



# NATIONAL DEER ASSOCIATION

P.O. Box 162305 · Atlanta, Georgia 30321 · phone: 1-800-209-3337 · [DEERASSOCIATION.com](http://DEERASSOCIATION.com)

Mitch Lockwood  
Big Game Program Director  
Texas Parks and Wildlife Department  
4200 Smith School Road  
Austin, Texas 78744

8 August, 2022

**RE: Proposed amendments to chronic wasting disease (CWD) zone rules**

Dear Mr. Lockwood:

On behalf of the National Deer Association (NDA), I am writing to provide our comments in support of the Texas Parks and Wildlife Department's (TPWD) recently proposed amendments to 31 TAC §65.81 and §65.82 concerning Disease Detection and Response. We are a national non-profit conservation organization with the mission to ensure the future of wild deer, wildlife habitat and hunting. We represent 30,000 members nationwide, including hunters, landowners and natural resource professionals.

The NDA outlines deer diseases as a critical focus area and slowing the spread of chronic wasting disease (CWD) is of primary concern. CWD is one of the largest threats to wildlife conservation that we have encountered over the last century. As many states have learned, slowing the spread of this always-fatal disease is a daunting task and early detection and rapid response once the disease is found is critical for long-term management. Through our extensive work on this issue across North America, we know that proactive, science-based management by state wildlife and agricultural agencies is imperative to keeping prevalence rates low, deer populations healthy and hunter engagement stable.

We support the TPWD's proposed amendments to establish one new containment zone (CZ) 6, expand existing CZ 3, create a new surveillance zone (SZ) 8, and modify existing SZ 5 to either implement or improve surveillance efforts as part of the agency's effort to manage CWD. Both containment zones and surveillance zones are invaluable tools for state wildlife agencies to detect and monitor disease spread, and of course, boundaries of these zones must expand and/or shift as disease incidence expands or shifts. We've supported similar TPWD proposals in the past, including proposals regarding disease testing requirements and carcass handling.

Undoubtedly, the deer hunting tradition and industry in Texas has deep and widespread roots. Nationwide, about 80% of hunters pursue deer, and research has shown that CWD prevalence discourages hunter participation, ultimately threatening our deer hunting traditions and the Pittman-Robertson model of conservation funding. Now is the time to use all resources at the disposal of the TPWD to work with hunters, landowners and captive cervid facility operators to curb the troubling and rapidly-expanding spread of CWD in Texas.

The NDA appreciates the TPWD's proactive and aggressive approach to managing CWD, including the proposed amendments to 31 TAC §65.81 and §65.82 concerning Disease Detection and Response. These actions should advance Texas's effort to reduce the disease risk to the state's wild deer. We encourage

TPWD to continue to work collaboratively and in cooperation with other state agencies, and we applaud the continued inclusion of the interests and involvement of various stakeholder groups in the disease management process.

Please don't hesitate to reach out with questions or for more information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Torin Miller', with a stylized, cursive script.

Torin Miller  
*Director of Policy*