

October 26, 2023

The Honorable Jeffery Hildebrand, Chairman  
Dr. David Yoskowitz, Executive Director  
Texas Parks and Wildlife Department  
4200 Smith School Road  
Austin, Texas 78744

Dear Chairman Hildebrand and Dr. Yoskowitz:

The undersigned organizations write on behalf of American sportsmen and women, conservationists and wildlife professionals, and the wildlife which they steward. We write to express support for proposed amendments to Texas Parks & Wildlife Department's Chronic Wasting Disease Management & Response Regulations.

The worsening trend of CWD detections across Texas and the United States threatens not only the health and sustainability of free-ranging deer herds, but also the deer hunting economies on which rural communities depend. In Texas alone, deer hunting generates over \$4.3 billion in economic activity each year. To ensure that the tradition of deer hunting in Texas remains for generations more, it is critical that wildlife managers are equipped with an oversight toolkit that prioritizes rapid detection and traceability. The proposed regulations succeed in improving the ability of TPWD to meet that need.

Notably, requiring permanent, visible identification for all released breeder deer is a measure already required in the Parks & Wildlife Code (Section 43.3561), that will expedite the removal of deer linked to positive detections from release sites and improve the effectiveness of the agency's epidemiological investigations. Further, requiring a negative antemortem test prior to the transfer of breeder deer will minimize scenarios of CWD moving from one facility to another. This sensible step forward builds on previous testing requirements for known endemic facilities and will slow the unprecedented pace of disease spread that has resulted from the movement of positive deer across the state in recent years.

The Association of Fish & Wildlife Agencies Technical Report on CWD Best Management Practices cites the anthropogenic movement of deer as one of the greatest risks of spreading the disease. In lieu of a stoppage on the movement of captive cervids, a full suite of management tools to monitor this practice is necessary. The emergency adoption of both above measures by the Commission in July of this year was prudent, and we encourage their permanent adoption alongside the other amendments to be considered at the November meeting.

We appreciate the difficult task before the Texas Parks & Wildlife Department in suppressing the threat of CWD among Texas deer herds and thank you for the opportunity to provide these comments.

Sincerely,

Archery Trade Association  
Backcountry Hunters & Anglers  
Boone & Crockett Club  
Mule Deer Foundation  
National Deer Association  
National Wildlife Federation  
Pope & Young Club  
Rocky Mountain Elk Foundation  
Texas Chapter of Backcountry Hunters & Anglers  
Texas Wildlife Association  
Theodore Roosevelt Conservation Partnership  
The Wildlife Society

CC:

The Honorable James Abell, Commissioner  
The Honorable Oliver Bell, Commissioner  
The Honorable William Doggett, Commissioner  
The Honorable Paul Foster, Commissioner  
The Honorable Anna Gallo, Commissioner  
The Honorable Robert Patton, Commissioner  
The Honorable Travis Rowling, Commissioner  
The Honorable Richard Scott, Commissioner  
The Honorable Lee Bass, Chairman Emeritus  
The Honorable Dan Friedkin, Chairman Emeritus  
The Honorable Charles Perry, Chairman, Senate Committee on Water, Agriculture & Rural Affairs  
The Honorable Trent Ashby, Chairman, House Committee on Culture, Recreation & Tourism  
The Honorable Coleman Locke, Chairman, Texas Animal Health Commission  
Dr. Bud Dinges, TAHC Executive Director  
Dr. Andy Schwartz, TAHC