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February 27, 2022

Programmatic Pheasant Release EA Comments
doneill@mt.gov
Montana Fish, Wildlife & Parks
P.O. Box 200701
Helena, MT 59620

Re: Annual Release of Pen-raised Ring-necked Pheasants Draft Environmental Assessment

To Whom it May Concern:

Hellgate Hunters & Anglers (HHA) is a local, all volunteer rod and gun club based in Missoula. We represent over 400 local hunters and anglers. We write to provide comment on the Annual Release of Pen-raised Ring-necked Pheasants Draft Environmental Assessment (EA). We oppose the release of pen raised pheasants on state lands and urge the Department to choose Alternative A, the no action alternative.

Many of our members are avid bird hunters who have a vested interest in protecting the habitat (and funding) needed for healthy wild birds. Redirecting \$1 million in Department funds to the raising and release of non-native game birds — that likely cannot survive outside of domestication — is a poor use of Montana Fish, Wildlife & Parks' time and our money. Our license dollars would be much more wisely spent if allocated to habitat enhancement projects that would bolster sustainable wild bird populations for many generations to enjoy.

Pen-raised birds have an incredibly low survival rate. It is commonly understood that only four to eight percent of released pen-raised pheasants survive longer than six months. Have you ever held a game-farm raised pheasant even a few days after it was released to a put-and-take hunting area? It's breast meat is severely atrophied, it's feathers are dull and ragged, and it is weak due to starvation, because these pen-raised birds cannot learn natural behaviors to feed in the wild or to establish predator avoidance behaviors.

We do not believe this is an effective recruitment, retention, and reactivation method. It merely teaches new, young, and returning hunters what slow and sick domestic birds act like. Teaching those that are new to hunting that good habitat is the primary driving factor for healthy bird numbers is a much better return on investment. Additionally, weak pen-raised birds can also present dangerous shooting conditions for inexperienced shotgun handlers when birds fly low and close to bird dogs and other hunters.

If the legislature is actually interested in developing a profitable venture, the domestic breeding of birds as a revenue source is of interest to numerous private, year-round hunting preserve and dog training interest groups. We advocate for keeping these efforts separate from licensed hunting and R3 opportunities.

Montanans have the incredible opportunity to pursue strong, sustainable populations of upland game birds statewide. HHA strongly encourages Fish, Wildlife & Parks' leadership, staff, and commissioners to continue to invest funding into the places that support these species and not expensive, one-off farmed birds that are far more likely to end up as a coyote snack than in a hunter's bag. Again, we urge the Department to choose Alternative A, the no action alternative.

Thank you for the opportunity and for your thoughtful consideration of our comments. These statements are representative of many dedicated bird hunters raising and teaching the next generation of hunters.

Sincerely,

A handwritten signature in black ink, appearing to read "Walker Conyngham". The signature is fluid and cursive, with a long horizontal stroke at the end.

Walker Conyngham
President
Hellgate Hunters & Anglers