



October 26, 2020

Sunset Advisory Commission
Attention: Public Comments on TPWD & TAHC
P.O. Box 13066
Austin, Texas 78711

Via Email: sunset@sunset.texas.gov

Sunset Advisory Commission:

Please let this letter serve as public input on behalf of the Texas Deer Association (TDA) regarding the Commission's evaluation of the Texas Parks and Wildlife Department (TPWD) and the Texas Animal Health Commission (TAHC).

The Texas Deer Association has provided public comments at every available venue throughout this review. However, to date, this review process has not allowed for oral testimony from our Association's leadership and members. Our Association feels strongly that the process during this pandemic has failed to yield a substantive public review of either agency due to no public testimony (virtual or in-person). Our Association remains concerned that there has not yet been a setting available for an authentic, productive discussion for our Association to share issues of major concern at the Texas Parks and Wildlife Department or the Texas Animal Health Commission. Public testimony, and the dialogue that occurs in a public hearing with members of the Sunset Commission during a hearing, is a vital part of the sunset review process that to date has not happened. We remain hopeful that we will have an opportunity for this important dialogue regarding both agency structures at some point in the near future.

The Texas Deer Association strongly believes there are many improvements that can be made to both agencies' operations and services that would greatly increase efficiency and lead to a reduction of duplicative efforts between the two regulatory authorities.

Currently, both TPWD and the TAHC have jurisdiction over white-tailed deer breeding operations and disease management responses involving those animals. This dual oversight represents a clear duplication of efforts between the two agencies. The existing regulatory framework is not cost effective. Disease management and breeding operations should be overseen by veterinarians and epidemiologists, both of which are TAHC's expertise. TDA strongly believes that the jurisdiction over disease management of captive cervids should be removed from TPWD and transferred to TAHC.

TAHC is uniquely equipped to manage, surveil, and respond to all diseases that affect captive white-tailed deer, not just Chronic Wasting Disease - including fever tick, anthrax, tuberculosis, brucellosis, etc. TDA strongly believes that TAHC should have exclusive jurisdiction over disease management in deer breeding facilities in Texas.

The issue of captive deer management has been heavily politicized for many years. Science and economics should be the determining factors in this discussion, not politics. By eliminating duplicative agency responsibilities, the State of Texas will save on Full-time Equivalent (FTE) employees and decrease overall program appropriations pertaining to disease management in captive white-tailed deer.

Again, we are very concerned about the impact of the pandemic on this Sunset review process, and we appreciate fully the difficult decisions members of the Sunset Commission have had to make. We completely understand the complexities that Covid-19 has bestowed on the Commission; however, the lack of public testimony is unacceptable. We urge the Commission members to maintain impartiality on our issues, as we will attempt to address these concerns when a thorough public process can be established.

Respectfully,

A handwritten signature in cursive script that reads "Patrick Tarlton". The signature is written in black ink and is positioned below the "Respectfully," text.

Patrick Tarlton
Executive Director
Texas Deer Association