

REPORT BY THE
AUDITOR GENERAL
OF CALIFORNIA

A REVIEW OF THE DEPARTMENT OF FISH AND GAME'S
PRIVATE LANDS WILDLIFE MANAGEMENT AREA PROGRAM

REPORT BY THE
OFFICE OF THE AUDITOR GENERAL

P-761

A REVIEW OF THE DEPARTMENT OF FISH AND GAME'S
PRIVATE LANDS WILDLIFE MANAGEMENT AREA PROGRAM

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P-761

Honorable Bruce Bronzan, Chairman
Members, Joint Legislative
Audit Committee
State Capitol, Room 448
Sacramento, California 95814

Dear Mr. Chairman and Members:

The Office of the Auditor General presents its report concerning the Department of Fish and Game's Private Lands Wildlife Management Area program. The report indicates a need for the Department of Fish and Game (department) to establish written criteria by which to determine the success of the Private Lands Wildlife Management (PLM) Area program.

In addition, as a matter of policy, the Legislature should be aware that while the PLM program has been authorized statewide since 1984, more than one-half of the department's 54 approved ranches are located within a 100-mile square area of northeastern California, primarily in rural Lassen, Modoc, and Shasta counties. However, neither state law nor the department's policies specifically address the proximity of the ranches to urban development, geographic diversity among areas of the State, or overall statewide goals of the PLM program.

Respectfully submitted,

A handwritten signature in cursive script that reads "Thomas W. Hayes".

THOMAS W. HAYES
Auditor General

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SUMMARY

RESULTS IN BRIEF

The Department of Fish and Game (department) administers the Private Lands Wildlife Management (PLM) Area program to encourage the conservation, propagation, and use of wildlife resources on private lands by offering incentives to private landholders who improve the habitat for wildlife on their land. During our review of the PLM program, we noted the following conditions:

- Although the PLM program is currently conserving approximately 694,000 acres of wildlife habitat, no guarantee exists that this habitat will be protected in the future because landholders may voluntarily withdraw from the program at any time;
- The department did not always document its visits to PLMs to determine whether the landholders had accomplished their planned improvements to wildlife habitat. However, when we visited ten PLMs, we observed that the landholders had generally made the planned improvements. Six of the ten PLMs are ones for which the department did not have documentation;
- Using the criteria of number of deer and deer herd composition to measure whether the program results in the propagation of deer is difficult because the size of the PLM is small in relation to the entire area occupied by the deer herd. In addition, other factors such as weather, predators, and illegal hunting affect the number of deer and the deer herd composition;
- The department charged fees that did not cover the cost of administering the PLM program; and
- Some inconsistencies exist in the regulations governing the PLM program.

BACKGROUND

The Fish and Game Commission (commission) and the department are responsible for protecting and conserving fish and wildlife resources in the State. The commission has general regulatory powers that include the authority to establish the time and length of hunting seasons, the quota of animals that can be taken each year, and the methods of hunting the animals. The department is responsible for administering and monitoring the PLM program. In October 1987, the program consisted of 54 PLMs encompassing approximately 694,000 acres.

PRINCIPAL FINDINGS

Some of the Department's Criteria for Measuring the Effectiveness of the PLM Program Are Limited

Although the department does not have written criteria for measuring whether the objectives of the PLM program have been met, department officials have stated that the department does use certain criteria to measure the program's effectiveness. However, some of these criteria are limited. For example, as one of its criteria to measure conservation, the department determines whether the program preserves wildlife habitat. Although the program is currently conserving approximately 694,000 acres of wildlife habitat, no guarantee exists that this habitat will be protected in the future because landholders may voluntarily withdraw from the program at any time. In fact, since 1985, four landholders have voluntarily withdrawn from the program.

As another criterion to measure effectiveness, the department reviews habitat improvements made on the PLMs. While this criterion is useful, the department did not always document its visits to PLMs to determine whether the landholders in the program had accomplished their planned improvements. Consequently, we

cannot be certain that all improvements that landholders in the program reported from fiscal year 1984-85 through fiscal year 1986-87 were actually accomplished. However, when we visited ten PLMs, we observed that the landholders had generally made the planned improvements. Six of the ten PLMs are ones for which the department did not have documentation.

Also, the department looks at number of deer and deer herd composition to determine whether the program encourages the propagation of wildlife on private lands. (Herd composition means the ratio of bucks to does and the ratio of fawns to does.) Using these criteria, it is difficult to measure whether the program results in the propagation of deer, which are the wildlife that we focused on, because the size of the PLM is small in relation to the entire area occupied by the deer herd. In addition, other factors such as weather, predators, and illegal hunting affect the number of deer and the deer herd composition.

The Department Charged Fees That
Did Not Cover the Cost of
Administering the PLM Program

The California Fish and Game Code requires that fees for PLM licenses and hunting tags and seals meet the costs incurred by the department in administering the PLM program.¹ Since the inception of the program in 1984, these fees have not covered the costs of administering the program. Consequently, the PLM account had a deficit of approximately \$34,000 at the end of fiscal year 1986-87. In addition, the department did not charge all the personnel costs that it incurred in administering the program to the PLM account. If the department had charged all personnel costs incurred to the

¹The department issues tags to hunters to hunt game, including deer, and it issues hunting seals for hunting some upland game, including quail.

PLM account, we estimate that the deficit would have been at least \$76,000, using the costs originally estimated by the department.

Inconsistencies in the Regulations
Governing the Private Lands Wildlife
Management Area Program

Some inconsistencies exist in the regulations governing the PLM program. For example, the California Code of Regulations requires the department to issue licenses to PLMs each fiscal year whereas the California Fish and Game Code requires the department to issue licenses that are valid for three calendar years. Furthermore, the California Code of Regulations requires that each PLM plan include an "estimate of affected wildlife"; however, it is not clear whether an "estimate of affected wildlife" refers to all wildlife on the PLM or only the wildlife that will be managed on the PLM. As a result of this ambiguity, some PLM plans contain a description of wildlife on the PLM in addition to the species to be managed while other plans only address the species to be managed. Finally, to some members of the public, sections within the California Code of Regulations appear ambiguous regarding the collection of fees for hunting tags and seals.

RECOMMENDATIONS

To improve its measurement of the effectiveness of the Private Lands Wildlife Management Area program, the Department of Fish and Game should take the following actions:

- Develop written criteria by which to determine the success of the program; and
- Document its visits to PLMs and indicate whether each planned improvement has been accomplished.

In addition, to ensure that the program pays for itself, the department needs to reassess its fee structure for PLM licenses and hunting tags and seals for the PLM program.

Also, the department should charge all personnel costs that it incurs in administering the program to the PLM account.

Finally, to clarify the regulations governing the PLM program, the department should make recommendations to the commission for resolving the inconsistencies and ambiguities in the California Code of Regulations.

AGENCY COMMENTS

The Department of Fish and Game concurs with our findings and will implement our recommendations.

INTRODUCTION

The Fish and Game Commission (commission) and the Department of Fish and Game (department) are responsible for protecting and conserving fish and wildlife resources in the State. The commission has general regulatory powers that include the authority to establish the time and length of hunting seasons, the quota of game animals that can be taken each year, and the methods of hunting game animals.² The commission also has the authority to adopt regulations for implementing the Private Lands Wildlife Management (PLM) Area program. The department is responsible for administering the PLM program.

In 1980, the Legislature approved a three-year pilot program to test the feasibility of providing incentives to landholders to protect and improve wildlife habitat on their property. The pilot program involved five ranches, ranging from 6,500 to 270,000 acres, in five counties. These ranches were licensed as wildlife management areas. Based on the favorable results of this pilot program, the Governor and the Legislature authorized the commission, beginning on January 1, 1984, to permit the department to issue licenses for wildlife management areas on private lands. The commission adopted a policy for the department to follow in issuing these licenses.

²The California Fish and Game Code defines to "take" as to hunt, capture, or kill, or to attempt to hunt, capture, or kill animals.

Title 14 of the California Code of Regulations, Section 601, describes the PLM program. The purpose of this program is to encourage the conservation, propagation, and use of wildlife resources on private lands by offering incentives to private landholders who protect and improve the habitat for wildlife on their land. Habitat improvements include reducing the number of cattle grazing on the habitat, selective burning to rejuvenate the habitat, planting and seeding, and improving water sources. The incentives to landholders include the authorization of a certain number of tags and seals allowing the hunting of certain species of animals on the landholders' properties.³ According to commission regulations, the department charges landholders specified fees for these hunting tags and seals. In turn, the landholders can issue these hunting tags and seals to individuals interested in hunting on the landholders' properties.

Another incentive to landholders is the commission's authorization of extended hunting seasons. Under the PLM program, the commission can authorize a hunting season on a PLM that extends beyond the general hunting season for that zone. (For deer hunting, the commission has divided the State into zones to control the number of hunters allowed in specific areas of the State and the number of tags that can be issued in each area.) In March 1986, the commission

³The department issues tags to hunters to hunt game, including deer, and it issues hunting seals for hunting some upland game, including quail.

adopted a policy for ensuring that when extended season hunts are approved on PLMs, comparable hunting opportunities exist for the general public in the same or adjacent hunting zones unless the department determines that such special hunts in the same or adjacent zones are not biologically or statutorily feasible. When the department determines whether a special hunt is biologically feasible, it considers factors such as the condition of the wildlife. In the case of deer, for example, the department considers factors such as the number of deer and the deer habitat.

The department is required to report annually to the Legislature on the status of the program. The report has to include a listing of landholders participating in the program, wildlife management activities (which include habitat improvements), the wildlife species managed, and data on the animals killed under this program. As of October 1987, the program consisted of 54 PLMs. The department's records indicate that these 54 PLMs consist of a total of approximately 694,000 acres. Appendix A shows the location of these PLMs.

Process for Licensing a Private Lands Wildlife Management Area

To operate a wildlife management area on private land, a landholder must submit a complete application form to the appropriate regional office of the department. As part of the application, the applicant must include a nonrefundable license fee of \$400 and a

wildlife management plan. This plan must contain specific information regarding the proposed wildlife management area, including the following items: a legal description of the land; an estimate of the number and type of affected wildlife, including an estimate of animal population density; a description of the habitat, including a description of range condition; a detailed description of the proposed improvements that are intended to achieve the plan objectives; and the relevant county's land-use designation for the area. After the regional office has reviewed the application for content and completeness, it forwards the application to the department for its review. The department can then recommend the application for approval to the commission. When the department does not recommend approval, the applicant may appeal that decision to the commission.

Upon approval of the wildlife management plan by the commission, the department issues a license for operating a PLM in accordance with the regulations of the commission and the terms and conditions of the license. The licenses issued for PLMs are revocable and nontransferable. Each license is valid from July 1 through June 30 and subject to annual review and renewal by the commission. The application fee covers a three-year license period.

The annual review process begins after the department has received the annual renewal application and the hunting tag fees for the previous year. The department then reviews each renewal application to determine whether the licensee has fulfilled his or her

obligations as outlined in the objectives of the PLM plan. This mandatory annual renewal process includes a field inspection by a department representative to verify that the licensee has accomplished the habitat protection and enhancement work outlined in the PLM plan. The department then makes a recommendation to the commission to either approve or reject the application. The commission schedules both new applications and annual renewal applications as agenda items for public hearings.

The California Fish and Game Code requires that the program's fees for PLM licenses and hunting tags and seals are established at a level that allows the department to recover the costs that the department incurs in administering the program.

SCOPE AND METHODOLOGY

The purpose of this audit was to determine whether the PLM program is effective in encouraging the conservation, propagation, and use of wildlife resources on private lands. To determine the effectiveness of the PLM program, we reviewed applicable state laws and regulations and commission and department policies. We also identified the total acreage in the program and the specific improvements made to benefit wildlife. For this purpose, we reviewed the files of all 54 PLMs that were in the program as of October 1987.

Further, because the department did not have written criteria to measure the effectiveness of the program, we interviewed the director of the department who told us how the department measures the program's effectiveness. For a judgemental sample of 25 of the State's 54 PLMs, we determined whether the objectives for habitat improvements in PLM plans were fulfilled. We also visited 10 PLMs to observe whether the landholders had accomplished planned improvements. Furthermore, we analyzed trends in population and composition of deer herds on the 23 PLMs that involved the management of deer and compared this information to the State's objectives for these deer herds. (Herd composition means the ratio of bucks to does and the ratio of fawns to does.) We also identified other factors that could affect deer populations by reviewing the State's deer herd management plans and interviewing biologists from the department.

Also, to determine whether the costs of administering the PLM program were covered by the fees charged to landholders in the program for PLM licenses and hunting tags and seals, we reviewed the revenues and expenditures of this program.

In addition, we were requested to determine the impact of the commission's authorized extended hunting seasons on wildlife. For this review, we focused on the impact on deer in particular. However, because we lack the expertise necessary to determine this impact, we gathered information only on the percentage of deer that were killed in the extended hunting season and the breeding season. For this purpose,

we reviewed all the available tags for deer killed in 1986 for the PLMs in our sample. Of the 25 PLMs, 2 did not involve the management of deer, 5 were not licensed in 1986, and for one PLM, the tags were not available for review. (Appendix B presents information on the percentage of deer killed in the extended hunting season and in the breeding season on PLMs.)

We were also asked to determine whether illegal hunting occurred on wildlife refuges that were associated with the PLM program. To determine this, we identified the PLMs located in or near wildlife refuges. We interviewed department personnel and reviewed citation records from 1984 through 1987 for evidence of illegal activities on these refuges. Further, we reviewed the department's records for its CalTIP hotline. The CalTIP hotline is used for reporting suspected violations and complaints concerning fish and wildlife. (Appendix C presents information regarding illegal hunting on wildlife refuges that were associated with the PLM program.)

In addition, we were asked to assess the technical quality of the PLM plans. We did not attempt to assess the technical quality of the PLM plans because of the expertise required for such a review. We limited our review of the plans to a determination of whether they complied with state laws and regulations and commission policy.

Finally, we were asked to determine the costs that PLMs incur in accomplishing their objectives. However, first, we do not have access to private financial records. Second, the law establishing the PLM program does not require that private financial records, other than accounts for hunting tags and seals, be available for the State's review. Third, even if we had access to the records, we would not be able to determine the expenses incurred by the PLM landholders in making improvements. For example, one landholder in our sample told us that he purchased a tractor to make improvements to the wildlife habitat on his ranch. In this situation, we could not determine if the equipment had also been used for making other improvements to the area unrelated to the program. Further, we identified the hunting fees charged by seven landholders. These seven landholders charged fees for hunting deer ranging from \$10 for a doe tag to \$2,900 for a buck tag, which includes costs for services such as guides, meals, and lodging. However, we were unable to determine the economic returns to these private landholders.

CHAPTER I

SOME OF THE DEPARTMENT OF FISH AND GAME'S CRITERIA FOR MEASURING THE EFFECTIVENESS OF THE PRIVATE LANDS WILDLIFE MANAGEMENT AREA PROGRAM ARE LIMITED

The legislative intent of the Private Lands Wildlife Management (PLM) Area program is to encourage the conservation, propagation, and use of the wildlife resources on private land. Although the Department of Fish and Game (department) does not have written criteria for measuring whether these objectives have been met, department officials have stated that the department does use certain criteria to measure the program's effectiveness. However, some of these criteria are limited. For example, as one of its criteria to measure conservation, the department determines whether the program preserves wildlife habitat. Although the program is currently conserving approximately 694,000 acres of wildlife habitat, no guarantee exists that this habitat will be protected in the future because landholders may voluntarily withdraw from the program at any time. In fact, since 1985, four landholders have voluntarily withdrawn from the program. As another criterion to measure effectiveness, the department reviews habitat improvements made on the PLMs. While this criterion is useful, the department did not always document its visits to PLMs to determine whether the landholders in the program had accomplished their planned improvements. Consequently, we cannot be certain that all improvements that landholders in the program reported from fiscal year 1984-85 through fiscal year 1986-87 were actually

accomplished. However, when we visited ten PLMs, we observed that the landholders had generally made the planned improvements. Six of the ten PLMs are ones for which the department did not have documentation. Also, the department looks at the number of deer and the deer herd composition to determine whether the program encourages the propagation of wildlife on private lands. (Herd composition means the ratio of bucks to does and the ratio of fawns to does.) Using these criteria, it is difficult to measure whether the program results in the propagation of deer, which are the wildlife that we focused on, because the size of the PLM is small in relation to the entire area occupied by the deer herd. In addition, other factors such as weather, predators, and illegal hunting affect the number of deer and the deer herd composition.

MEASURES OF THE EFFECTIVENESS OF THE PLM PROGRAM

With the intent of encouraging the conservation, propagation, and use of wildlife resources on private lands, the Legislature enacted Section 3400 of the California Fish and Game Code authorizing the Fish and Game Commission (commission) and the department to encourage the development of wildlife management programs on private lands. Although the department does not have written criteria for measuring the effectiveness of the PLM program, the director of the department stated that important measures of the effectiveness of the PLM program are the number of acres in the program and whether the wildlife habitat has been improved. Habitat improvements include selective burning to

rejuvenate the habitat, planting and seeding, and improving water sources. In measuring whether the program is fulfilling the first legislative intent of the program, that is, whether it is encouraging the conservation of wildlife on private land, we used two criteria: whether wildlife habitat has been preserved and whether habitat has been improved.

In reviewing whether the program is fulfilling the second legislative intent, that is, whether it is encouraging the propagation of wildlife on private land, we focused on deer in particular. To encourage the propagation of deer, the department has developed goals for the number of deer and the composition of specific deer herds in California.

The third intent of the PLM program is to encourage the public's use of wildlife resources on private lands. The assistant chief of the Wildlife Management Division stated that the department, through the PLM program, encourages the use of wildlife, including hunting, where such use is consistent with maintaining healthy wildlife populations. The number of hunting tags issued to PLMs is an indication of the use of wildlife for hunting.

CONSERVATION OF WILDLIFE ON PLMS

The department primarily measures the effectiveness of the program in encouraging the conservation of wildlife on private lands by whether wildlife habitat has been protected and preserved and by whether wildlife habitat has been improved.

Preservation of Wildlife Habitat

The department considers the program to be effective in preserving wildlife habitat. For example, of the 23 PLMs in our sample that involved the management of deer, 10 occupied land on the winter ranges of migratory deer herds. Of these 10 PLMs, 4 PLMs were classified by the department as critical winter habitat. In its recommendation to the commission that these lands be approved for the PLM program, the department classified the lands as providing the food, cover, and water essential to maintaining the deer herds on the winter ranges. For example, one of the 4 PLMs is located in Modoc County, and although it consists of only 640 acres, it is described by the department as one of the most critical deer areas in northern California. The department's file on this PLM indicates that over 1,000 deer have been counted on the PLM in mid-winter.

However, while these lands in the PLM program currently do preserve approximately 694,000 acres of wildlife habitat, no guarantee exists that the lands will be preserved in the future because the

landholders may withdraw from the program at any time, and the statutes do not contain penalties for withdrawal. For example, since 1985, four landholders have voluntarily withdrawn from the program because of reported financial problems, including the high cost of insuring hunters.

In addition, the department has categorized 7 other PLMs in our sample of 25 as ones that they could possibly lose in the future. For example, it has determined that a PLM in Modoc County is threatened with loss of habitat because of the possibility that the land may be subdivided in the future. The land may be subdivided because, according to department records, the landholder is under pressure to develop the land and to use it in ways that could greatly reduce its value to deer. The department also classified the 6 other PLMs as being threatened with loss of habitat because of the potential for land development in these areas. For example, one of the PLMs is in Nevada County and is adjacent to a community that the department estimates has a population of 2,000 to 3,000. At any time, the owner of the PLM could subdivide or sell his land to a developer interested in expanding this adjacent community. The other 5 PLMs are located in Lassen, Tehama, Tulare, Yuba, and Modoc counties. These 7 PLMs consist of a total of approximately 61,300 acres.

Habitat Improvement

The PLM landholders have made habitat improvements that include reducing the amount of cattle grazing on their lands, burning brush to rejuvenate habitat, and planting areas of brush, alfalfa, and other forage crops for wildlife. Table 1 shows the number of acres and some habitat improvements that the 35 PLMs in the program as of June 30, 1987, have reported to the department from fiscal year 1984-85 through fiscal year 1986-87. This table pertains to the current PLMs and does not include those PLMs that are no longer in the program.

TABLE 1

**NUMBER OF ACRES AND SOME HABITAT IMPROVEMENTS
ON PRIVATE LANDS WILDLIFE MANAGEMENT AREAS*
FISCAL YEAR 1984-85 THROUGH FISCAL YEAR 1986-87**

	<u>1984-85</u>	<u>1985-86</u>	<u>1986-87</u>
Number of PLMs	5	16	35
Acres in the program	299,400	438,435	581,360
Acres burned	2,400	2,630	4,860
Acres planted and seeded	1,422	1,363	2,311

* Some landholders in the PLM program reported habitat improvements in the above categories but did not identify the number of acres that they had improved. Since the landholders did not report the acreage, we could not report it either. In addition, the number of acres planted and seeded includes all acreage on which planting and seeding was attempted, not just the acreage where planting and seeding was successful. Finally, this table pertains to the current PLMs and does not include those PLMs that are no longer in the program.

Source: Files from the Department of Fish and Game that contain reports from landholders participating in the PLM program.

In addition to the improvements listed in Table 1, landholders also enhanced the water sources on their property. Of the 35 PLMs reporting improvements, 29 reported improvements that they had made to the water sources on their property through fiscal year 1986-87. Improvements to water sources include the development of springs and the construction of reservoirs.

However, while the criterion regarding habitat improvements is useful, the department is not documenting all of its on-site reviews to ensure that landholders are actually making these improvements. Title 14 of the California Code of Regulations, Section 601(b)(5), requires that the department determine whether the landholders in the PLM program have accomplished their planned habitat improvements. In addition, department policy requires a field inspection by a department representative to verify that the landholders have accomplished the habitat improvements and protection measures outlined in their PLM plans.

In our sample of 25 PLMs, 7 were not licensed before 1987; therefore, the 7 PLMs did not have to accomplish their planned improvements before their licenses were renewed in 1988. For the remaining 18 PLMs that were licensed before July 1987, the department was required to annually verify that applicable habitat improvements had been made. Regional wildlife management supervisors stated that all PLMs had been visited by regional staff to verify that improvements had been accomplished. However, for fiscal year 1986-87, files for 8

of the 18 PLMs did not contain documentation, such as field notes or written statements, to verify that the department's regional staff had observed the improvements. Without such documentation, we cannot be certain whether the department has fulfilled its obligations to monitor the program, and consequently, we cannot be sure that all improvements that landholders reported from fiscal year 1984-85 through fiscal year 1986-87 were actually accomplished.

To confirm that planned habitat improvements for fiscal year 1986-87 had been accomplished, we visited ten PLMs. Six of these PLMs were ones for which the department had failed to provide evidence of monitoring, but we observed that, for all ten PLMs, planned improvements had generally been made. We observed that 55 of the 78 improvements listed in the plans for the ten PLMs had been made and 7 improvements were not made. We could not verify the remaining 16 improvements during our visits. These unverified improvements included the reduction of cattle grazing during periods that we could not observe and other improvements on lands that were inaccessible because of adverse weather conditions.

One of the ten PLMs that we visited was located in Nevada County. For this PLM, the department did not maintain documentation that it had verified habitat improvements. The improvements proposed in the PLM's plan included burning and seeding 150 acres to rejuvenate the habitat, removing weaker trees and thinning brush on woodland areas, piling brush for quail cover, fencing ponds to control access by

livestock, improving the banks of the springs and ponds, and periodically moving cattle from field to field to maintain plant growth. In March 1988, we observed that these improvements had been accomplished except for the moving of cattle, which could not be verified at the time of our visit.

Another of the ten PLMs that we visited was located in Modoc County. For this PLM, the department had maintained documentation that it had verified habitat improvements. The improvements proposed in the PLM's plan included establishing a five-acre nonirrigated field of alfalfa, planting 75 bitterbrush seedlings and 25 juniper seedlings, deferring the grazing of cattle on 200 acres, establishing 25 willow clumps around existing reservoirs and wildlife reserves, and maintaining 30 acres of wetland as a wildlife reserve. We observed that all of these improvements had been accomplished; however, we could not determine the extent to which cattle grazing had been deferred.

PROPAGATION OF WILDLIFE ON PLMS

In reviewing whether the program encourages the propagation of wildlife on private lands, we focused on deer in particular. According to the assistant chief of the department's Wildlife Management Division, indicators for measuring how the program benefits deer include changes in the number of deer and changes in the deer herd buck-to-doe and fawn-to-doe ratios. The department has developed 79 management plans that deal with either a single deer herd or a group of

similar deer herds. The plans usually contain goals applicable to the size and composition of the deer herds. Table 2 presents an example of the department's propagation objectives for the Warner Mountains deer herd located in the eastern part of Modoc County.

TABLE 2
PROPAGATION OBJECTIVES FOR THE
WARNER MOUNTAINS DEER HERD

<u>Indicators</u>	<u>Recent Average</u>	<u>1993 Goal</u>
Herd size	8,000	12,000
Buck-to-doe ratio	15:100	15-20:100
Fawn-to-doe ratio	31:100	40-50:100

Source: A publication of the Department of Fish and Game entitled "Warner Mountains Deer Herd Management Plan Summary," prepared in 1985.

Of the 23 PLMs in our sample that involved the management of deer, 13 were either not in the program long enough to show population and composition trends or the files for the 13 PLMs did not contain enough information. The remaining 10 PLM files showed that, from 1986 through 1987, changes occurred in the buck-to-doe and fawn-to-doe ratios. These changes ranged from an increase of 56 percent to a decrease of 32 percent in buck-to-doe ratios and from an increase of 32 percent to a decrease of 55 percent for fawn-to-doe ratios. However, these trends cannot be used to measure the effectiveness of the PLM program. According to the assistant chief of the Wildlife

Management Division, the deer on a PLM represent only a small part of the deer herd that actually ranges over a much broader area than the PLM. Consequently, determining population and composition trends for those deer on the PLMs does not provide an accurate representation of the deer herd as a whole. Furthermore, other factors also affect the number of deer and the deer herd composition. These factors include weather, predators, and illegal kills.

THE USE OF WILDLIFE ON PLMS

According to Section 1801 of the California Fish and Game Code, the policy of the State is to maintain sufficient populations of wildlife and maintain diversified recreational uses of wildlife, including the sport of hunting. The assistant chief of the Wildlife Management Division stated that the department, through the PLM program, encourages the use of wildlife, including hunting, where such use is consistent with maintaining healthy wildlife populations.

The number of hunting tags issued to PLMs is an indication of the use of wildlife for hunting. To determine whether the PLM program sufficiently encourages the use of wildlife resources, we would need to compare the number of hunting tags issued in the PLM areas before the PLM program was implemented with the number issued for the PLMs after the program was implemented. However, we did not measure the use of the PLM program because of the lack of records to establish the number of animals taken before the PLM program was implemented. Nevertheless,

in Appendix D, we present specific information on the number of hunting tags issued on PLMs for various wildlife species for fiscal year 1985-86 through fiscal year 1987-88. Finally, in Appendix E, we present the number of deer hunting tags issued to PLMs compared with the number of deer hunting tags issued for the hunting zone in which the PLM is located for fiscal year 1986-87.

CONCLUSION

The legislative intent of the Private Lands Wildlife Management Area program is to encourage the conservation, propagation, and use of the wildlife resources on private lands. Although the Department of Fish and Game does not have written criteria for measuring whether these objectives have been met, department officials have stated that the department does use certain criteria to measure the program's effectiveness. However, some of these criteria are limited. For example, as one of its criteria to measure conservation, the department determines whether the program preserves wildlife habitat. Although the program is currently conserving wildlife habitat, no guarantee exists that this habitat will be protected in the future because the landholders may voluntarily withdraw from the program at any time. In fact, since 1985, four landholders have voluntarily withdrawn from the program. As another criterion to measure effectiveness, the department reviews habitat improvements

made on the PLMs. While this criterion is useful, the department did not always document its visits to PLMs to determine whether the landholders in the program had accomplished their planned improvements. Consequently, we cannot be certain that all improvements that landholders in the program reported from fiscal year 1984-85 through fiscal year 1986-87 were actually accomplished. However, when we visited ten PLMs, we observed that the landholders had generally made the planned improvements. Six of the ten PLMs are ones for which the department did not have documentation. Also, the department looks at the number of deer and the deer herd composition to determine whether the program encourages the propagation of wildlife on private lands. Using these criteria, it is difficult to measure whether the program results in the propagation of deer, which are the wildlife that we focused on, because the size of the PLM is small in relation to the entire area occupied by the deer herd. In addition, other factors such as weather, predators, and illegal hunting affect the number of deer and the deer herd composition.

RECOMMENDATIONS

To improve its measurement of the effectiveness of the Private Lands Wildlife Management Area program, the Department of Fish and Game should take the following actions:

- Develop written criteria by which to determine the success of the program; and
- Document its visits to PLMs and indicate whether each planned improvement has been accomplished.

CHAPTER II

THE DEPARTMENT OF FISH AND GAME CHARGED FEES THAT DID NOT COVER THE COST OF ADMINISTERING THE PRIVATE LANDS WILDLIFE MANAGEMENT AREA PROGRAM

The California Fish and Game Code requires that fees for licenses and hunting tags and seals meet the costs incurred by the Department of Fish and Game (department) in administering the Private Lands Wildlife Management (PLM) Area program.⁴ Since the inception of the program in 1984, these fees have not covered the costs of administering the program. Consequently, the PLM account had a deficit of approximately \$34,000 at the end of fiscal year 1986-87. In addition, the department did not charge all the personnel costs that it incurred in administering the program to the PLM account. If the department had charged all personnel costs incurred to the PLM account, we estimate that the deficit would have been at least \$76,000, using the costs originally estimated by the department.

Section 3402 of the California Fish and Game Code states that each license application should be accompanied by a nonrefundable fee in an amount established by the commission which, in conjunction with fees collected according to Section 3407 of the code, meet the department's costs in administering the program. Section 3407 states

⁴The department issues tags to hunters to hunt game, including deer, and it issues hunting seals for hunting some upland game including quail.

that fees for hunting tags and seals should be established by the commission in amounts which, in conjunction with fees collected according to Section 3402, are calculated to meet costs incurred by the department in administering the program.

The assistant chief of the department's Wildlife Management Division stated that the fees for PLM licenses and hunting tags and seals were established at a level that the department believed would have paid for the projected administrative costs of the program. He added that in an effort to ensure that revenues kept up with costs, the department recommended and the commission adopted fee increases that became effective April 1987. However, at the end of fiscal year 1986-87, the PLM account had a deficit of \$34,000. This deficit includes expenditures associated with two contracts totaling \$80,000.

According to the assistant chief of the Wildlife Management Division, the division did not include the expenditures associated with the contracts when it estimated costs for administering the program because the division considered these expenditures to be start-up costs that did not need to be reimbursed. The assistant chief also stated that, for the first three years of the program, the division had overestimated the level of participation in the program.

In addition, according to the chief of the department's Fiscal and Administrative Branch, the department's accounting office did not allocate to the PLM account all the personnel costs that the department incurred in administering the PLM program. For example, the appropriate portions of unit managers' and wildlife supervisors' salaries have not been charged to the account. Instead, some of these salaries were charged to Wildlife Management, which is one of the department's accounting codes. If the department had charged all the personnel costs that it incurred in administering the program to the PLM account, we estimate that the deficit would have been at least \$76,000, using the costs originally estimated by the department.

RECOMMENDATIONS

To ensure that the Private Lands Wildlife Management Area program pays for itself, the Department of Fish and Game should reassess its fee structure for PLM licenses and hunting tags and seals for the PLM program.

In addition, the department should charge all personnel costs that it incurs in administering the program to the PLM account.

CHAPTER III

INCONSISTENCIES IN THE REGULATIONS GOVERNING THE PRIVATE LANDS WILDLIFE MANAGEMENT AREA PROGRAM

Some inconsistencies exist in the regulations governing the Private Lands Wildlife Management (PLM) Area program. For example, the California Code of Regulations requires the Department of Fish and Game (department) to issue and renew licenses to PLMs each fiscal year whereas the California Fish and Game Code requires the department to issue licenses that are valid for three calendar years. Furthermore, the California Code of Regulations requires that each PLM plan include an "estimate of affected wildlife"; however, it is not clear whether an "estimate of affected wildlife" refers to all wildlife on the PLM or only the wildlife that will be managed on the PLM. As a result of this confusion, some PLM plans contain a description of wildlife on the PLM in addition to the species to be managed while other plans only address the species to be managed. Finally, to some members of the public, sections within the California Code of Regulations appear ambiguous regarding the collection of fees for hunting tags and seals.

In issuing licenses to PLMs, the department follows Section 601(b)(3) of the California Code of Regulations, which states that a PLM license should be issued and renewed each fiscal year. However, Section 3406(a) of the California Fish and Game Code states that licenses should be valid for three calendar years. The department's licenses for each fiscal year conform with the dates on individual hunting licenses.

Furthermore, Section 601(b)(1)(B) of the California Code of Regulations requires that each PLM plan include an "estimate of affected wildlife" on the PLM. The department staff reviewing PLM plans are inconsistent in their interpretation of what is meant by an "estimate of affected wildlife." For example, some PLM plans contain a description of wildlife on the PLM in addition to the species to be managed while other plans only address the species to be managed. In our sample of 25 PLMs, 8 plans addressed only the type of wildlife to be managed. The remaining 17 plans addressed both the species to be managed and other wildlife on the PLM.

Finally, Section 601(d)(2) of the California Code of Regulations states that licensees should pay for "all of the previous year's supply of tags and seals" before the licenses for the PLMs can be renewed. This subsection of the code appears ambiguous to some members of the public because it does not specify whether a licensee has to pay for only the hunting tags and seals that have been used (issued to the hunter) or for all hunting tags and seals issued to the PLM. Section 601(c)(3) of the same code states that the licensee should pay the department the fee for each hunting tag and seal issued to hunters. The department adheres to Section 601(c)(3) and collects fees only for the hunting tags and seals issued to hunters. Although we do not agree that these two subsections within the code are necessarily inconsistent, the department should clarify Section 601(d)(2) to remove the apparent ambiguity.

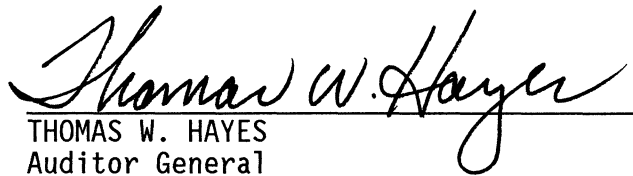
RECOMMENDATIONS

To clarify the regulations governing the Private Lands Wildlife Management Area program, the Department of Fish and Game should resolve the following:

- The inconsistency between the California Fish and Game Code and the California Code of Regulations regarding the licensing period for PLMs;
- The interpretation of Section 601(b)(1)(B) of the California Code of Regulations regarding what PLM plans describe as an "estimate of affected wildlife"; and
- The apparent ambiguity between Section 601(d)(2) and Section 601(c)(3) of the California Code of Regulations regarding the payment of hunting tags and seals issued to PLMs.

We conducted this review under the authority vested in the Auditor General by Section 10500 et seq. of the California Government Code and according to generally accepted governmental auditing standards. We limited our review to those areas specified in the audit scope section of this report.

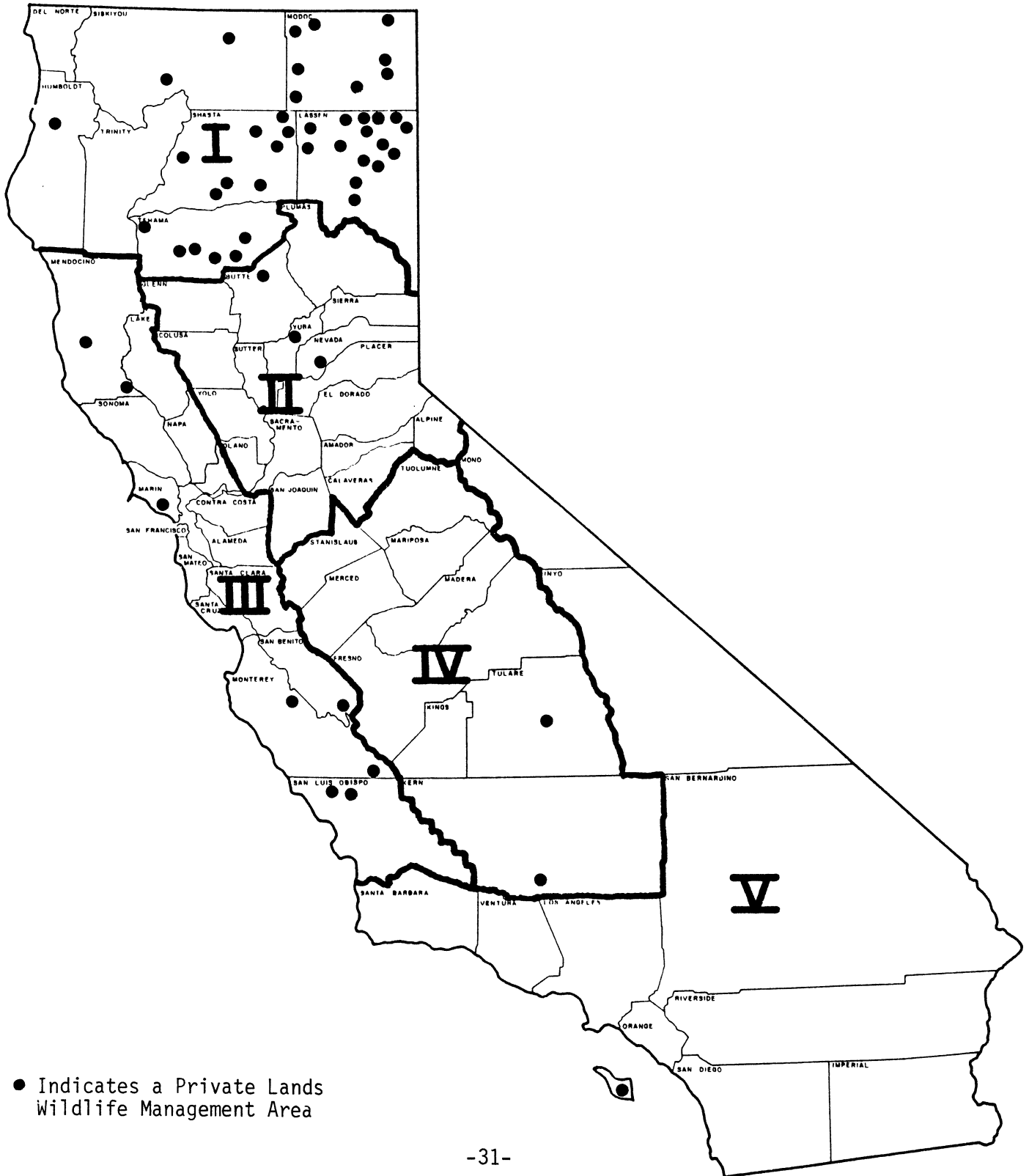
Respectfully submitted,


THOMAS W. HAYES
Auditor General

Date: May 2, 1988

Staff: Robert E. Christophel, Audit Manager
Murray Edwards
Sandhya Bhate
Keith W. Kuzmich

THE LOCATION OF 54 PRIVATE LANDS
WILDLIFE MANAGEMENT AREAS IN THE
DEPARTMENT OF FISH AND GAME'S FIVE REGIONS



APPENDIX B

PERCENTAGE OF DEER KILLED IN THE BREEDING SEASON AND IN THE EXTENDED SEASON ON PRIVATE LANDS WILDLIFE MANAGEMENT AREAS

We were requested to determine the impact of the extended hunting season on wildlife populations. For this review, we focused on the impact on deer in particular. However, because we lack the technical expertise to determine this impact, we present information only on the percentage of deer that were killed on our sample of PLMs in the breeding season and the extended hunting season.

The occurrence of the breeding season for deer herds varies according to the location of the herds. The breeding season is stated in the PLM renewal application summary. We defined the extended hunting season on a PLM as the period when hunting was authorized for the PLM but was not authorized for the overall hunting zone in which the PLM is located. (The Fish and Game Commission (commission) has divided the State into zones for hunting deer, and the commission sets the hunting period for each of these zones. Under the PLM program, the commission can authorize a hunting season on a PLM that extends beyond the general hunting season for that zone.)

Of the 25 PLMs in our sample, 2 did not involve the management of deer, 5 were not licensed in 1986, and for one PLM, the tags were not available for review. Therefore, we reviewed all the available tags for deer killed in 1986 for the 17 remaining PLMs in our sample, reviewing a total of 498 tags. For each tag, we noted the date that the deer was killed. We could not review 1987 tags for deer killed because these tags were not available at the time of our review.

We determined whether any deer kills occurred during the breeding season for the deer herds on the PLMs. We determined that 37.8 percent of all the deer that were killed in 1986 on the 17 PLMs in our sample were killed in their breeding season.

In a separate analysis, we determined how many kills occurred in the extended season by comparing the date of the kill to the general hunting period for the relevant hunting zone. If the kill did not occur within the general hunting period, we counted it as a kill occurring in the extended hunting season. We determined that 40.6 percent of all the deer that were killed in 1986 on the 17 PLMs in our sample were killed in the extended hunting season.

In March 1986, the commission adopted a policy for ensuring that when extended season hunts are approved on PLMs, comparable hunting opportunities exist for the general public in the same or adjacent hunting zones unless the Department of Fish and Game

(department) determines that such special hunts in the same or adjacent zones are not biologically or statutorily feasible. According to the assistant chief of the Wildlife Management Division, when the department determines whether a special hunt is biologically feasible, it considers factors such as the condition of the wildlife. In the case of deer, for example, the department considers factors such as the number of deer, the deer herd composition, and the deer habitat. Since the department starts planning special hunts from November for the hunting season in the following year, this policy was implemented in the 1987 hunting season. However, since data from 1987 were not available for our review, we could not provide information on this aspect of the program.

APPENDIX C

HUNTING ON PRIVATE LANDS WILDLIFE MANAGEMENT AREAS THAT ARE IN WILDLIFE REFUGES

We were asked to determine whether illegal hunting was occurring on wildlife refuges associated with Private Lands Wildlife Management (PLM) areas; however, we did not find any instances where illegal hunting occurred. Section 10502 of the California Fish and Game Code states that the Fish and Game Commission (commission) may authorize the Department of Fish and Game (department) to issue permits for taking wildlife within any refuge.

Since 1982, the commission has allowed the public to hunt antelope in Lassen County on the Hayden Hill Wildlife Refuge, which was established in the 1930's. In addition, in 1985, the commission approved a 25,000 acre PLM in Lassen County that included deer hunting. Of the 25,000 acres on this PLM, 2,300 acres are within the Hayden Hill Wildlife Refuge. In 1987, two additional PLMs with property on the Hayden Hill Wildlife Refuge were licensed for hunting waterfowl. One of the PLMs consists of 200 acres and the other consists of 520 acres. As of November 1987, the Hayden Hill Wildlife Refuge was the only refuge with PLMs in or adjacent to it.

To determine whether violations were occurring on this refuge or the associated PLMs, we reviewed all of the illegal hunting citations issued by the department in Region I, where the refuge is located, from 1984 through 1987. (See Appendix A for a map showing the location of the department's five regions.) We also reviewed the records from the department's CalTIP hotline. This hotline is for reporting violations and complaints concerning fish and wildlife resources. In addition, we interviewed wardens and wildlife management staff who were responsible for the Hayden Hill Wildlife Refuge. No citations were issued and no complaints were reported on the hotline for either the Hayden Hill Wildlife Refuge or the associated PLMs.

APPENDIX D

**THE NUMBER OF HUNTING TAGS AND SEALS ALLOCATED
TO PLMS FOR SOME WILDLIFE SPECIES
FISCAL YEAR 1985-86 THROUGH FISCAL YEAR 1987-88***

	<u>1985-86</u>	<u>1986-87</u>	<u>1987-88</u>
Number of PLMs	<u>22</u>	<u>40</u>	<u>54</u>
Species to be Hunted			
Deer	2,195	2,515	2,786
Antelope	0	7	17
Elk	16	10	6
Wild Pigs	850	425	350
Bear	0	16	4
Wild Turkey	0	230	352
Quail	<u>2,080</u>	<u>2,880</u>	<u>3,230</u>
Total Number of Tags and Seals	<u>5,141</u>	<u>6,083</u>	<u>6,745</u>

* In some cases, more tags are allocated than the number of game that can be taken.

APPENDIX E

**THE NUMBER OF DEER HUNTING TAGS ISSUED TO PLMS
COMPARED WITH THE NUMBER OF DEER HUNTING TAGS ISSUED
FOR THE HUNTING ZONE IN WHICH THE PLM IS LOCATED
FISCAL YEAR 1986-87**

<u>Hunting Zone</u>	<u>Number of PLMs in the Zone</u>	<u>Number of Tags Issued for the PLMs in the Zone</u>	<u>Total Number of Tags Issued in the Zone</u>	<u>Percent of PLM Tags to Total Tags Issued</u>
A	9	650	65,906	0.9
B-1	1	45	20,147	0.2
D2-B	3	169	4,469	3.8
D-3	2	56	12,056	0.5
D-8	1	30	9,786	0.3
D-10	1	750	1,771	42.3
D-11	1	300	6,673	4.5
D-18	3	43	3,505	1.2
X-1	3	38	12,538	0.3
X-3A	2	24	2,574	0.9
X-3B	4	60	4,610	1.3
X-4	2	16	1,716	0.9
X-5A	2	18	268	6.7
X-5B	2	30	530	5.7
X-6	1	21	3,021	0.7
X-11	3	265	13,821	1.9

Memorandum

To : Mr. Thomas W. Hayes
Auditor General
660 J Street, Suite 300
Sacramento, CA 95814

Date : April 28, 1988

File No.:


Subject: Response to
Auditor
General Draft
Report P-761

From : Office of the Secretary

We appreciate the opportunity to review the draft of your report entitled, "A Review Of The Department of Fish and Game's Private Lands Wildlife Management Area Program."

Attached are our comments on the report which were prepared by the staff of the Department of Fish and Game and approved by the Director.

In general, we concur in your recommendations and the Department of Fish and Game will take action to implement them.


Gordon K. Van Vleck
Secretary for Resources

Attachment

DEPARTMENT OF FISH AND GAME1416 NINTH STREET
SACRAMENTO, CALIFORNIA 95814

Comments on the Report
"A Review of the Department of Fish and Game's
Private Lands Wildlife Management Area Program"

Introduction

The Department of Fish and Game has determined that the future of much of the State's wildlife depends on maintaining habitat on privately owned land in a productive condition. Approximately 50 percent of the land in California is privately owned and some of the most important wildlife habitat in the State is on private land. Land use changes have reduced or eliminated wildlife habitat. Historically, incentives to landholders to manage their property for wildlife have been lacking. As a result, considerable valuable habitat has been lost to land use changes which were based on economic gains to landowners.

In 1983, the Legislature declared that it was the State's policy to encourage the propagation, conservation and utilization of fish and wildlife on private land. It authorized the Fish and Game Commission and Department to develop a private lands wildlife management area program. As implemented by the Department, the program is intended to protect and improve wildlife habitat by encouraging landowners to manage their property for the benefit of fish and wildlife. Since there are no other direct incentives, the program must be attractive to landholders if it is to succeed in accomplishing its overall objectives of benefiting wildlife. With nearly 700,000 acres of valuable wildlife habitat involved, the program is obviously successful. It has been nationally recognized as an innovative model for other states interested in protecting and improving their wildlife resources.

The Department has determined that protecting and managing wildlife habitat pursuant to this program provides benefits not only to the affected wildlife and the landholder, but also the general public. These public benefits are based on

the fact that a wide variety of wildlife, both game and nongame species, are enhanced and additional public use opportunities are provided on private lands. Migratory wildlife depend on private lands seasonally, but they use public lands as well. Benefits provided on these important private lands improve conditions of wildlife and use opportunities on public lands. The costs of producing these benefits through traditional mechanisms such as purchasing fee interest or conservation easements on private lands would be prohibitive.

Although the Department recognizes improvements in the program are needed, it provides a sound and effective mechanism for encouraging landowners to manage their property for the benefit of wildlife. In doing so, the program extends the Department's ability to manage wildlife resources throughout the State and assists in accomplishing the objectives of major programs such as deer management. This program is the only tool available to the Department to manage habitat and wildlife on private lands. With necessary adjustments which will be made, the private lands management area program will be an important part of future plans for protecting and managing our wildlife resources for the benefit of all the people of California.

Chapter I - Some of the Department of Fish and Game's Criteria for Measuring the Effectiveness of the Private Lands Wildlife Management Area Program Are Limited.

In general, the Department has implemented this program to accomplish the legislative intent while recognizing the need for flexibility. With 54 licensed areas in 17 counties ranging in size from 200 to 270,000 acres, it is difficult to develop a standard set of criteria to measure effectiveness. The report acknowledges other factors influence wildlife populations and may mask the effects of habitat management and hunting programs on licensed areas.

Therefore, effectiveness of the program must be based on ensuring that the

improvements contained in the management plans are implemented.

The Department performed required field inspections on all licensed areas. However, complete documentation for each field inspection was not available in the regional office files. In some cases, the documentation was maintained in field offices and not readily available for auditing. The Department acknowledges that a standard procedure is needed to ensure that appropriate records are developed and maintained in regional offices to clearly document field inspections and to verify that planned improvements were made.

In response to the findings contained in the report, the Department will:

1. Develop written criteria and guidelines to measure the effectiveness of the program based on ensuring that the improvements contained in the management plans are implemented. These criteria and guidelines will address effectiveness on both the program level as well as on a plan specific basis in response to unique wildlife values involved on some areas; and
2. Develop standard procedures for documenting field inspections of licensed areas for the purpose of verifying habitat improvements.

Chapter II - The Department of Fish and Game Charged Fees That Did Not Cover the Cost of Administering the Private Lands Wildlife Management Area Program.

Economic incentives to landowners, in exchange for habitat improvement and protection, are a necessary part of the program. The Department's underlying logic in establishing the initial fee structure for the program was that landowners, during their first one or two years of participation in the program, would incur most of their habitat improvement costs. The economic benefits of

their habitat improvement efforts would then be realized in subsequent years when landowners would be able to market additional hunting opportunities on their managed lands.

The legislation which established the program did not provide the Department with any staffing or funding for initial program startup costs. Because of the significant positive impact this program could have on improving and protecting the State's dwindling wildlife habitat and wildlife resources, the Department was prepared to fund the \$80,000 needed for contractual services to expedite implementation of the program and to minimize the initial fees for the program to encourage participation.

Upon the inception of the program, the fees associated with it were established by the Department at a level which would attract participants to the program yet cover the Department's increased costs attributable directly to the program excluding initial "startup costs". The expenditure of the \$80,000 in startup costs combined with the Department's overestimate of initial landowner participation in the program contributed to the deficit referred to in the report.

The Department is in the process of upgrading its cost accumulation and time tracking systems in order to provide greater accountability and to improve its financial decision making capabilities throughout the Department. These improvements will result in the capability to match all expenditures determined to be associated with the program including appropriate personnel costs, with program revenues received by the Department. Also, the Department's ability to assess the adequacy of its program fee structure will be improved.

In light of the findings contained in the report, the Department will:

(4)

1. Establish criteria for identifying costs attributable to the program;
2. Establish a system to ensure that appropriate personnel costs are charged to the program; and
3. Recommend to the Commission adjustments to the existing fee structure contained in the regulation to ensure that program revenues cover program expenditures.

Chapter III - Inconsistencies in the Regulations Governing the Private Lands Wildlife Management Area Program.

The inconsistencies identified in the report involve administrative interpretations of the statutes and wording in the regulations which is unclear. None of these inconsistencies has resulted in documented problems. However, some public confusion may have resulted from unclear wording in the regulation.

With respect to the inconsistency related to calendar year as opposed to license year, the Department determined that since the licenses are valid for three 12-month periods based on license years (July 1 - June 30), the regulation met the intent of the statute. The Department's entire hunting license and tag issuing system is based on the July-June annual cycle. Therefore, this program was patterned in a similar fashion. To do otherwise would require creating a separate system involving additional and unnecessary administrative costs to the Department and possibly greater confusion to the public.

The Department agrees that the reference in the regulation to "estimate of affected wildlife" may not be clear to the general public. As indicated by the wide variety of management plans and variation associated with the size and location of licensed areas, the affected wildlife described in plans also varies greatly. A number of management plans contain improvements intended to benefit

both game and nongame wildlife species. The regulation should clearly describe the required contents of each management plan. Both licensees and Department staff have responded to the need to consider "affected wildlife" on a case-by-case basis where appropriate. This flexibility is necessary since biological considerations and management intensity differs greatly among licensed areas.

The Department agrees that the regulation may be ambiguous in describing how payment is actually made for tags and seals issued by licensees. However, the report indicates that the Department adheres to an appropriate and consistent method of collecting fees. It appears that minor revision of this aspect of the regulation would clarify the description of the fee collection method.

In response to recommendations contained in the report, the Department will:

1. Propose appropriate amendments to the regulation to address the inconsistency between the Fish and Game Code and the regulation;
2. Develop guidelines for consistently interpreting and describing an "estimate of affected wildlife"; and
3. Propose appropriate amendments to the regulation to eliminate the apparent ambiguity between subsections related to the method for payment of hunting tags and seals issued to licensees.

cc: Members of the Legislature
Office of the Governor
Office of the Lieutenant Governor
State Controller
Legislative Analyst
Assembly Office of Research
Senate Office of Research
Assembly Majority/Minority Consultants
Senate Majority/Minority Consultants
Capitol Press Corps