we find this topic incredibly important, we would ask that the Board of Agriculture hold off on review of this resolution until after the COVID-19 pandemic and the restrictions associated with it no longer limit our ability to meet and discuss policy related to this resolution.

Resolution 315 – Working Lands Conservation Easements

The Oregon Farm Bureau was one of the supporters of the Oregon Agricultural Heritage Program, and has policy that supports agriculture working lands conservation easements for the primary purpose of protecting farmland for continued agriculture use, while providing wildlife habitat and environmental benefits. Our policy also provides that an easements should not impact neighboring agriculture operations, and that if a conservation easement negatively impacts a neighboring agriculture operation, the

neighboring agriculture operation should have an appropriate available remedy. We generally support the resolution on working lands conservation easements, though we suggest updating it to reflect the passage of the Oregon Agricultural Heritage Program, the Board's role in appointing the Commission charged with program administration, and aligns this resolution with that program.

Resolution 316 – Federal Minimum Wage Parity

We acknowledge that rising costs of labor due to recent increases to minimum wage in the State of Oregon continue to diminish profit margins of farmers and ranchers in Oregon. The diminished margins and increasing cost of production limit the national and international competitiveness of products produced by farmers and ranchers in Oregon. Oregon Farm Bureau has always clearly stated that we do not support a minimum wage but do believe that if the State of Oregon is going to have a minimum wage, it should mirror that of the federal government. We therefore support parity between Oregon's minimum wage and the federal minimum wage.

Please contact Mary Anne Cooper at maryanne@oregonfb.org or Samantha Bayer at samantha@oregonfb.org with any questions



To: Board of Agriculture
Date: January 14, 2021
From: Gail Greenman, Director of National Affairs, Oregon Farm Bureau

Re: Resolution 317 – Oregon Department of Agriculture’s role in the Food Safety Modernization Act produce rule implementation

The Oregon Farm Bureau is writing to urge you to consider adopting changes to Resolution 317 regarding the Oregon Department of Agriculture’s role in the Food Safety Modernization Act produce rule implementation as outlined below.

Consumers in the United States enjoy the safest and healthiest food supply in the world, however, food-borne illnesses can still occur. In our food safety regulatory system, local, state and federal partners share the responsibility of keeping food safe. State agencies, including state departments of agriculture, play a vital role in implementing and enforcing our nation’s system of food safety and inspection laws.

In 2011, the Food Safety Modernization Act (FSMA) was signed into law and fundamentally transformed our country’s food safety system from reactive, inclusive of recalls and trace back to preventive measure including education and evaluation. As part of the implementation of FSMA, the US Food and Drug Administration (FDA) established science-based minimum standards for the safe growing, harvesting, packing, and holding of fruits and vegetables grown for human consumption as outlined in FDA’s regulation, “[Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption](#)” (commonly referred to as the Produce Safety Rule). The rule is part of the agency’s ongoing efforts to implement FSMA. The final rule went into effect January 26, 2016.

FDA also established State Produce Implementation Cooperative Agreement Program (CAP). The outcomes of this cooperative agreement program are to:

- Advance efforts for a [National Integrated Food Safety System \(IFSS\)](#).
- Plan, establish, and/or enhance state and territorial produce safety programs.
- Encourage the safe production of fresh fruits and vegetables.
- Promote understanding and compliance with the requirements of the Produce Safety Rule.

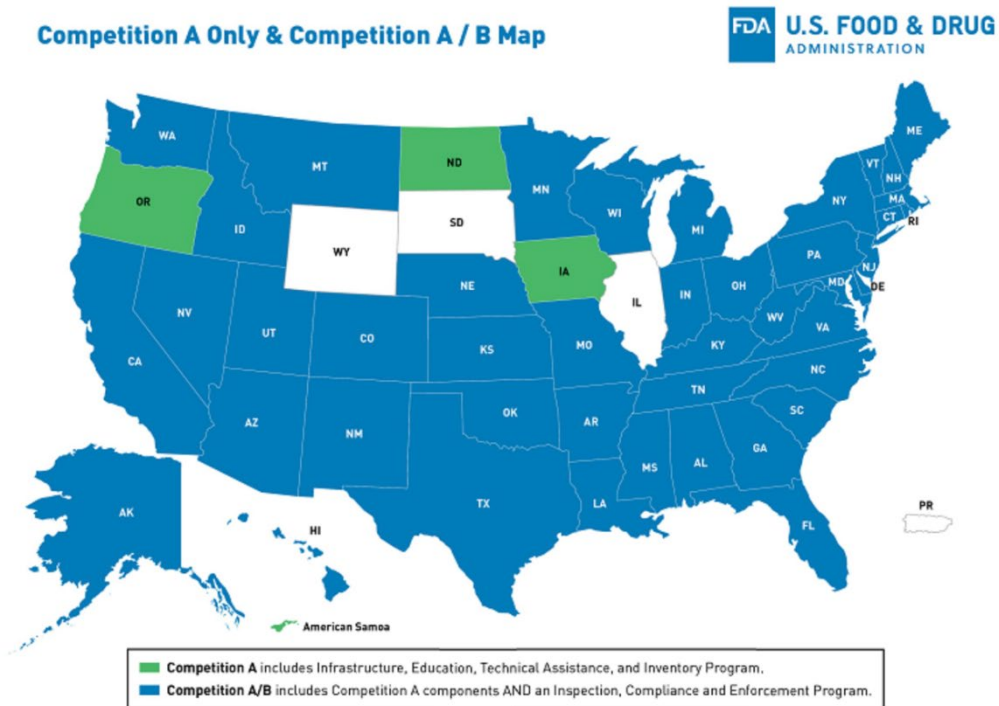
The goals of this cooperative agreement are to provide awardees with the resources to:

- Assess their produce landscape.
- Establish a process to develop and maintain a produce farm inventory.
- Provide resources for, and invest in, their program's infrastructure.

- Coordinate with other local, state, territory, and federal agencies for produce safety activities.
- Formulate a multi-year plan to implement a produce safety system.
- Develop a performance measurement system, plan, and/or process system to measure the progress towards the goals of this cooperative agreement.
- Evaluate produce legislative or regulatory authority.
- Develop and/or provide education, outreach, and technical assistance, prioritizing farming operations covered by the rule.
- Develop and/or provide education, outreach, and technical assistance to the jurisdictional produce safety regulators.
- Design and implement a compliance program for applicable produce safety regulations at the jurisdictional level.

Current awardees for this cooperative agreement include state/territory government food agencies with actual or potential regulatory oversight and responsibility over their respective jurisdiction's commodities regulated in FDA's Produce Safety Rule. States applied for either Competition A only or Competition A/B. Competition A includes Infrastructure, Education, Technical Assistance, and Inventory Program. Competition A/B includes Competition A components AND an Inspection, Compliance and Enforcement Program. Oregon has only applied for Competition A. **Oregon Farm Bureau encourages and supports ODA applying for Competition A/B funds.**

As you can see Oregon is one of very few states and perhaps the only specialty crop states not applying for the maximum funding the state is entitled to received:



There are 5 tiers of funding ceilings based on the number of farms growing covered produce within the jurisdiction. Tier status is based on data furnished by the United States Department of Agriculture's National Agricultural Statistics Survey. Funding amounts are based on the tier and competition for each state.

- Year 1 (9/2016 - 6/2017) awards total \$21.8 million.
- Year 2 (7/2017 - 6/2018) awards total \$30.9 million.
- Year 3 (7/2018 - 6/2019) awards total \$32.5 million.
- Year 4 (7/2019 - 6/2020) awards total \$27.1 million.

Oregon Farm Bureau commits to collaborating with ODA and other stakeholder groups and working with our congressional delegation, who has demonstrated a long standing dedication to the issue of food safety, to ensure these funds continue to be available.

Additional resources included the 2014 Cooperative Agreement between the National Association of State Departments of Agriculture (NASDA) and FDA to help NASDA assist its members to implement the FSMA Produce Safety Rule. Currently, 46 states and one territory have entered into cooperative agreements with the U.S. Food and Drug Administration (FDA) to educate and/or regulate farms. These cooperative agreements provide the funding and support necessary to determine the current foundation of state law, the resources needed by states to implement the produce safety rule, as well as develop a timeline for successful implementation of the rule.

We would implore Oregon's Board of Agriculture to joint those 46 states and have Oregon be lead FSMA inspection agency for Oregon's producers in implementing significant portions of FSMA, including:

- **Produce Safety Rule (including special provisions for sprout production)**
- **Preventive Controls for Human Food**
- **Preventive Controls for Animal Food**

Oregon Farm Bureau is appreciative of Oregon Department of Agriculture's (ODA) FSMA review and preparation opportunities they offer to Oregon producers for FSMA inspections, but we think it is essential that ODA go further and perform the FSMA audits on behalf of the FDA.

Respectfully submitted,

Gail Greenman
Director of National Affairs
Oregon Farm Bureau Federation

From: Matthew Brady mbrady.glide@gmail.com
Subject: Livestock and Wolves Resolution
Date: January 14, 2021 at 4:11 PM
To: Staff Karla Valness kvalness@oda.state.or.us

MB

Dear Staff Valness,

I am a 5th generation farmer and sheep producer in southern and eastern Douglas County Oregon. While I have not personally suffered losses from wolves, it is a ever-present concern given my farm's proximity to the range of the Rouge wolf pack.

Wolf reintroduction in the state has been overwhelmingly successful, with the numbers of wolves growing significantly year to year. However, the impact of wolf reintroduction has been born exclusively by farmers and ranchers. We have been left without the necessary tools to co-exist and manage wolves that kill or injure our livestock.

The current resolution correctly recognizes many of the challenges and costs associated with wolf reintroduction in Oregon, and correctly advocates for the tools that ranchers need to help coexist with wolves. I support the existing language, and recommend adding a section supporting changes to the Oregon Wolf Conservation and Management Plan to help ensure ranchers have the tools they need to manage wolf conflicts.

The State of Oregon must normalize wolf management and treat wolves as they treat other predators in the state. We need changes to the Oregon Wolf Conservation and Management Plan to require increased management of wolf populations through collaring and wolf management zones, authorize take of problem wolves in all phases, and allow for qualified local determinations of depredations. These changes would begin to give ranchers the tools they need to coexist with wolves while protecting their livestock from repeated depredation.

These changes were not adopted in the last update to the Plan. I request that the Board update their resolution to advocate for changes to the Oregon Wolf Conservation and Management Plan the normalize management of wolves with other predators, give landowners the tools they need to co-exist with wolves, and support adequate compensation for ranchers who experience wolf depredation.

Matthew Brady

Sincerely,

Matthew Brady
1545 Azalea Glen Rd
Azalea, OR 97410
mbrady.glide@gmail.com