



THE HUMANE SOCIETY OF THE UNITED STATES

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VIA U.S. MAIL AND EMAIL

Dear Commissioner Grannis:

On behalf of our more than 842,000 members and constituents who reside in the state of New York, thank you for the opportunity to comment on the Department of Environmental Conservation's (DEC) Draft Management Plan for Ring-Necked Pheasants in New York. The Humane Society of the United States (HSUS) opposes continuing put-and-take pheasant stocking programs. These farm-reared, stocked birds are a non-native species equipped with limited survival skills to evade shooters and environmental factors.

Instead of accepting the failure of forcing an exotic animal to naturalize in foreign habitat, the DEC hand-rears pheasants and then releases the animals for a mock hunt in which the birds are literally "sitting ducks" for the waiting shooters. The propagation process inherently produces tamer birds unable to behave like wild animals. Studies consistently show that if shooters do not kill the animals immediately, they succumb to harsh weather, get eaten by predators or starve. Acknowledging this, the DEC admits that this program is solely for recreation and is not intended to increase naturalized populations of pheasants. Consequently, to make sure shooters receive the full benefit of the exotic birds, the animals are stocked just prior to and throughout the hunting season, creating an unethical hunting situation where wildlife managers have been known to dodge hunters attempting to follow the stocking truck.

Pheasant stocking programs depart from traditional wildlife management that emphasizes developing habitat for animals. Even within a hunting management paradigm, pheasant stocking is an anomaly. The traditional hunting ethic of valuing wild animals by meeting them in their natural habitats and killing an animal through knowledge of that animal's behavior and place in the ecosystem, is neither taught nor honored by killing animals raised in incubators, boxes and pens, and artificially placed in front of shooters.

Pheasant Stocking Constituency

In past years, the DEC spent at least \$750,000 per year to disperse a total of 100,000 pheasants. No general taxpayer funds or funds purported for wildlife and habitat protection should go towards continuing this program that is so wholly unconnected with wildlife management and preservation.

Pheasant stocking only panders to a continually shrinking constituency. In New York, pheasant shooters only purchase a small game license, not an additional stamp or tag(s). Small game license revenue is a pool of funding that continues to diminish as the same exorbitant number of pheasants are released each year. Even an increase in the small game license fee does not guarantee steady increased revenue, as the more expensive license will deter some past hunters from purchasing another license. The U.S. Fish and Wildlife Service (USFWS) reported that in New York small game hunters declined by 36 percent from 1996 to 2006, decreasing from approximately 256,000 to 164,000 individuals. In 1996, small game hunters made up 42 percent of all hunters; in 2006, small game hunters made up only 29 percent of all hunters. This decline began several decades ago and no recruitment efforts, including those based on stocked pheasant specialty hunts, have significantly reversed or slowed this attrition.

When considering lost revenue if pheasant stocking were ended entirely, it can only be guessed how many small game hunters would just continue hunting other small game, thereby contributing the same amount of license sales, and how many would cease buying that license because they exclusively hunted pheasants. Even when considering these lost participants, the multiplier factor for pheasant hunters is small since hunting the stocked birds typically does not involve long-distance travel, purchasing expensive electronic equipment, guide services, or overnight stays.

Pheasant shooters also only purchase a small game hunting license, not a stamp or a tag as many other stocking states require. If stocking continues, as part of the pheasant managements plan's monitoring and evaluation, The HSUS asks that the Department closely monitor those small game hunters exclusively participating in stocked pheasant hunts, as well as those killing other small game species. This will presumably allow the department to better audit how many hunters this program sustains and/or recruits, as well as whether participants fund the program to the fullest extent.

Reevaluating the pheasant stocking program is a good opportunity to put hunter-derived revenue in perspective with other outdoor user groups. In contrast to New York's small game hunters, New York's wildlife watching user-group, or those that go into the state's backyards to participate in activities like bird watching and hiking, continues to grow, giving the state a potentially new population on which to rely for much needed natural resources funding. The American Canoe Association cites 63 member clubs in New York and the New York-New Jersey Trail Conference is composed of over 100 hiking clubs. According to the USFWS, wildlife watchers included more than 3.1 million individuals in 1996, and comparatively in 2006, more than 3.5 million individuals patronized New York's local businesses to take advantage of watching activities – enough people to fill Yankee Stadium 68 times over.

The HSUS supports the Department in focusing more of its priorities on developing these sustainable constituencies, rather than investing in vast programs to produce insignificant numbers of hunters who cannot replace person-for-person those individuals choosing not to participate in hunting, or even those leaving or aging out of hunting.

Cooperative Rearing Programs

The HSUS heartily supports the Department ending the Young Adult Pheasant Release Program, which included the release of up to 30,000 birds during the summer at seven to ten weeks of age. Several studies confirm that birds released weeks prior to hunting season do not even survive to the beginning of shooting season – most are dead within four weeks of release. In fact, the DEC conducted research as far back as the 1960s that stated soft and summer release programs are unsuccessful for placing pheasants in the landscape to survive for hunting season in the fall, yet this program has continued since 1991. Prior to beginning the program, the DEC's own test releases revealed a 12.5 percent kill rate, not that different from the recent 10 percent rate resulting from a banded bird release study, and cited as a reason to now discontinue the program.

The DEC's website even provides the puzzling statement that the Young Adult Release Program provides hunters a "more traditional hunting experience using wilder birds." Reality is a different – and lesser – thing, as small game scientists agree that pheasants are unable to learn wild skills once released. Pen-reared birds cannot sustainably naturalize, or in some cases, even find food for themselves once released. The Young Adult Release Program is a complete abuse of these animals, as they are abandoned to predation or a prolonged death through exposure or starvation.

The HSUS also thanks the Department for its proposal to cease supplying 600 birds to field trials. Competitive trials subject the birds to continual harassment by dogs, and although the birds are not shot during the event, just like other released birds, they succumb to harsh weather conditions and predators.

For welfare concerns, The HSUS asks that the DEC end the Cooperative Day-Old Pheasant Chick Program. Among the limited states that stock pheasants, only one other state administers a similar chick program. The state would consider using big game hunting license sales to provide sportsmen's clubs with bear cubs erroneous; after all, hand-raised animals cannot survive in the wild. If clubs approached the state and asked that they assist it with reintroducing elk to huntable populations through raising and stocking fawns, the state would consider the notion comically absurd and immediately point to the possibility of ecological ruin through the spread of disease.

While raising pheasants perhaps might not have the same level of potential ecological consequences, The HSUS raises this point to discuss the complete oddity that the state regularly distributes live animals to private individuals for rearing and release onto public land. The state recommending cutting away parts of animals, placing plastic blinders through nose holes to deter common behaviors derived from overcrowding, is hardly within the purview of wildlife management.

Upon producing and hatching these chicks, the state is also responsible for their humane treatment throughout their lives. Participants in the day old chick program largely only follow guidelines rather than regulations for program compliance. After approving the applicant, the state does not inspect facilities to ensure that animals are treated humanely or environmental conditions will not lead to massive die offs. Prior to application approval, inspection is only at the discretion of the regional manager and not required. The state also has no formal reporting system for tracking chicks that survive propagation to release and where and when they are released on public land.

Many of the same concerns regarding early release associated with the Young Adult program are characteristic of this cooperative rearing program as well. Beyond eight weeks of age, release timing is only encouraged – creating the possibility for extreme release situations where birds become expensive to keep and are released too far in advance of hunting season and could starve or succumb to the elements; or released during hunting season a matter of minutes before waiting club members kill the birds.

Conclusion

Quite simply, hunting demands that animals be given a reasonable chance to escape, not released from the back of a truck at an announced date and time. Through pheasant stocking, the state either spends resources to give coyotes an expensive meal or encourages unethical hunting through releasing animals in front of the gun. Animals raised in a pen will never exhibit the same survival skills as naturalized or wild birds, and ending put-and-take pheasant programs is a humane choice to stop an unsustainable and wasteful program.

Sincerely,



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