



May 22, 2026

The Honorable Paul L. Foster
Chairman, Texas Parks and Wildlife Commission
4200 Smith School Road
Austin, TX 78744

Re: Public Comment on Proposed Amendments to 31 TAC §65.950 – Mountain Lion Harvest Reporting

Dear Chairman Foster,

On behalf of the Texas & Southwestern Cattle Raisers Association (TSCRA), we write in strong opposition to the Texas Parks and Wildlife Department's (TPWD or the Department) proposed amendments to 31 TAC §65.950 on mandatory harvest reporting requirements for mountain lions in Texas.

TSCRA is a 149-year-old trade association and is the state's oldest and largest livestock association. TSCRA represents approximately 28,000 individuals and businesses involved in beef production, land stewardship and the management of natural resources in Texas and the Southwest.

TSCRA represents ranchers, landowners and agricultural producers who live and work on the land every day and serve as the true boots-on-the-ground stewards of Texas' wildlife and natural resources. With more than 95 percent of Texas privately owned, the future of wildlife conservation depends upon a strong, cooperative relationship between private landowners and the Department.

This proposal threatens that relationship.

Rather than fostering cooperation and trust, the proposed rule moves the Department toward an overly burdensome regulatory approach for a non-game species that many across rural Texas will view as unrealistic, unnecessary and unenforceable. More importantly, it sends a troubling message to the very landowners and producers the state relies upon for wildlife habitat, predator management and conservation stewardship.

The Department should recognize the growing frustration among rural Texans. Policies that criminalize otherwise lawful activities by ranchers and hunters to protect livestock, wildlife, property, employees and families will not create goodwill. Instead, they risk creating resentment, distrust and defiance. If this relationship continues to erode, there is a very real risk that it could lead to locked gates and diminished cooperation between landowners and TPWD, a result that would ultimately harm wildlife conservation efforts statewide.

That outcome would be particularly damaging in Texas, where wildlife management cannot succeed through regulation alone. It depends on voluntary cooperation, mutual respect and longstanding partnerships with private landowners. Ranchers and rural landowners have long served as the backbone of conservation efforts in Texas, providing critical habitat stewardship while simultaneously producing the food and fiber that sustain our state and nation.

It is also deeply concerning that the Department appears poised to move directly to mandatory reporting despite the recommendations made by the Mountain Lion Stakeholder Group that voluntary reporting first be meaningfully attempted. To our knowledge, the only public outreach conducted by TPWD encouraging voluntary reporting was a press release issued on Nov. 25, 2024, immediately prior to the Thanksgiving holiday. No meaningful outreach campaign followed, nor were voluntary reporting materials prominently incorporated into the Department's existing mountain lion informational resources beforehand.

Many stakeholder organizations, including TSCRA, stood ready and willing to assist the Department in promoting voluntary participation and educating producers and hunters. That good-faith collaborative effort, however, never materialized. As such, claims that voluntary reporting was ineffective appear premature and disingenuous given the lack of any substantial attempt to implement or promote the proposal.

Additionally, when evaluating public comments on this proposal, we encourage the Commission to carefully consider where support and opposition are originating. Many of the strongest voices supporting these regulations are far removed from the day-to-day realities faced by rural Texans whose livelihoods are directly impacted by predator management decisions. Ranchers across this state sustain significant economic losses each year due to predators and must retain the ability to effectively protect livestock, wildlife resources, private property, employees, guests and their families.

TSCRA remains firmly opposed not only to this proposal, but also to any future effort that would impose predator hunting seasons, take limits, permitting requirements, or other predator management restrictions that impede the ability of landowners and producers to responsibly manage predators on private property.

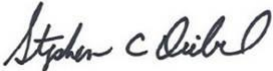
The Department should be working with producers, not against them, to maintain the cooperative relationship that has long benefited Texas wildlife and the people of this state. Preserving that relationship is far more important to the future of conservation in Texas than imposing unenforceable mandates that will only deepen distrust between rural Texans and the Department.

For these reasons, TSCRA strongly opposes TPWD's proposed amendments to 31 TAC §65.950 regarding mandatory harvest reporting requirements for mountain lions and respectfully requests that the Commission withdraw the proposed amendments.

TSCRA remains committed to supporting the Department's conservation efforts through voluntary programs, collaborative partnerships, and working relationships that recognize and respect the vital role rural Texans and private landowners play as stewards of the lands and wildlife resources of this state.

If you have any questions regarding these comments or TSCRA's position, please contact Peyton Schumann at pschumann@tscra.org or (325) 864-8802.

Respectfully,



Stephen Diebel
President

cc:

- The Honorable Oliver Bell, Vice Chairman
- The Honorable William Doggett, Commissioner
- The Honorable Anna Galo, Commissioner
- The Honorable John McCall, Commissioner
- The Honorable Robert Patton, Commissioner
- The Honorable Travis Rowling, Commissioner
- The Honorable Richard Scott, Commissioner
- The Honorable Timothy Timmerman, Commissioner
- The Honorable Lee Bass, Chairman Emeritus
- The Honorable Dan Friedkin, Chairman Emeritus
- The Honorable Greg Abbott, Governor of Texas
- The Honorable Dan Patrick, Lieutenant Governor of Texas
- The Honorable Dustin Burrows, Speaker of the Texas House of Representatives
- David Yoskowitz, Executive Director, Texas Parks and Wildlife Department
- Jonah Evans, Nongame & Rare Species Program Leader, Texas Parks and Wildlife Department
- The Honorable Charles Perry, Chairman, Senate Water, Agriculture & Rural Affairs Committee
- The Honorable Will Metcalf, Chairman, House Culture, Recreation & Tourism Committee