



National Cattlemen's
Beef Association



January 22, 2018

RE: APHIS-2017-0109, The USDA Animal and Plant Health Inspection Service's (APHIS) Veterinary Services program and the U.S. Fish and Wildlife Service's Environmental Assessment of Cattle Fever Tick Eradication on Laguna Atascosa and Lower Rio Grande Valley National Wildlife Refuges, Request for Stakeholder Comments

The National Cattlemen's Beef Association (NCBA), the oldest and largest national trade association representing cattlemen and women in the United States, in collaboration with the National Milk Producers Federation (NMPF) and the American Association of Bovine Practitioners (AABP), appreciates the opportunity to provide comments on the United States Department of Agriculture's APHIS, Veterinary Services (USDA-APHIS, VS) and the U.S. Fish and Wildlife Service (FWS) Cattle Fever Tick Eradication on Laguna Atascosa and Lower Rio Grande Valley National Wildlife Refuges Environmental Assessment (EA). The members of our three organizations are firmly committed to ensuring the health and well-being of cattle in the United States.

The Cattle Fever Tick Eradication Program (CFTEP) is a vital national program aimed at preventing the reintroduction of cattle fever ticks to the United States. We applaud the collaboration and cooperation between USDA-APHIS and FWS in the development of this EA, which in the Alternative B, or Proposed Action, option describes the expansion of successful cattle fever tick eradication strategies to the Laguna Atascosa National Wildlife Refuge (LANWR) and Lower Rio Grande Valley National Wildlife Refuge (LRGVNWR). With no current cattle fever tick eradication efforts on the LANWR or LRGVNWR, these areas act as reservoirs for cattle fever ticks. As a result, the wildlife on these refuges serve as transporters for the ticks and wildlife vectors continuously spread ticks beyond the refuges to land and cattle outside and within the Permanent Fever Tick Quarantine Zone.

Ivermectin-Treated Corn Feeders

Current cattle fever tick eradication efforts by the CFTEP have shown that the effectiveness of the program is dependent upon the combined treatment of cattle and wildlife hosts, such as white-tailed deer. The use of feeding stations, filled with ivermectin-treated corn, to treat white-tailed deer has been shown to be an effective method to minimize the movement and population of cattle fever ticks. We fully support the proposal to expand feeder sites to the LANWR and LRGVNWR. We would like to know if plans have been made to continue to attract white-tailed deer to the corn feeder sites from August to January when ivermectin-treated corn cannot be used due to withdrawal times for hunting? A proposed solution, mentioned in NCBA's comments on the *Cattle Fever Tick Eradication Program Use of Ivermectin Corn Draft Environmental Assessment*¹ in December 2016, is to fill the feeders with untreated corn during the hunting withdrawal months in an effort to maintain regular visits to the feeding stations year-round and establish a continuous pattern of use for the deer.

¹ Cattle Fever Tick Eradication Program Use of Ivermectin Corn Draft Environmental Assessment [APHIS-2016-0097] - www.regulations.gov

Grazing

We support the proposal of experimental cattle grazing on the LANWR and LRGVNWR by USDA-APHIS/Texas Animal Health Commission via Special Use Permits (SUPs) issued by the South Texas Refuge Complex (STRC). As mentioned in the EA and referenced documents, such as the *Laguna Atascosa Refuge Cameron County, Texas Grazing/Production Report*, there are multiple benefits to using cattle grazing as part of an integrated approach to cattle fever tick eradication. These benefits include control of the cattle fever ticks, disruptions to the tick lifecycle, and consumption and reduction of exotic grasses, which inhibit native vegetation growth and increase fire risk. Additionally, evaluating the effectiveness of the different combinations of cattle fever tick treatments on the refuges will allow for more efficient use of resources in the future. At the same time, after reviewing the criteria for the experimental cattle grazing program, we have a few clarifying questions regarding the details of the program. Understanding that specific areas for grazing have not been identified, for each of the 6 treatment combinations, how many sites on the refuges are anticipated to be designated for each combination? While we are aware of the multiple environmental factors, is there an estimated length of the grazing season? The EA and the *Laguna Atascosa Refuge Cameron County, Texas Grazing/Production Report* note that the recommended stocking rate is 50 animal units among the 3 units of the LANWR. Are these animal units, as described, intended to be on an annual or monthly timeframe? Additionally, are there recommended stocking rates for grazing the tracts of land on the LRGVNWR? Lastly, we are interested to know how FWS plans to continuously monitor the experimental grazing program?

Conclusions

Overall, NCBA and the undersigned organizations support the Alternative B, or Proposed Action, option to implement additional cattle fever tick eradication strategies listed in this Cattle Fever Tick Eradication on Laguna Atascosa and Lower Rio Grande Valley National Wildlife Refuges Environmental Assessment by USDA-APHIS and FWS. We agree that efforts to eradicate cattle fever ticks require a coordinated and integrated approach, including treatment of wildlife and cattle grazing. If the results of the experimental cattle grazing program show a reduction in cattle fever tick populations, we would ask that such methods be applied to other areas of the STRC and ask that implementation of such measures be fully described in future documents on cattle fever tick eradication. Additionally, we believe subsequent cattle fever tick eradication plan documents should include methods to keep feeders attractive to white-tailed deer during the months where ivermectin-treated corn is not being supplied. We feel that Alternative A, or the No Action Alternative, is unacceptable and would, in fact, be detrimental to the cattle industry, having an adverse impact on cattle health and well-being as well as threaten the spread of cattle fever ticks to additional areas outside of the quarantine zone.

We commend the collaborative efforts of USDA-APHIS and FWS to safeguard animal health through their concerted actions proposed in this environmental assessment. We appreciate the opportunity to provide our joint comments and look forward to a continued dialogue with USDA-APHIS and FWS on this and other cattle health issues. For additional clarifications or questions, please contact Dr. Jessica Watson, NCBA's Manager of Animal Health Policy at 202-347-0228, or at jwatson@beef.org.

Sincerely,



Craig Uden

President, National Cattlemen's Beef Association

A blue ink signature in cursive script that reads "James Mulhern".

James Mulhern
President & CEO, National Milk Producers Federation

A black ink signature in cursive script that reads "K. Fred Gingrich II, DVM".

K. Fred Gingrich II, DVM
Executive Vice President, American Association of Bovine Practitioners