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The Cattleman
CATTLE RAISERS INSURANCE

January 22, 2018

Docket ID: APHIS-2017-0109
Agency: Animal and Plant Health Inspection Service (APHIS)
Parent Agency: Department of Agriculture (USDA)

Submitted electronically at www.regulations.gov

RE: Docket No. APHIS-2017-0109, Cattle Fever Tick Eradication on Laguna Atascosa and Lower Rio Grande Valley National Wildlife Refuges.

The Texas and Southwestern Cattle Raisers Association (TSCRA) appreciates the opportunity to comment on the United States Department of Agriculture - Animal and Plant Health Inspection Service's (USDA-APHIS) environmental assessment (EA) pertaining to Cattle Fever Tick Eradication on Laguna Atascosa and Lower Rio Grande Valley National Wildlife Refuges.

TSCRA is a 140-year-old trade association and is the largest and oldest livestock organization based in Texas. TSCRA has more than 17,500 beef cattle operations, ranching families and businesses as members. These members represent approximately 55,000 individuals directly involved in ranching and beef production who manage 4 million head of cattle on 76 million acres of range and pasture land primarily in Texas and Oklahoma, and throughout the Southwest.

Cattle fever ticks pose a significant cattle health threat to the United States and could have detrimental effects on the cattle market, beef supply and trade if not controlled. These factors make the ability of the Cattle Fever Tick Eradication Program (CFTEP) to effectively eradicate cattle fever ticks from the U.S. of utmost importance to our industry.

Background
Rhipicephalus annulatus and *Rhipicephalus microplus* cattle fever ticks were eradicated from the United States by 1943, except in the Permanent Quarantine Zone in South Texas that extends more than 500 miles from Del Rio, Texas to the Gulf of Mexico. This was 21 years before Texas and New Mexico were declared free of the endemic screwworm infestation in 1964. In 1943 the presence of screwworms had minimized white-tailed deer populations in Texas, and the Nilgai antelope that were introduced in the 1930's had yet to build-up significant population numbers. The only host that could efficiently spread cattle fever ticks at that time were cattle. This enabled systematic treatment of cattle to be very effective in eradicating cattle fever ticks from the United States.

In recent years, eradicating cattle fever ticks from the landscape has become increasingly difficult. This is primarily due to changes in land use, increased white-tailed deer and nilgai populations, and climatic cycles that favor cattle fever tick expansion. The cumulative impact of

these factors is evident by the 2,969 premises encompassing nearly 1.4 million acres that are under some level of quarantine due to cattle fever ticks. Quarantined ranchers and private landowners are obligated by law to comply with the cattle fever tick eradication efforts prescribed under CFTEP which is cooperatively administered by USDA-APHIS and Texas Animal Health Commission (TAHC). This program's success is reliant upon the full implementation of all available cattle fever tick eradication methods on all private, public, and refuge lands.

TSCRA greatly appreciates the actions taken by the United States Fish and Wildlife Service (FWS) thus far which are outlined in this EA. The utilization of prescribed burning on over 26,000 acres of the Laguna Atascosa National Wildlife Refuge (LANWR) and the responsible reduction of both native and invasive wildlife host populations on LANWR and the Lower Rio Grande Valley Nation Wildlife Refuge (LRGVNWR) were desperately needed. TSCRA praises the commitment of FWS to further their fever tick eradication efforts for the benefit of affected wildlife, the surrounding community and the U.S. beef industry.

TSCRA strongly supports the continuation of prescribed burning, meaningful nilgai reductions, increased hunting opportunities for white-tailed deer and nilgai, and the utilization of ivermectin-treated corn on non-refuge lands. TSCRA also strongly advocates for the full implementation of additional cattle fever tick eradication strategies as outlined in this EA.

Ivermectin-treated corn for white-tailed deer treatment

USDA-APHIS published the final environmental assessment titled "Cattle Fever Tick Eradication Program - Use of Ivermectin Corn" in January of 2017. The EA considered the environmental impacts of feeding ivermectin-treated corn in Cameron, Hidalgo, Jim Wells, Kinney, Live Oak, Maverick, Starr, Val Verde, Webb, Willacy, and Zapata counties. After receiving public comments, a Finding of No Significant Impact (FONSI) was issued on the EA which allowed USDA-APHIS and TAHC to administer ivermectin-treated corn on non-refuge lands. These counties collectively contain over 10.6 million acres of non-refuge land where ivermectin-treated corn can now be fed on an as needed basis.

The negligible effects of ivermectin on the environment found in this EA and the January 2017 final EA titled "Cattle Fever Tick Eradication Program - Use of Ivermectin Corn" paired with the importance of treating white-tailed deer for cattle fever ticks assure TSCRA's enthusiastic support for administering ivermectin-treated corn on refuge lands.

Experimental Cattle Grazing

FWS, USDA, and TAHC have invested an enormous amount of time and effort researching the environmental impact, practicality, and logistics of using cattle as a mechanism to eradicate cattle fever ticks on LANWR and LRGVNWR. Whereas cattle haven't been seen on either refuge in many years, grazing cattle on refuge lands is not a new concept.

Cattle still graze many of the over 550 refuges in the National Wildlife Refuge System, and cattle grazing occurred on LANWR from its founding in 1946 until 1974. Page 68 of the 1969 Laguna Atascosa Wilderness Study Report shows that 130 head grazed 4,765 acres of Unit IV that year. Today Unit IV has a dense population of nilgai antelope where cattle once were. The nilgai on Unit IV were found to be heavily infested during population reduction efforts and cattle fever ticks

have been regularly found on cattle grazing pastures adjacent to the refuge. A mechanism to systematically eradicate cattle fever ticks from LANWR is direly and clearly needed for the CFTEP to be effective.

The USDA-Natural Resources Conservation Service's (NRCS) Grazing/Production Report for LANWR referenced in this EA determined the forage production and possible recommended stocking rates of Units V, VIII and the Boswell-Jenkins addition. Allowing cattle that are under systematic treatment for cattle fever ticks to occupy these strategically located areas will be incredibly beneficial to cattle fever tick eradication efforts.

Cattle, nilgai, and white-tailed deer are the most common cattle fever tick hosts present in South Texas. All potential hosts must be addressed for the CFTEP to be successful, however no treatment is currently available for nilgai and deer can't receive treatment year-round due to withdraw periods of ivermectin. Without cattle, there are no year-round methods to administer treatment against cattle fever ticks thus the necessity to have cattle under systematic treatment present. Though only part of the solution, cattle under systematic treatment is imperative to efficiently eradicate cattle fever ticks from the landscape.

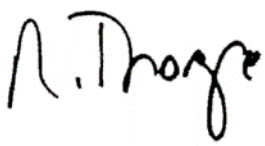
Additionally, utilizing cattle to eradicate cattle fever ticks from LRGVNWR has a mutualistic effect on the refuge. The 2002 Grazing Management Plan for LRGVNWR describes how exotic grasses threaten resources, and how cattle grazing can be used to achieve refuge objectives by reducing these threats. For LRGVNWR cattle would not only be a mechanism to eradicate cattle fever ticks, but would inadvertently reduce the risk of wildfires and assist the establishment and recovery of native brushland vegetation.

Conclusion

TSCRA unequivocally supports the continued utilization of prescribed burning and the responsible reduction of both native and invasive wildlife host populations on LANWR and the LRGVNWR. Based on the analysis contained in this and prior EAs, the considered cattle fever tick eradication strategies do not have a significant impact on the environment. TSCRA resoundingly supports the full implementation of additional cattle fever tick eradication strategies due to their negligible adverse impact on the environment and the many advantages realized by eradicating cattle fever ticks from LANWR and LRGVNWR.

TSCRA would again like to thank the many staff at FWS, USDA, and TAHC who contributed to this EA and devised a plan to eradicate cattle fever ticks from refuge lands. If you have any questions regarding these comments, please contact Kaleb McLaurin at 512-469-0171 or at kmclaurin@tscra.org.

Sincerely,



Richard Thorpe
President