

MONTANA FISH, WILDLIFE & PARKS
PUBLIC COMMENTS FOR THE 2021 PHEASANT RELEASE PROGRAM
FINAL EMAIL COMMENTS PROCESSED AS OF JULY 27, 2021

1. Dear FWP Commissioners and Director Worsech,

Please see attached for the Montana Chapter of Backcountry Hunters and Anglers official comments on the pheasant release program.

Sincerely,

Paul Kemper

Montana Chapter Backcountry Hunters and Anglers

2. HELLO, dept of Fish, wildlife and parks,

The gallatin valley chapter of pheasants forever would like to comment on the proposed pheasant release proposal. Please accept the following attachments as our chapter comments on this proposal. Thanks, so much,

Sincerely,

Jim Hoschouer

GVPF chapter president



**BACKCOUNTRY
HUNTERS & ANGLERS**
MONTANA

July 27th, 2021

Montana Fish, Wildlife & Parks

Commissioners: Lesley Robinson, Brian Cebull, KC Walsh, Pat Byorth and Pat Tabor

Director: Hank Worsech

1420 East Sixth Avenue

Helena, MT 59620

Dear FWP Commissioners and Director Worsech:

The Montana Chapter of Backcountry Hunters & Anglers represents some 3,000 dues-paying Montana members who care deeply about public fish and wildlife habitat, public access, and fair chase hunting and fishing practices.

We remain disappointed by the legislative mandate to appropriate up to \$1,000,000 on pen-raised pheasant stocking efforts. As you know, pen-raised pheasants have a tragically low survival rate; they are hyper-vulnerable to predators and cannot thrive the way wild birds can under the right habitat conditions.

However, since these dollars must go toward raising and releasing birds instead of improving habitat for wild birds to thrive, we believe the scope of these efforts should be kept narrow and focused. It is imperative that we keep these manufactured opportunities separate from the established upland game bird seasons and done in a way that minimizes crossover between pen-raised pheasants and our wild bird populations.

Additionally, we ask that Fish, Wildlife and Parks manage these releases and corresponding harvest opportunities in a way that offers increased success and opportunity for youth while not allowing these manufactured opportunities to replace or supplement wild bird hunting opportunities for the general hunting public. Historically, youth hunter success rates have been low during the youth pheasant season, and releasing pen-raised birds may be a valuable tool to help youth find early success.

Outside of youth opportunities, it is our opinion that hunting should remain a fair-chase challenge, and wild birds and their habitat should remain the priority.

Sincerely,

Paul Kemper

Board Member | R3/DEI Leader

Montana Chapter Backcountry Hunters & Anglers



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MONTANA@BACKCOUNTRYHUNTERS.ORG

23 July 2021
3575 Pasha Lane
Bozeman, MT 59718

Dear Members of the Montana Fish, Wildlife, & Parks Commission:

The Gallatin Valley Chapter of Pheasants Forever thanks you for fostering fish and wildlife management in Montana. We hope that you recognize the backing that Pheasants Forever provides to you in this regard, and we look forward to offering even more support for the scientific management of upland gamebirds in our great state.

We appreciate the opportunity to provide comments on pheasant stocking prior to your upcoming meeting on 27 July 2021. From <https://fwp.mt.gov/homepage/news/2021/june/0629-fwp-seeks-comment-on-several-wildlife-related-proposals> :

“PHEASANT RELEASES

Since 1987 FWP has administered a pheasant release program, whereby landowners or pheasant producers raise and release pheasants for population enhancement and expanded public hunting opportunity. Private landowners are reimbursed through the Upland Game Bird Enhancement Program (UGBEP). For fall 2021, FWP is proposing the purchase and release of pen-reared pheasants on private lands for population enhancement purposes, as well as state wildlife management areas for hunter recruitment purposes. These releases are intended to expand hunting opportunity on private lands and to be used as a young hunter recruitment tool during the youth weekend pheasant hunting season. The specific locations where pheasants will be released is still being determined, so FWP is seeking programmatic approval for pheasant releases in suitable locations.”

We support the use of stocking only for hunter recruitment and retention programs, especially in organized youth programs. Our Chapter has been involved in such efforts with local and regional bird dog clubs. Although such hunting opportunities for stocked birds is very artificial, it is often needed to pique the interest of new hunters.

However, the use of birds raised on pheasant farms to augment local pheasant populations is against the national policy of Pheasants Forever, and we do not support it. That policy fits the present situation in Montana perfectly, and we do not support the use of game farm pheasant for “population augmentation purposes”. The following is from: <https://www.pheasantsforever.org/Habitat/Pheasant-Facts/Pheasant-Stocking.aspx> .

***PHEASANT STOCKING
AN INEFFECTIVE MANAGEMENT TOOL***

Stocking of pen-raised birds is not an efficient means to increase wild bird populations, as shown by numerous studies over the past 25 years. Developing and enhancing habitat, on the other hand, has proven to help increase ring-necked numbers.

WHAT IS PHEASANT STOCKING?

By definition, "stocking" is the release of pen-raised pheasants into habitat where wild birds already are present. "Introductions" or "transplants" are different. These refer to the capture and release of wild birds into areas where birds are not generally present, using management that has been studied very thoroughly.

WHAT ABOUT STOCKING YOUNG (8-14 WEEKS OLD) PHEASANTS?

On average, only 60 percent will survive the initial week of release. After one month, roughly 25 percent will remain. Winter survival has been documented as high as 10 percent but seldom exceeds 5 percent of the released birds

WITH HIGH MORTALITY RATES, SHOULDN'T WE CLOSE THE SEASON?

For the most part, hunting has little to do with poor survival. Predators take the real toll on pen-raised pheasants, accounting for more than 90 percent of all deaths. The reason being pen-raised birds never had a chance to learn predator avoidance behavior. Starvation can also be a problem. Some newly-released pheasants take up to three weeks to develop optimal foraging patterns essential to survival in the wild.

WHY NOT WAIT UNTIL SPRING TO RELEASE BREEDER HENS?

Mortality is still very high- roughly 40 to 70 percent of the hens will perish before attempting to nest. Also, high mortality rates continue even after nests are initiated or eggs successfully hatched, resulting in dismally low production. The average production of spring-released hens ranges from 5 to 40 chicks per 100 hens released. Thus, released hens are not productive enough to replace their own losses.

CAN'T SURVIVAL RATES BE DIFFERENT FOR SOME AREAS?

There often will be a few that make it, but studies have shown they are unable to maintain a population. This is why local stocking programs continue year after year. Ultimately we must ask ourselves why there is a need to repeat stocking efforts on an annual basis if survival is as high as often claimed.

ISN'T MINIMAL SURVIVAL BETTER THAN NONE AT ALL?

Not necessarily. We're concerned about a self-sustaining population that we won't have to continually supplement with pen-raised birds. In order to remain at a constant level, wild pheasant populations must have a production rate of roughly four chicks (surviving to 10 weeks) per hen. With production rates of less than one chick per hen, a population would decline rapidly.

STOCKING WORKED INITIALLY, WHY WOULDN'T IT WORK NOW?

When pheasants were first transplanted (different than stocking) and introduced to the U.S., the landscape was far different from the one we have today. Farming techniques were primitive, field sizes smaller and crops more diversified. These habitat conditions created a situation ideally suited for the introduction of a farmland species like the ring-necked pheasant.

IS THERE HARM IN RELEASING BIRDS?

Though not proven, there is cause for concern. Genetic dilution may be occurring. Even with minimal survival, the release of thousands of pen-raised birds over many years may be diminishing the "wildness" of the wild stock. Another concern is that, by releasing hundreds of birds in a given area, predators may start keying on pheasants. This may result in wild birds incurring higher predation. Finally, there is the potential of disease transmission from released birds to the wild flock.

WHAT IF I JUST WANT TO PUT A FEW MORE BIRDS IN THE BAG

Simple enough. Release the birds as close to the time you want to hunt as possible. To do otherwise is a waste of money. Pen-raised birds do provide shooting opportunities and a chance to keep your dog in shape. Just keep in mind that these birds are not going to produce a wild self-sustaining population in your area.

IS THERE HOPE FOR AREAS WITH LOW PHEASANT POPULATIONS?

Yes. Start by understanding pheasant habitat needs. What kinds of areas do pheasants nest in? What are optimal covers in which they survive harsh winters? How can these areas be created and preserved? The answers can be learned from your local wildlife professionals. Consider becoming a member of Pheasants Forever. Informative and educational articles on these and other subjects are part of every Pheasants Forever Journal of Upland Conservation. If you are serious about improving local habitat conditions, consider joining or forming a local chapter.

WITH IMPROVED HABITAT, WHERE WILL PHEASANTS COME FROM?

Because of their high productivity, wild pheasants in the area can quickly populate newly-created habitats. In unpopulated areas of suitable habitat, transplanting wild birds or their offspring (F1 generation) appears to be the best solution. The first step should be an investigation of factors that have limited pheasant populations in the past- for example a lack of winter habitat or increased pesticide use.

CAN WE REALISTICALLY REBUILD WILD PHEASANT NUMBERS?

Yes. During the past 50 years there has been a colossal amount of money spent on supplemental stocking programs by state and local governments, sportsmen's groups, and private individuals. If these dollars would have been invested in habitat restoration, hundreds of species of wildlife in addition to pheasants would have been benefited.

Here's the bottom line: When habitat conditions improve, wild pheasant populations will increase in response to that habitat.

Based on the “bottom line” as stated above, we do not support using any hunter dollars for stocking pheasants. Upland gamebird funds should be dedicated to habitat development, preservation, program evaluation, and providing public access for bird hunting. It is clear from our experience that there is a surplus of opportunities to collaborate with private landowners to do so. The only limiting factor is funding. Any shift of funding from habitat programs to stocking is ill advised.

If FWP is directed to use any funds from any source for “population augmentation purposes”, it is imperative that an equivalent amount of funding be provided to conduct scientific evaluation of such program(s). An unbiased university research program like that of the Montana Cooperative Wildlife Research Unit would be ideal. Using up-to-date adaptive management methods for such a project is strongly recommended, and the Upland Gamebird Enhancement Program Council should be engaged in leading all such efforts.

Several years ago, James Wooley, Retired National Biologist for Pheasants Forever, prepared a literature review of stocking programs. He found no evidence to support the stocking of game farm pheasants for wild population augmentation. Please find that review attached. Also attached is a popular article from Pheasants Forever summarizing our current knowledge of pheasant stocking programs.

Thank you for the opportunity to comment.

Sincerely,
Jim Hoschouer
President, Gallatin Valley Chapter, Pheasants Forever

Richard Sojda
Habitat Chair, Gallatin Valley Chapter, Pheasants Forever



STOCKING PHEASANTS—STILL IN DEMAND, STILL FUTILE

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When Kevin Lines started work at the Minnesota Department of Natural Resources 40 years ago, he raised pheasant chicks to dole out to 4H, FFA, and sportsmen's groups in exchange for their work on pheasant habitat work.

"For every type of project they could get so many day-old pheasant chicks to keep and raise and release in their project areas," says Lines, now the DNR's Pheasant Action Plan coordinator.

The pheasant giveaway was a great success in encouraging community projects. It was not successful in increasing pheasant numbers.

"There's literally no information out there that says by using game farm birds you can stock and build a wild population," says Lines. "They don't last long."

What Lines is saying is old news to wildlife professionals and common knowledge among a lot of conservationists and modern-day sportsmen. But wildlife officials still hear demands to build struggling pheasant numbers by "stocking more birds."

"All the time," says Travis Runia, senior upland game biologist for the South Dakota Department of Game, Fish and Parks. Even in the number one pheasant state in the country, where wild birds number in the millions even in poor years, "there are certain folks that if their bird numbers are struggling, they will release birds," says Runia. "We know it really doesn't contribute much, but it does happen."

Two studies that compared the survival of pen-raised stocked birds to wild birds illustrate just how futile pheasant stocking can be.

In a study by the Idaho Department of Fish and Game, researchers released banded and radio-collared wild birds (trapped elsewhere) and pen-raised birds in two areas in southern Idaho where wild bird numbers were low. The scientists also tested the effectiveness of trapping and removing magpies, skunks, coyotes, mink and other predators from the areas.

In a paper published in *Wildlife Biology* in 2009, the Idaho scientists reported that "wild female pheasants were seven times more likely to survive translocation to Oct. 1, 10 times more likely to survive to the nesting season, [and] eight times more productive." Predator control aided survival of wild roosters released, but didn't seem to help either wild or pen-raised hens. According to the study, "Low survival, poor productivity, and higher costs of spring--released pen--reared female pheasants strongly suggest that this is an inappropriate management tool for increasing pheasant numbers."

A South Dakota study published a decade earlier in *The Journal of Wildlife Management* showed similar results. Anthony Leif of the South Dakota Department of Game, Fish and Parks radio-collared and released 44 wild hens and 159 pen-raised hens in two areas in eastern South Dakota. While most wild hens survived through the study period, the pen-raised hens were easy pickings for predators. Additionally, the wild hens

were ten times as successful at raising broods. Leif concluded, "Because of low survival and reproductive rates, pen-reared hens should not be released in habitats containing wild pheasants."

None of that is news to Runia.

"Same information I'm going to share with you here. If you follow 100 wild hens through the nesting and brooding season, you'd expect them to raise about 30 broods. And if you released 100 hens—pen-raised birds—in the spring, you'd expect to get three broods. That's the major take-home message from that study," says Runia.

"Just think about a bird that's lived in a cage and been given food, water and protection from predators," he says. "They really don't have that innate fear of predators like a wild bird would have. Then, you think about a bird that was raised in the wild—they have to be constantly on the lookout for predators, or they're dead."

For that reason, South Dakota—like most states with abundant wild pheasants—doesn't stock birds, even in poor years. Runia states, "We're certainly going to concentrate on efforts to increase habitat, which is proven to produce pheasants."

Does it ever make sense to stock pheasants?

Bird stocking does support successful hunting programs where wild birds don't live. "Without it [stocking], you'd be looking at all the New England states not having a program at all," says Laurie Fortin, coordinator of pheasant hunting program for the Connecticut Department of Energy and Environmental Protection.

Connecticut is a perfect example, stocking birds to hunt since the 1880s. The state currently releases about 15,000 birds a year in small public areas managed for grassland species. Birds are usually dropped off only one or two days before hunting begins.

"We try to do it as close to opening day as possible because predation is always a factor," says Fortin. "Birds moving off the area is always a factor. The sooner we can put them out prior to opening day, the better." About 5,000 hunters put down \$28 for a special stamp to hunt. They manage to find and shoot perhaps half of the birds that are stocked. Birds cost about \$13 apiece.

But even a successful program of put-and-take hunting proves the rule that stocking can't build wild pheasant populations. In Connecticut, which has no wild pheasants, none of the stocked birds have ever survived long enough to start a wild population—or even to provide a meaningful contribution to hunting the next year.

"On very rare occasions someone might see a breeding bird with chicks—very rare," says Fortin. "By the next fall, there's literally not a single bird left."

Story by Greg Breining

Photo courtesy of the Wisconsin Department of Natural Resources



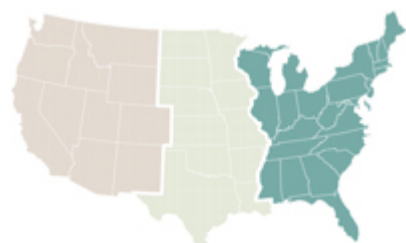
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Literature on Survival of Pen-reared Game Birds Released into the Wild

- Idaho (2009).** Compared vital rates of two different (pen-reared and wild) ring-necked pheasant stocks and assessed effects of predator control on these pheasants released into current range. Wild (31 males and 112 females) and pen-reared (230 males and 1,059 females) ring-necked pheasants were released in spring into two areas in southern Idaho during 2000–2001 to augment low resident populations. **Wild female survival from March to October was significantly greater than that of pen-reared females in both 2000 (40% vs 4%) and 2001 (43% vs 8%).** During 2001, predators were removed within our study areas. Survival did not increase for either stock of female pheasants after predator removal. **Predator control did not increase the number of hens surviving to reach the nesting season (1 May), nesting rate or nest success.** Wild female pheasants were seven times more likely to survive translocation to 1 October, ten times more likely to survive to the nesting season, eight times more productive, and one-third as expensive per egg hatched than pen-reared females. **Low survival, poor productivity and higher costs of spring-released pen-reared female pheasants strongly suggest that this is an inappropriate management tool for increasing pheasant numbers** (Wildl. Biol. 15:80-88).
- Nebraska (2008).** The Surrogator™ captive propagation system is purported to significantly increase populations of northern bobwhite and ring-necked pheasants. The units provide food, water, heat, and shelter for chicks until they are released. Releasing pheasant chicks at 4-5 weeks and limiting contact with humans while they are in the Surrogator unit is purported to allow the chicks to retain the survival instincts of wild birds. We evaluated the efficacy of the Surrogator system by evaluating the survival and return-to-bag of pheasant chicks raised in the units placed on 2 shooting preserves and 2 public WMAs. **Survival from release until the start of the pheasant hunting season was low (12%) and annual survival was less than 1%. Of the 170 pheasant chicks placed in the unit at the beginning of the study, 6 (3.5%) were returned to bag** (NE Game & Parks Special Report).
- Georgia (2005).** Private managed hunting plantation. A total of 1,641 five-week-old wing-tagged pen-reared bobwhites were released using the Surrogate Propagation™ system during June, August and September; and 1,000 12-16 week old leg-banded bobwhites were "dump released" during November. Birds were liberated into intensively managed pine savanna habitat that included supplemental feeding and predator control. A total of 93 birds were harvested of which only 13 were wing banded Surrogator birds. **In this study the Surrogate Propagation™ release system alone did not result in the establishment of a sufficient number of "coveys" to meet the shooting objectives of the landowner. In fact, when the land manager conducted an informal bird dog census during early November, after the Surrogate Propagation™ releases, only five "coveys" were located. At that point the decision was made by the landowner prior to hunting to supplement the population with more dump-released birds than originally planned** (Georgia DNR Special Study).
- Kentucky (2007-2009).** Study conducted by the Kentucky Department of Fish and Wildlife Resources. In 2007, 294 birds were released using the Surrogate Propagation™ system at a research farm. **The farm was hunted gaggessively during the 2008-09 season, with no birds flushed or harvested. In 2009, KDW released 277 birds at the same site. Covey call counts were conducted on the property during October; with 1 covey detected. In mid-November, 5 hunters using 5 dogs hunted 2 hours with no birds flushed or harvested. At a second release site where no hunting was allowed, no birds were detected during Oct covey call counts, flush counts, or in call back pens.**
- South Dakota (1990-92).** Released 44 wild and 159 pen-reared hens on public lands with excellent habitat during April to augment natural reproduction. Hens were followed for 181 days, through the nesting season, by radio telemetry. **Only 8% of pen-reared hens survived the nesting season verses 55% of the wild hens. Predation accounted for 90% of pen-reared hen losses.** Pen-reared hens contributed little to nesting, because few lived long enough to hatch a nest. **On average 100 wild hens produced 34 broods, 100 pen reared hens produced 3 broods** (J. Wildl. Manage. 58:501-6).
- England (1982-85).** Large releases of pen-reared hens in the fall of each year showed that **pen-reared hens were 3x more vulnerable to predation than wild hens, and that wild hens were 4x more productive then pen-reared hens** (J. Wildl. Manage. 52:446-450).
- Iowa (1977-79).** Released 2,510 hens on 3 study areas to increase populations. Subsequent analysis by winter flush, roadside, and crowing counts showed no increase in local populations. **Populations on the 3 study areas fluctuated similar to populations on nearby areas that received no stocking** (IA P-R Comp. Rpt. 16pp).

- Oregon (1972-73).** Released 335 pen-reared hens on public land in early April. Nearly all had disappeared within 40-50 days of release. **Only 17 known young were produced from 335 pen-reared hens released. Wild hens (61) on the area produced 378 young during the same time period** (Northwest Sci. 50:222-230).
- Nevada (1972-73).** Released 60 birds in April to augment natural reproduction followed by radio telemetry for 80 days. Recorded 63% mortality, 30% which occurred in the week following release. Most of the mortality 63% was due to predators. **None of the hens successfully hatched a nest.**
- Minnesota (1967).** Released 74 hens and cocks in August and followed movements for 28 days by radio telemetry. Sixty birds or **81% died by day 28.** Mortality was mostly predation (55%) (J. Wildl. Manage. 34:267-274).
- Illinois (1983-85).** Wild bobwhite quail were shown by electrophoresis of blood samples to have greater genetic variability than game farm stock. The lower genetic variability among game farm birds is likely related to inbreeding and make-up of the founding game farm stock. **Low survival and poor fitness of game farm quail may be partially attributed to the loss of genetic diversity.**
- Tennessee (2002-03).** Genetic assessment of pen-reared Northern Bobwhite releases on Ames Plantation K. O. Evans, M. D. Smith, L. W. Burger Jr., R. Chambers, and A. E. Houston, and R. Carlisle. In response to low encounter rates with wild northern bobwhites (*Colinus virginianus*; hereafter, bobwhites) during bird dog field trials at Ames Plantation in Tennessee, a large-scale release program of pen-reared bobwhites was implemented in the fall of 2002. To evaluate potential genetic effects of pen-reared releases on wild populations, we monitored survival of pen-reared and wild bobwhites from fall release of pen-reared bobwhites through the breeding season. We used genotypes from 6 polymorphic microsatellite loci to measure genetic diversity and conduct population assignment tests. Genetic diversity, number of alleles, and allelic richness were greatest in the wild, intermediate in the F1 generation, and lowest in the pen-reared populations. In some years, some pen-reared birds will survive to the breeding season and successfully reproduce with wild birds. **Given that pen-reared and pen-reared x wild birds have reduced genetic variability relative to locally adapted wild birds, large-scale releases of pen-reared bobwhites may result in negative impacts on the genetic integrity of resident wild populations.**
- Texas (2009-10)** Evaluating the use of Surrogators for raising Northern Bobwhites. Dean Ransom, Jr., Research Scientist, Rolling Plains Quail Research Ranch (abstract from RPQRR newsletter (www.quailresearch.org). In 2009, RPQRR began a study to determine post-release survival of Surrogated bobwhites at two sites in Texas (Palo Pinto and Clay County). We radio-tagged and leg banded approximately 80 5-week old chicks at the Palo Pinto site and approximately 40 chicks at the Clay County site. Most of the tagged birds were dead or lost by the second week post release. In 2010, we tagged 27 birds at a third site in Palo Pinto County, and found similar results, that being extremely high mortality of tagged birds within 2 weeks post-release. Visual observations of bobwhites without transmitters suggest that similar mortality was occurring. **Based on our results to date, landowners utilizing Surrogators to enhance the existing bobwhite population or re-establishing populations in unoccupied ranges should expect poor survival and low success in achieving their goals.**

Compiled by the Iowa Department of Natural Resources and Pheasants Forever – 2010 and 2011.

Further Abstracts of Stocking Studies

- Baxter, W. 1984.** Nebraska Dept. Game, Fish & Parks. Personal communication. The recovery rate from banded game-farm pheasants released in Nebraska was about 5%.
- Berner, A. 1974.** Evaluation of F₁ pheasant stocking for repopulation purposes. Minnesota Dept. Nat. Resour. Wildl. Res. Quarterly Rpt. 33:268-274. Two years after being stocked with pheasant chicks at a rate of 36 hens and 6 cocks per section, both treatment and control areas were not significantly different from each other in numbers of pheasants present (as was the case before stocking). Chicks were 8-week-old progeny of wild birds trapped the preceding winter. Four township sized areas were stocked, and a total of 3,000 birds were liberated.
- Berner, A. 1975.** Evaluation of efforts to increase pheasant numbers in Douglas County by the Viking Sportsmen's Club. Minn. Wildl. Res. Quarterly Rpt. 35:5-14. Roadside counts in 1973 and 1974 show that pheasant populations along stocked treatment routes (Douglas County) are significantly greater than along the control routes (Pope and Grant Counties) both in spring and fall. Significantly more pheasants are released along treatment routes than along controls. The difference has a significant effect on the fall population but not on the breeding population of the treatment area. About 8,000 pheasants were released in fall 1973.

- Besadny, D. C. and F. H. Wagner. 1963.** An evaluation of pheasant stocking through the day-old chick program in Wisconsin. Wisconsin Cons. Dept. Tech. Bull. 28. 84pp. Average production was calculated to be 0.2 to 0.4 young cocks/hen stocked under the day-old-chick program. This low production figure resulted because few hens survived to the breeding season. Thus, there was no long-term benefit to the wild pheasant population from stocked hens. Hens were stocked the previous fall at about 12 weeks of age.
- Burger, G. V. 1964.** Survival of ring-necked pheasants on a Wisconsin shooting preserve. *J. Wildl. Manage.* 28:711-721. Burger released 5,441 ring-necked pheasants over a three year period; of these, 50 percent were harvested, 13 percent were found dead and 8 percent were estimated to have survived until the following spring.
- Cary, D. C. 1983.** The adaptability of Iowa ring-necked pheasants to northern Missouri. Final Rpt., Fed. Aid Proj. W-13-R-36 (1982). Missouri Dept. Cons., Jefferson City. Iowa F₁ ring-necked pheasants have been used successfully to populate areas of favorable habitat in northern Missouri.
- Ellis, J. A. and W. L. Anderson. 1963.** Attempts to establish pheasants in southern Illinois. *J. Wildl. Manage.* 27:225-239. Limiting factors to released pheasants revolved around survival rather than reproduction. Survival of trapped and released wild pheasants was greater than game-farm birds, but less than resident wildlife populations.
- Farris, A., E. Klonghan and R. Nomsen. 1977.** The ring-necked pheasant in Iowa. Iowa Cons. Comm., Des Moines. 147pp. "[From pen-reared, stocked birds] it is not uncommon to find return rates of only 1 or 2% and 10% is about the maximum to be expected under the best conditions." Stocking in southeast Iowa with standard, pen-reared game-farm stock (680 birds) released near Packwood indicated a nearly complete loss by the second year following liberation. In contrast, mass liberation (700-5,000/site) of F₁ stock was successful where adequate habitat existed, but no resident populations were present.
- Feldt, R. D. 1965.** A study to determine the reproductive, longevity, and survival characteristics of mass released ring-necked pheasants in areas without a native population. Indiana Dept. Cons. Wildl. Res. Dept. 26(1):81-94. Feldt released 1,000 to 1,500 game-farm pheasants on each of 4 study areas, largely uninhabited by ring-necks during the spring of Year 1. They reproduced, to what extent is unknown, and a recognizable population was present for the next 2 years of the reporting period. However, these efforts did not produce self-sustaining populations.
- Hartman, F. and W. Shope. 1981.** Mass release of game-farm pheasants into second-class range in Pennsylvania. *Trans. NE Sect. Wildl. Soc.* 38:144-150. Three areas in Pennsylvania's second class pheasant range received stockings of banded and backtagged game-farm pheasants for 2 consecutive years. The stocking rate each year was 25 cocks and 250 hens in the Washington and Drums study areas and 50 cocks and 500 hens in the Sugarloaf study area. Mortality of game-farm pheasants was high, especially the first 2 months after release. Pheasant population levels did not increase, and the contribution of these spring stockings to fall hunting was insignificant. Game farm pheasant mortality exceeded 67% on all areas by 1 month following release, and stockings were not successful.
- Hessler, E., J. R. Tester, D. B. Siniff and M. M. Nelson. 1970.** A biotelemetry study of survival of pen-reared pheasants released in selected habitats. *J. Wildl. Manage.* 34:267-274. Eighty-one percent of 74 radio-equipped pen-reared pheasants released in Minnesota died within 28 days of release (predation was a main limiting factor).
- Jarvis, R. L. and J. Engbring. 1976.** Survival and reproduction of wild and game-farm pheasants in western Oregon. *Northwest Sci.* 50:222-230. Released Oregon game-farm pheasants contributed little to wild populations. Nearly all game-farm hens released in the Willamette Valley disappeared within 40 days following release. Further, only 17 young were known to have been produced by 335 females released during the two year study. Wild hens for the same period (61 birds) produced 378 young.
- Kabat, E., F. M. Kolik, D. R. Thompson and F. F. Wagner. 1955.** Evaluation of stocking breeding hen and immature cock pheasants on Wisconsin public hunting grounds. Wisconsin Cons. Dept. Tech. Wildl. Bull. 11. 58pp. The production estimates show that each spring-released hen pheasant contributed on the average less than one young bird to the fall population on each of the study areas, and only a half a cock or less. About two-thirds of the spring-released hens, therefore, failed to survive to the time when the summer observations were made.
- MacNamara, L. G. and E. L. Kozicky. 1949.** Band returns from male ring-necked pheasants in New Jersey. *J. Wildl. Manage.* 13:286-294. MacNamara and Kozicky found less than one percent return on pen-reared pheasants from the first to the second hunting season, based on band returns of 27,592 birds in New Jersey.

- May, J. F. 1973.** Survival of pen-reared ring-necked pheasants released in southeast Iowa. M.S. Thesis, Iowa State Univ., Ames. 121pp. Fall release of 2,465 F₁ generation pheasants was made in September and October 1970. Birds were concentrated within 2 miles of the release site, but ranged up to 21 miles away. The stocking resulted in a good population within 3 miles of the release site the first year with slight expansion the next year. (Habitat condition on the areas was somewhat favorable – 70% rowcrops, 8% pasture, 6% hay, 16% idle and other uses).
- Morse, W. B. 1951.** Summary of pheasant survival studies. Oregon State Game Comm. Bull. 6(10):4 & 6. "Game farm breeding stock liberated late in the laying season will nest and rear some young, but production is low. (6.5 eggs and .4 young per hen surviving through October.)"
- Pheasant Stocking Study Committee. 1961.** An evaluation of and recommendations for ring-necked pheasant artificial stocking programs in Ohio. Ohio Div. Wildl. "Evaluations of spring stocking done in New York state showed that only about one of five spring released hens produced a brood. Over a two-year period 140 hens contributed an estimate 162 young to the fall population, or just slightly more than one young per hen released. It appears that Ohio also realized about one young bird in the fall population for every hen released in the spring."
- Rybarczyk, W. and J. B. Wooley, Jr. 1983.** Evaluation of supplemental pheasant stocking in three isolated areas of potential habitat. Comp. Rpt., Proj. No. W-115-R, Study No. 1. 16pp. Over 2,500 female F₁ generation pheasants were released at three sites in northern Iowa in October, 1978 and 1979. Winter flush counts, spring crowing and roadside counts, and summer roadside counts were utilized as indices to the pheasant populations at the release sites. Stocking of female F₁ generation progeny did not significantly increase the populations on any of the three release sites. Populations on the release sites fluctuated in the same pattern that occurred with pheasants on surrounding private land where no birds were stocked. August roadside counts on all three study areas were significantly correlated with August roadside routes from the entire Cash Grain Region. Wild cocks were present in sufficient numbers for reproduction without stocking. Pheasant stocking in Iowa is not recommended in the future unless sufficient vacant habitat exists that is spatially removed from existing populations. Possible alternatives to increase pheasant numbers in northern Iowa are proposed.
- Solomon, K. 1984.** South Dakota Dept. Game, Fish & Parks. Personal communication. First winter survival of pen-reared, game-farm pheasants in South Dakota calculated from band returns ranged from 6.4-10%.
- Tripp, L. 1984.** North Dakota Game & Fish Dept. Personal communication. The recovery rate from banded, game-farm pheasants released in North Dakota was about 4%.
- Wilcomb, M. S. 1956.** Studies in wildlife management: Fox populations and food habits in relation to game bird survival, Willamette Valley, Oregon. Agr. Exp. Sta., Oregon State Coll., Tech. Bull. No. 38. 16 pp. Wilcomb, in his study of fox predation on ring-necked pheasants released 95 game-farm birds in 2 releases. The last known survivor of the first release (50 birds) was recovered after 59 days and the last survivor of the second release (45 birds) survived 120 days. The behavior of these birds indicated that they were less fit to survive than pheasants reared in the wild.

Prepared by: James B. Wooley, Jr.
Wildlife Research Biologist
Iowa Conservation Commission, 1984

For document file, email wooley@pheasantsforever.org



To: Pheasants Forever and Quail Forever Chapters
Re: "Surrogators™", and PF & QF Stocking Policy

This has been a difficult year for pheasants and quail, and questions are again being asked about the use of PF/QF chapter funds to purchase "Surrogator™" bird rearing units offered by Pheasant Restoration and Quail Restoration Technologies (PRT/QRT). The Surrogator™ is promoted by PRT/QRT as the "next generation in game bird restoration", and "proven to be the most effective means to restore quail and pheasant numbers." Game farm-produced, pheasant or bobwhite quail chicks are placed into the device (which acts as a brooder house) at a few days of age and then are released at about 4-5 weeks of age.

The method employed in using the Surrogator™ is unambiguous—it is simple stocking of game-farm pheasants and quail. That, of course, is the problem. Decades of scientific studies have shown that stocking game farm birds is not effective in restoring and maintaining wild bird populations. Indeed, recent scientific studies, including those with Surrogators™, have returned results showing that survival of liberated game farm birds is so low that the practice is completely without merit (see the appended studies). PRT/QRT advertised for a short time in PF and QF Magazines and websites some years ago. In fact, upon examining these products and the methods they employ, we terminated our advertising and sponsor relationships with PRT/QRT because of our commitment to wild upland game birds, habitat, and scientific wildlife management. We do not endorse these products or their claims.

At PF and QF, we have only a small number of very well thought out operational policies for chapters to follow—and, one of the most important is the prohibition against stocking game farm birds. The reason for the restriction is very simple—this quick-fix, band-aid approach to upland bird restoration is not only ineffective, it is inherently dangerous because of potential disease introduction and possible dilution of genetic diversity in wild populations in the release area. Thus, our Mission at PF and QF remains focused on the proven methods that do work—habitat establishment and management.

Pheasants (and Quail) Forever's straightforward stocking policy was established over 20 years ago. It states that "Pheasants Forever (Quail Forever) prohibits any form of stocking by chapters except monetary donations to state wildlife agency-sanctioned programs for release of F1 generation or wild-trapped game birds into areas of suitable habitat, or for state agency-sponsored research purposes." The policy further "specifically prohibits sponsorship with Pheasants Forever (Quail Forever) funds for stocking-before-the-gun programs, public or private." Stocking game-farm birds is a bad investment of funds that could be better employed for wildlife. There are no long term benefits to be gained. We strongly discourage the use of all artificial means that rely on release of game farm stock to restore or supplement wild populations of pheasants or quail. Chapter purchase, sponsorship, or use of Surrogator™ units or others like them is not permitted.

We encourage our Pheasants Forever, and now Quail Forever chapters to continue their work in the manner that has proven effective over 25+ years of successful operation. Please focus on the long term horizon and invest your time, funding and effort in habitat preservation, establishment and management. That alone remains the key to wildlife restoration.

Thank you so much for your selfless efforts on behalf of wildlife.

From: [Nick Gevock](#)
To: [FWP Commission](#)
Subject: [EXTERNAL] MWF comments on pheasant stocking program
Date: Tuesday, July 13, 2021 11:17:33 AM
Attachments: [MWF comments on pheasant stocking.pdf](#)

Dear Fish and Wildlife commissioners,

Please accept these attached comments on the pheasant stocking program.

Sincerely,

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[Nick Gevock](#)
Conservation Director
Montana Wildlife Federation
PO Box 1175
Helena, MT 59602
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Protecting Montana's wildlife,
land, waters and hunting & fishing
heritage for future generations.

July 13, 2021

Lesley Robinson, Chair
Montana Fish and Wildlife Commission
1420 E. Sixth Ave.
Helena, MT 59624

RE: Comments on pheasant stocking program

Dear Chair Robinson and Commissioners,

The Montana Wildlife Federation opposed HB 637 for the numerous bad provisions it included for our fair chase hunting traditions, equal opportunity for everyone to hunt, and for the numerous special interests who it favored. We offer the following comments on the portion of the bills that requires pheasant stocking using hunter dollars.

Stocking of raised pheasants is expensive, inefficient and a big waste of public money that would be far better spent on habitat enhancement and other measures to promote wild upland game birds. This is not the message we want to send to youth as we work to recruit the next generation of ethical, fair-chase hunters. In fact, Montana stopped this program in the past over concerns about this type of hunt, and whether it was a good use of hunter dollars.

The proposal doesn't specify whether these birds will come from the state prison system, yet the program was sold as a benefit for inmates. We need to see an accounting of the cost per bird. Finally, we should consider the potential for disease transmission from pen-raised birds to our wild pheasant population, and stock accordingly to try to minimize contact between these birds and wild pheasants.

Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in black ink that reads "Tom Puchlerz". The signature is written in a cursive style with a long, sweeping tail on the letter "z".

Tom Puchlerz
Board President

Name:	City/Town:	State	Comment
CHRIS HYLE	Butte	MT	I fully support the release of pen raised pheasants as both a population supplement and to enhance hunter recruitment.
Jared Ryan	Helena	MT	I support pheasant release
Jonathan Haufler	Seeley Lake	MT	Pheasant release programs have been repeatedly shown to be simply put and take activities and to do little to increase pheasant populations beyond a very short window after releases occur. They may provide for short term "hunting" opportunities with enhanced encounters with released birds in small areas including opportunities for training bird dogs. However, if the desire is to increase pheasant populations, money would be much better spent on habitat incentives or improvements. In particular, releasing pheasants on private lands does nothing but provide short term put and take pheasant "hunting" for the private landowner or their guests, and does nothing for the general hunting population. I recommend that other than possible releases at established public hunting locations where new hunters may be introduced to "hunting" with an increased chance of encountering a bird, that no pheasant releases be funded. Spend this money on other bird habitat enhancement programs.
Dean E Waltee	Butte	MT	This was all ready tried and the data shows it was a waist of sportsman dollars . I say No to this .
Kaine Zetterberg	Valier	MT	Release the pheasants, bird numbers are down across Central MT and need a boost.
Pat Howe	East Helena	MT	This is a bad idea. Your premise from the start is inaccurate, as you state "not do the release and forego the associated opportunity to hunt" is an all or nothing simple view. As someone who has mentored several youth hunters on the special youth hunting days I speak with real world experience. There are also facts that pheasant stocking does not increase the population long term. There are numerous studies on that, just google it. The state should not get involved in the game farm business. Game farms do serve a purpose for put and take hunting, it is a private enterprise and should be stay that way. As for the youth they miss the birds my dog points. These are young slow flying birds over solid points! Shotgun shooting is far different than looking through a scope. It takes practice just like accurately hitting a golf ball does. They do not practice enough before taking the field. Their parents more often than not send them to the youth hunt with a gun that is too large for them to shoot quickly enough or with accuracy. I want young hunters to take up the sport. I have given my phone number to every youth hunters parent I have ever taken afield with the offer to take them again for another try. I know many others mentors have done the same. Not one has ever taken up the offer. Some things in life take effort and should be earned to be appreciated. If you can't take the time to practice shooting you will never have time for a bird dog. To spend the money on raising and stocking birds instead of habitat actually will prevent them from becoming bird hunters. Because they will soon be adults and many adults are dropping out of the sport for lack of game to go after because habitat is lacking. I think you would be further ahead using the money to support youth shooting at gun clubs and securing land for dog training. When you can shoot clays well or have a bird dog you will want to take it to the next level and go upland hunting! You should also open the dove season in Montana sooner if at all possible with the migratory bird regulations. Dove hunting is fun and you shoot a bunch! It is a missed opportunity for great fun for parents and youth hunters to be in the field together.
Kyle Reedy	Great Falls	MT	I don't believe this is sustainable and is a waste of budget. Pen raised birds don't last very long in the wild. How about improving habitat and the wild populations will expend on their own.
Earl Lenci	Great Falls	MT	Pen raised pheasants do not know how to forage. Are not aware of dangers of skunks, coyotes and foxes. They don't live long in the wild. In my opinion it is a waste of money to release pen raised pheasants. I recommend the money be reallocated to enhance wildlife habitat.
Michael Schaub	Bozeman	MT	Pheasants need habitat not numbers. Pen raised birds do not survive the wild and it would be a waste of money. No to this.
Diann Baier	Kalispell	MT	I am in favor of any pheasant releases to increase pheasant hunting opportunities
Paul Martin	Kalispell	MT	I am in favor of Pheasant releases.
Paul Henze	Deer Lodge	MT	Why purchase pheasants as the prison is going to get \$1 million dollars to raise them?

Russell Country Sportsmen's Assn	Great Falls	MT	Russell Country Sportsmen's Assn stands Firmly against this folly. Montana Sportsmen quit the practice of releasing pheasants [upland birds] decades ago because it does nothing to enhance the upland bird hunting experience in Montana. The Montana private game farms which offer pheasant hunting release the birds which are to be harvested on the day of the hunt and do not expect any survivors to live beyond 3 days. These facts and the science to back it up have not changed. Raising & releasing pheasants is a WASTE of sportsmen's dollars. These dollars are better spent on upland bird habitat improvement. The almost non-existent survival rate of pen raised upland birds is the reason that Pheasants Forever has partnered with BLM to jointly pay for the cost of a BLM employee who is 100% dedicated to improving upland bird Habitat on BLM land. Montana would do well to follow suit with DNRC lands. Pheasants Forever does not spend any money on releasing pen raised upland birds. Pheasants Forever are the experts in upland birds and all of their efforts go into habitat development. Russell Country Sportsmen's Assn stands firmly against using Sportsmen's dollars to release pen raised upland birds aka Pheasants. If Montana wants to use General Fund dollars for this folly so mode it be, BUT not Sportsmen's dollars.
Jacob Ahmann	Bozeman	MT	I would encourage that the money put towards future releases instead be directed to providing shelter belts, cover and forage for existing wild birds. Montana FWP has led by example in this realm before with out native trout versus hatchery trout, and our rivers are world class fisheries because of this shift. I think partnerships with local ranchers and improving our public lands in small ways will pay larger dividends for future generations than releasing any number of pheasants, many of which will succumb to predation and weather long before having time to make a meaningful impact for future years.
RYAN M CALLAGHAN	Bozeman	MT	Please do not spend the limited and valuable time and resources of MTFWP on a put and take pheasant program on state lands. I would whole heartedly support funding for improved habitat and access. The adage of give a man a fish v teach a man to fish is something our Governor should understand. Let's invest in sustainable habitat that can grow pheasants in the spring and summer, and over winter adult birds in the cold months. Additionally pen raised released birds on private lands only help wild populations in the fact that the pen raised birds are the ones that get shot, they do not survive and breed with wild birds. Reimbursing landowners for releasing their own birds is absurd, please do not spend sportsmens dollars on something so unsportsmenlike. Thank you.
Patrick Colbert	Missoula	MT	Initially I am unopposed to releasing pen raised animals. However, I fear this a way for private landowners to utilize public funds for their own gain. This is only to benefit outfitters and landowners not resident hunters.
Steve Jones	Billings	MT	Please stop this program. It is a waste of money. The only things benefiting are pheasants farms and coyotes. Put the money into improving habitat.
Andrew Lam	Helena	MT	The funds should be spent on habitat that will benefit wildlife long-term. Pen-raised pheasants provide a very short-term benefit and zero long-term benefit. This is a waste of money and resources. It will create crowds at the release sites, possibly raising the chance of wildfire as people will park in flammable tall grass. The released birds will be detrimental to wild bird populations. Releasing pen-raised pheasants is a bad, bad, bad idea.
Jim Muscat	Bozeman	MT	Please Please keep this program a priority and expand it. Recreation opportunity's are becoming more and more scarce with the advent of the influx of out of stators. The fall bird hunting is one of the few opportunity's to enjoy some peace and quiet.
Laurien Riehl	Missoula	MT	Pheasant releases will be Great but we also need a shorter season on the Flathead indian reservation on pheasant and make more safe zones for pheasants. We purchased a ton of land for hunting but we need to make some of that land safe zones and food plots.
Dale George	Great Falls	MT	I am not in favor of releasing More pen raised birds. There must be better ways to spend my money

Donna Hansen	Helena, Montana	MT	<p>Thank you for the opportunity to comment on Pheasant Releases. I believe that a plan to raise and plant pheasant appears short-sighted. The state tried that program years ago at Warm Springs and abandoned the plan. First, you can plan on half the peasannts being female and un-huntable. Likely fox bait and not expected to reach breeding age. It is shown that stocked birds are not meant to last long since they are not familiar with the release area and easily picked off. Second, it has been suggested that the birds will be released on public and private land possibly a week before the kids hunt. Pheasant hunting is a difficult sport and rarely sees a sizeable harvest from the kids hunt and fewer kids are interested in the sport. I feel the money can be better spent on habitat to preserve and grow our wild population. Also, releases are planned for WMA's and private land. The public has little to no access to the private land and in the past that access has been very limited and in many areas it is leased up. We certainly would not plant on private land leased to out of state groups. I am a pheasant hunter and see our access opportunities fading as well as habitat to support pheasants. Thank you!</p>
TANA KRADOLFER	Belgrade	MT	<p>I am a member of the Upland Gamebird Habitat Enhancement Council. Due to a declining interest from land owners the council has recently taken action to change the requirement for an annual expenditure on bird releases. After much discussion the council decided to keep pheasant releases on the table for the future but to make necessary changes so that funding could be put in to bird habitat instead. So suddenly this proposal to release pheasants seems out of step with the work of the council and the historical data regarding the desire of landowners to seek out, purchase and release pheasants. I support pheasant releases for youth and seniors especially on public land. But I have concerns about where and when to release birds in order to get the desired result of hunter recruitment. Each region will have it's own set of challenges for finding suitable parcels with access and habitat. I eagerly await more information on potential release locations. I would suggest a possible working relationship with UGBEP if suitable habitat is lacking for public land releases. Since I represent region 3 on the council I will tell you that suitable public habitat in region 3 for bird releases is pretty much limited to Canyon Ferry which already gets tons of hunting pressure. Perhaps some long over due efforts for habitat improvements on places like Fairweather should be considered as an essential part of any bird release program. Lastly, since I am a breeder and trainer of bird dogs I can tell you that the state of Montana doesn't have enough NPIP certified bird producers and obtaining pen raised birds for bird dog training and bird dog competitive events can be a challenge. Gamebirds are often obtained in neighboring state. Would there be a possibility of making pen raised game birds available to purchase by dog clubs, dog trainers, pheasant clubs and preserves? I support your effort to address hunter recruitment and retention. Let's put our heads together and come up with the right time and place to get it done. Respectfully submitted, Tana Kradolfer True Grit Brits Kennel Belgrade, MT</p>
Duane Ziegler	Miles City	MT	<p>I support expansion of pheasant releases. In particular, the release of adult hens in the spring have documented success. Thank you.</p>
Duane Ziegler	Miles City	MT	
Jeff Sturm	Helena	MT	<p>I have been pheasant hunting in Montana for over 40 years. Montana is a great place to bird hunt. Montana is a place where wild pheasants prosper given the right habitat conditions. When birds numbers are down a quick fix is to stock pen raised birds. This is a short sighted approach. In Montana we should be investing in our future by investing in habitat improvement efforts and not foolishly spending money on pen raised birds. I've taken many kids hunting and the biggest problem for kids is not seeing birds but hitting them and having the physical stamina to hunt pheasants. It's tough for kids to pheasant hunt. Lets build a vision of long term hunting opportunities not shooting pen raised birds. The money that is being proposed to raise and release pheasants can be better spent.</p>
Jessica Hill	Livingston	MT	<p>I oppose releasing nonnative pheasants</p>
Brian McCarty	Harrison	MT	<p>while i enjoy pheasant hunting i believe there are better ways to spend money than on pheasant releases. from what i've read in the past any pheasant released and not harvested by hunters has around a 10% chance of making it to the next season. just doesn't seem like one of the best ways to invest money in my opinion.</p>

David Yerk	Choteau	MT	As an avid and dedicated lifelong pheasant hunter, I STRONGLY oppose wasting license dollars on proposed pheasant releases. It is a total and complete waste of money because it has been confirmed time and time again that these birds do not survive and provide a return. Thus, pursuing the stocking of pen reared birds will do nothing to improve pheasant abundance on private lands, nor increase hunter recruitment and retention. These license dollars should be invested in habitat projects, which provide a known return in improved bird numbers. Follow the known science and do not waste precious license dollars. And get a backbone and stand-up up to such bogus legislation in the future. This proposal is setting back pheasant management in MT about 80-90 years!
Bridgar Hill	Livingston	MT	I don't agree with pheasant releases
Doug Bonsell	Ekalaka	MT	There should be more emphasis and priority to land owners that have developed and maintained habit for birds and wildlife, for pheasant releases.
Keith Fisk	PIERRE	SD	I would encourage commissioners to reject this program. Released pheasants have extremely high mortality and funds could be better used on habitat enhancements.
Nelson Kenter	Missoula	MT	Please do not use phony hunting conditions to entice younger people to hunt. By releasing birds that are not wild you will be creating an unnatural experience. And using money that could be better used elsewhere.
Benjamin Montgomery	Polson	MT	I'm lukewarm on pheasant releases on a large-scale. Science bears that released pheasants do not survive long, most certainly not long enough to breed and raise broods successfully. The cost per bird is extremely high and one has to question whether those funds would be better-directed towards securing more block mgt lands for upland bird hunting and/or improving WMAs and other public lands. I strongly oppose pheasant releases on private lands unless those lands are fully open to hunting.
Charles R Noland	Worden	MT	To lessen avian predation on the released birds, consider releasing at dusk and as close to opening day of season as possible.
Jacob Hutchens	Kalispell	MT	I think this is an awesome program and I hope that it continues to be pushed through and that people with land will step up and help raise these birds. However the influx of out of state-rs moving to Montana and buying up land is going to affect this program, with less land to hunt, and the increase of value has already incentivized many farmers here and mass land owners to sell, limiting hunting grounds. Just this year 20% of the privately owned land in the flathead county was purchased by texans and shut down to the public, that was previously open for hunting and managed by FWP.
Robert Griffin	Roy	MT	Quit wasting money on pheasant releases. If you want to help the pheasant population, spend those funds on habitat enhancement. Teach the kids that pheasants need year-round cover and the importance of native woody cover that seems to be disappearing. MT FWP published books in the 1950's on pheasant research in the state showing the need for habitat, not stocking of pen raised birds to increase populations. Read your own publications. Stocking is misguided!
Michael Restivo	Geneva	IL	My two cents: don't release any birds. Take the money and invest in new habitat for people to enjoy for many generations.
Stanley towarnicki	Lolo	MT	Yes,do it
Robert wogton	Clancy	MT	It's a.wonderful program for kids! You should have a youth day, the day after the release and allow kids to come and participate w/o huge competition from adults! Kids get really fired up and love it! The exercise and existent makes it an experience they never forget! Thanks for your time! Rob Wigton
Wayne DeVore	Lewistown	MT	What I've seen over the years about the pheasant release program is positive. I know of a couple areas where released pheasants have stared new breeding populations.
John K Klatt	Luck	WI	Do these Pheasants survive beyond release season? What counties is this proposed for?
Kevin Burns	Kalispell	MT	I completely disagree with Pheasant releases. Can we PLEASE put that money towards habitat improvement for upland birds including pheasant! This is exactly what happened when our legislators try to manage wildlife . Leave that job to FWP please
patrick mccarthy	Winston	MT	100% in favor of this.

Robert J Kayser	Billings	MT	With the opportunity for the state of Montana to provide incredible habitat through investing in habitat improvement and restoration, I cannot in good conscience support a stocked pheasant release program. Pen-raised pheasants lack the ability to survive on the landscape that wild-born birds have, and the vast majority wind up being food for predators which they have never encountered in their life it is quite simply a waste of wildlife dollars. The proposed funding for stocked pheasant hunting opportunities would be better spent improving habitat and access to wild bird populations, which would also improve access and opportunity for other game bird species. Additionally, with the main purpose of this program to be hunter recruitment through youth opportunity, the recruited youths will simply stop hunting once the opportunity has gone away. If wild bird populations were to be improved through habitat work, that would do far more for recruiting and retaining hunters than any stocking program could ever hope to achieve. In short, this seems like a handout to someone raising pheasants on a farm, without actually making a meaningful impact on hunter recruitment and retention, and is therefore a waste of our limited wildlife funding.
Tim Weiss	Bozeman	MT	1991 Montana State University Graduate, B.S. Fish & Wildlife Mgmt. 2019 MFWP retiree, 1988-2109 region 3 Fisheries and Wildlife Technician. Montana pheasant hunter since 1985. Known for years (by anyone with any basic knowledge of wildlife management) to be a waste of time, money, and effort - raised pheasant releases are not in the interest of Montana's wildlife management efforts. This is a purely non scientific and bad faith solution to a non existent problem. Any MFWP personnel who choose to not speak out in opposition to this hair brained idea is at best an ignorant sort, not suited for the profession, or a quiet partner complicit in the undoing of the legacy left by those who competently led the way on the path "Back from the Brink". Do not send Montana back to the brink. I never thought that I would use the phrase, "Habitat not Hatcheries" concerning the management of Montana's upland game bird resource. This state is an embarassment to itself..... I completely object to this "program".
Todd	Wise River	MT	
Jim Crichton	Helena	MT	I want to see releases of any game animal where the habitat offers a good chance of keeping a self sustaining population. Otherwise, no.
David	Helena	MT	Releasing pheasants is just feeding coyotes and is a monumental waste of \$1 million per year that could be used to improve habitat and provide long-term gains in wild pheasants.
Fred Jakubowski	Townsend	MT	Strongly oppose put and take pheasant releases. This goes against all FWP HAS stood for. This is a huge waste of money. Put the money towards habitat or other native game birds. We don't need to give prisoners a job raising birds and millions of dollars. To release pheasants on WMA's that already have birds and are already over run buy not only pheasant hunters but waterfowl hunters, deer hunters, moose hunters and general recreationists, is a terrible idea for so many reasons. And to say it is to recruit youth hunters is again ridicules'. It will bring more hunters no doubt, but they won't be the youth! FWP needs to recruit adult hunters that will in turn expose the youth. Dumping a bunch of dumb birds out to die is not teaching the youth anything other than what not to do from a wildlife agency.
john	Richmond	MI	I think it is a Waste of money and time.
Francis Reishus	Helena	MT	Please release the pheasants.
Kristopher George	Great Falls	MT	I do not support. Money should be spent on habitat and access for native game birds over glorified coyote bait.
Richard Athman	Hamilton	MT	I encourage FWP to adopt the pheasant program. A resident for 33 years and a active bird hunter. There always has been a shortage of pheasants to peruse. I wanted to raise pheasants back in '93. I was told by your wildlife biologist that he would not allow it. Now finally the department is taking a more progressive approach to increase hunting opportunities in our state for young hunters and now older hunters, like myself, who's has been waiting a long time for these programs t be fulfilled. Thank You

Phil Matteson	Cascade	MT	I support the pheasant release program and would encourage FWP to utilize Freezeout WMA as a release sight. The sight contains food, cover and is accessible to youth from the Great Falls and surrounding area. I also would encourage FWP to consider releasing the birds (or some of the birds) in August when grasshoppers are plentiful. I have been a dog handler on private preserves that have done such releases, as well as the traditional release immediately before hunting season. The difference is dramatic in my opinion. Birds released during summer when feed is plentiful, transition to becoming semi wild and foraging by hunting season. Birds released late fall are generally doomed to die rather quickly whether harvested by hunters or lost through lack of forage ability.
Rod McAllister	Livingston	MT	I think it's awesome
Dave Sturm	Clancy	MT	Waste of money. Use that million dollars to purchase land and access to land for the PUBLIC. We need more access to public land.
Robert McDaniel	Marion	OH	I have been coming to Montana for 15 years to hunt WILD birds!!! I am totally against the pheasant release program for many reasons!!! I can hunt released birds at home!!! I understand this mostly helps outfitters, which I am against. I and all my acquaintances self guide!!! TOO MANY OTHER REASONS AGAINST IT TO WRITE DOWN HERE!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!
Heather	Great Falls	MT	As a hunter I think just as much money needs to be spent on habitat improvement for pheasants before releasing them. Without habitat for them to live/thrive this is just a waste of money. I do not think FWP should be operating a game farm where animals are just bought and shot, FWP is supposed to manage wildlife and ethical hunting. If you build up good habitat and maybe reduce pheasant hunting limits there will be a reason to plant farm raised pheasants.
Thomas Ward	Missoula	MT	I personally don't want to see Montana Pheasant hunting become a put-and-take affair. However, I see a need to have higher quality hunting for youth engagement so I do support this plan. With one concern: I do not want to see hen pheasants harvested even if we have this plan in place and are releasing hens. My take on it is this: The more hens that make it through winter, the better chance we have higher natural recruitment the following spring. Ultimately pheasants should be able to take care of themselves or there is something else wrong.
Lynn Glock	Red Lodge	MT	I was always under the impression that pen raised birds do nothing to enhance the wild population. Hunting in SD on pen raised birds I see why. They are not the most intelligent or wily. Is it worth the money or the money better spent on habitat?
John Steab	East Helena	MT	Great idea if done properly. Too many properties over harvest. Habitat and predator management is also key.
Guy L Schoenborn	Columbus	MT	I don't agree that the state should raise and release pheasants. The money can be used much better in other ways.
BRIAN HOILAND	Billings Mt	MT	I have children and grand children in Washington State and they enjoy the opportunity with Pheasant Releases there. It works well there and could here also. There is a fee for the release season in Washington.
Hunter Stier	Belgrade	MT	I oppose the purchase and release of farm raised pheasants. As an avid upland bird hunter I would like to see these dollars invested in more long term goals such as habitat improvement projects and conservation easements. These types of projects will have lasting effects for pheasants, other wildlife, and future generations of hunters. In contrast, releasing pen raised birds is known to be a very ephemeral benefit. Thank you for the opportunity to comment, Hunter Stier
William Anderson	Butte	MT	Pheasant releases are a great tool to increase pheasant populations. However releasing roosters has no long term impact on populations. For maximum population impacts, leading to greater hunter recruitment, and long term tourism dollar growth, hen pheasant must be released. Populations are sustainable anywhere there is sufficient habitat in most of the state, including the west, southwest, and northwest areas of the state. Release of hens on private land can be highly desirable.
Jonathan King	Clancy	MT	I opposed spending FWP resources and put and take Pheasant operations. We should be investing money in habitat that supports game. This kind of thing may make sense in a state without abundant wildlife, but it doesn't make sense for Montana.

Dr. Jeff Bartos	Helena	MT	I oppose the farming and release of pheasants as it is less cost effective than protecting habitat for natural and wild reproduction of pheasants. I urge the Fish and Wildlife Commission to use the funds to pursue the proven and cost-effective methods of habitat protection instead of farming. Farmed pheasants have a far lower survival and reproduction rate, and this planned release would effectively subsidize properties for poor habitat management rather than encouraging and funding good habitat management.
Richard Douglass	Butte, Montana	MT	Pheasant releases have been scientifically proven to be not effective. They just provide a short time shooting gallery. Please put and end to the nonsense.
Shannon Maness	Dillon	MT	I fully support the proposal to release pheasant on private and public lands. Especially on public ground where a pheasant population can be established. This will create a relatively cheap opportunity for people to get involved in hunting.

3. Montana Sportsmen Alliance appreciates the opportunity to provide public comment on the June 24, 2021 F&W Commission action proposing programmatic approval for the Department to move forward with pheasant stocking on state areas for the purpose of youth hunter recruitment. We strongly support youth recruitment efforts. Effective hunter recruitment, retention and re-activation (R3) are essential to the future of public hunting. However, we oppose the Department's recommendation to move forward with an undefined programmatic approach that currently lacks public input and transparency in decision-making.

Considerable work has been done at the national, regional and state level in identifying barriers to participation in hunting, how those barriers might be reduced, and what metrics can be used to gauge success in those efforts. Based on license sales information analyzed through 2015 by the Department, the participation and retention rate of youth hunters in the 12-17 year old age group is relatively high compared to other age groups. If this is the target group, how will success be measured and what level of expenditure is appropriate?

We highly value our Wildlife Management Areas. They represent great examples of habitat managed for the benefit of a wide range of wildlife and a diversity of recreational opportunities. In many cases, they are intensively used during the hunting season, especially on the general season openers for pheasant and waterfowl. WMAs currently accommodate specific youth hunting seasons. While there is potential to increase success for youth hunters in that window of opportunity, we ask how will that be done without creating more crowded, competitive and less safe hunting conditions for kids?

Any proposal to increase this level of use on WMAs needs to be considered carefully. Hunting wild birds on a well-managed landscape is considerably different than pursuing pen-reared birds on a shooting preserve. We do not want to see WMAs turned into de facto shooting preserves for the general public.

Finally, the Upland Game Bird Enhancement Program (UGBEP) has guidelines established by statute and administrative rule through significant public input that provide a framework for delivery of both habitat enhancement and pheasant stocking.

Current pheasant release criteria specify that birds must be at least 10 weeks of age at the time of release, must be released during the period of August 1 – September 15, and that no more than 40% of the birds can be roosters. Adopting a different set of release criteria under a programmatic approach with no public input violates the trust responsibilities of the Department, seeks to avoid the administrative rule process and certainly devalues stakeholder engagement. To what end?

Delivery of effective youth recruitment hunting strategies is in our collective best interest. Let's assure that it is also a collective effort.

Montana Sportsmen Alliance Leadership Group

Joe Perry – Conrad

John Borgreen – Great Falls

Don Thomas – Lewistown

Doug Krings – Lewistown

Steve Schindler – Glasgow

Dale Tribby – Miles City

JW Westman – Park City

Jeff Herbert – Helena

Ray Gross – Dillon

Robert Wood - Hamilton

Tim Thier – Eureka