

Petition to the Texas Parks and Wildlife Commission to revoke the requirement that deer hunting be archery only hunting in Collin, Dallas, Grayson, and Rockwall Counties, and allow take by firearm during general season and MLDP season, therefore establishing regulatory uniformity in Texas.

The reasons for this petition include:

1. A bowhunting only requirement denies deer hunting opportunity and recreation to a large percentage of the hunting population, including youth hunters, first time hunters, and other hunters physically incapable or nonproficient in operating archery equipment.
2. Youth hunting opportunities, and the opportunity to introduce first time adult hunters to the sport of hunting are greatly reduced by requiring hunters to use archery only equipment and the result will be a continuance of downward participation by the general public in the sport of hunting.
3. Allowing hunting of deer with a firearm does not prevent bowhunters from pursuing their sport, even where gun hunting is allowed, bow hunters still have a much longer opportunity to hunt than the general gun hunting population and are given preferential treatment in pursuing their sport.
4. Although some hunters in these counties may suggest the need to retain bow hunting is a public safety issue, the discharge of firearms in a county is regulated by city and county ordinance and is not the responsibility or purview of TPWD. TPWD regulatory responsibility is to set the county harvest regulations necessary to manage our white-tailed deer population through appropriate season lengths and bag limits. TPWD may set the method of take, e.g. firearm, archery, or muzzleloader, but if there is not biological justification to restrict method of take the Department should allow for all legal means during the appropriate seasons. Additionally, regulation aimed at firearm deer hunting should not apply where discharge of firearms is allowed for purposes of hunting species other than deer, such as wild turkeys, waterfowl, small game, wild hogs, exotic game, coyotes, and other predators. Obviously doing so creates a double standard aimed at preventing gun deer hunters from pursuing their sport. As to public safety concerns, not allowing firearm hunting in most rural areas also results in increased deer density creating additional danger to the public from vehicle collisions and other public health concerns addressed later in this petition.
5. Not allowing firearm deer hunting fails to recognize the keystone role that white-tailed deer play in the environment. It is well documented, and universally recognized by wildlife professionals, that over population of deer have dramatic and damaging ecological impacts on both the environment and other species of wildlife. Among these effects are the impact of deer browsing selectively impacting forest tree species and regeneration, and causing the loss of forest understories and other woody and herbaceous vegetation that are key to forest and prairie ecosystem health. Those impacted plant species are critical to large numbers of other game and non-game wildlife, including rare and declining species. Habitat degradation can be magnified on properties surrounded by game-proof fencing if populations are not kept within the carrying capacity of the habitat. Failing to provide landowners the necessary tools and

means to manage deer populations in an efficient and effective manner, such as with firearm harvest, is irresponsible of the Department.

6. Lack of proper deer management through population control with firearm use also creates a variety of other issues for landowners and the public. Besides the ecological damage, substantial economic damage and public health is at stake. Not being able to prevent deer overpopulation, with the affordable use of firearms, carries significant economic damage to landowners on many fronts. Obviously, it lessens opportunity to obtain income through commercial hunting, including hunting leases. As a result of nutritional stress caused by not keeping deer herds in balance with their environment, it prevents landowner ability to improve quality, productivity, and health of their animals, thus their value. Not as evident, but probably more significant than opportunity lost, is the economic damage to property value from damage deer cause when not maintained in balance with their habitat. Increased deer density causes significant horticultural and agricultural crop damage and loss and can even prevent landowners from planting crops at all because they know doing so is an exercise in futility. Increased deer density also creates major economic damage and public health risk from vehicle collisions. Add to this increased property value lost from land that would otherwise be attractive to prospective buyers for hunting opportunity.
7. Public and veterinary health is put at risk by not allowing landowners an affordable option to control deer numbers. The role of deer as reservoirs of important diseases, and disease vectors, to domestic livestock and humans is well known. In respect to humans, the most significant is Lyme disease which is spread by the black legged deer tick. Humans and domestic animals are also subject to several other biting insects and ticks which white-tailed deer serve as host for, most notably the lone star tick, which as well as being a disease vector, can and does cause serious infestations of humans and domestic animals. Deer are important reservoir hosts to fever ticks, vectors of a fatal disease of cattle and horses, currently confined to South Texas, but at serious risk for reestablishment throughout the Southern US, including the bowhunting only counties. If re-established, this disease would cost billions. Other important diseases of concern to domestic livestock and public health, which deer can carry, include Anthrax, Leptospirosis, Salmonellosis, Brucellosis, and Malignant Catarrhal fever. All of these become more probable with increased deer densities.
8. Having counties with archery only hunting creates confusion to segments of the public who expect consistent hunting regulation across the state and may be unaware that it is unlawful to hunt deer with a firearm, particularly when it is lawful to hunt other species with a firearm in that same county.
9. Finally, it is very probable that by not allowing landowners cost efficient means of population control through firearms harvest, the opportunity for contact and spread of the most concerning disease of deer, Chronic Wasting Disease, is greatly amplified over what it would otherwise be if landowners were provided the means of controlling deer within balance of their habitat.

In conclusion, we would like to point out that what is being asked is exactly what Texas Parks and Wildlife's written Mission statement and Philosophy require. These are quoted below. We

feel to ignore this petition would be gross neglect of the mission of the Department and its responsibility to wisely conserve and manage wildlife resources and their use by the public.

**TPWD MISSION:** *To manage and conserve the natural and cultural resources of Texas and to provide hunting, fishing and outdoor recreation opportunities for the use and enjoyment of present and future generations.*

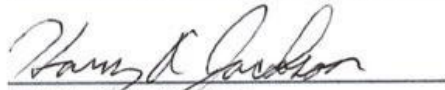
## Philosophy

In fulfilling our mission, we will: Be a recognized national leader in implementing effective natural resources conservation and outdoor recreational programs; Serve the state of Texas, its citizens, and our employees with the highest standards of service, professionalism, fairness, courtesy, and respect; *Rely on the best available science to guide our conservation decisions*; Responsibly manage agency finances and appropriations to ensure the most efficient and effective use of tax-payer and user fee resources; Attract and retain the best, brightest, and most talented workforce to successfully execute our mission.

Respectively Submitted,

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May 20, 2021



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Tim Condict  
Big Time Deer Solutions  
40 Years Ranch Consulting in Deer Nutrition and Management  
40 Years Ranch Management for Whitetail Deer and Mule Deer  
24 Years work With CWD and Disease Mitigation

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Tim Condict, Big Time Deer Solutions