December 4, 2009

The Honorable Brian Sonntag  
State Auditor  
Post Office Box 40021  
Olympia, Washington 98504-0021

Dear Auditor Sonntag:

Thank you for the opportunity to respond to the performance audit of the Washington Department of Fish and Wildlife’s (Department) Eastern Washington Pheasant Enhancement Program. The department strongly supports the use of performance audits as an important tool to improve state government, which is why we have worked so closely with the Auditor’s staff on this and past performance audits.

We agree with both issues stated in the report. The first issue confirms that pheasant populations have declined due to loss of habitat. The second issue recognizes that the department does not have adequate data to measure habitat effectiveness efforts. With the recent shift of emphasis away from raising and releasing pheasants, we will be focusing our efforts on habitat enhancement, improving harvest opportunity, and developing better ways to measure the impacts of our work.

We appreciate the Auditor’s commendation on the department’s successful efforts to rescind the part of the law that required the department to spend at least 80% of the Eastern Washington Pheasant Enhancement Account funds for pheasant rearing and release. This allows the state’s limited resources to focus on pheasant habitat and provides the flexibility to implement more effective pheasant management strategies.

Enclose is the Department’s response to the audit. We will track and report our progress on completing these tasks to the Governor.

Sincerely,

[Signature]

Philip Anderson  
Director

Enclosure

cc: Kimberly Dutton Cregeur, Office of the Governor


**Issue 1: Pheasant populations and hunting opportunities have declined due to loss of habitat.**

The Department of Fish and Wildlife concurs with Issue 1 as presented. Research conducted throughout pheasant range shows that creating and maintaining quality habitat is the most effective way to increase and maintain pheasant populations and associated recreational opportunity.

**Recommendation 1: The Program should reallocate funds to habitat enhancement and develop pilot projects to demonstrate the effectiveness of specific habitat enhancement methodologies.**

**AGENCY RESPONSE:**

The Department of Fish and Wildlife concurs with this recommendation. Using a phased reduction will allow the Department to strategically reduce releases, increase habitat enhancement efforts, and inform the public of our actions. Funding allocated to habitat enhancement will be used to help address Objective 98 in the 2009-2015 Game Management Plan; to double the amount of quality pheasant habitat in the Pheasant Focus Area by 2015.

**Action Steps and Timeframe:**

- Reduce the amount of funding devoted to purchasing pen-raised pheasants by at least 10% per year and reallocate those funds to habitat enhancement activities. The Department will begin reallocating funds beginning in 2010 with an ultimate goal of spending the majority of funds on habitat improvement activities.

- Develop specific habitat enhancement prescriptions for key habitats. General prescriptions have been developed and more refined prescriptions are being developed. Preliminary results should be available by 2011.

- Establish demonstration habitat plots on private or public lands by 2011. The Department began working on establishing demonstration plots in the fall of 2009.
**Recommendation 2:** The Program should identify and pursue additional opportunities for partnering with others to leverage habitat enhancement funding.

**AGENCY RESPONSE:**

The Department of Fish and Wildlife concurs with this recommendation. Partnerships with federal and state agencies, as well as non-governmental organizations, increase the effectiveness of limited state resources. Partnerships can improve the Department’s ability to work with landowners to improve habitat. There are also opportunities to use limited state resources to provide incentives to maximize the value of United States Department of Agriculture (USDA) Farm Bill programs that are designed to improve fish and wildlife habitat (e.g., Conservation Reserve Program (CRP)), or to improve public access in conjunction with habitat enhancements.

**Action Steps and Timeframe:**

- Annually pursue contribution agreements with the Natural Resources Conservation Service (NRCS) to increase habitat enhancement opportunities. A pilot agreement was reached in the last quarter of the 2009 Federal Fiscal Year. Additional agreements are actively being pursued.

- Pursue granting opportunities with the USDA and others. Granting rules for the USDA Voluntary Public Access Program (known as Open Fields) are due to be released in early 2010. Once a granting opportunity is available, the Department will pursue a grant with pheasant habitat and associated public hunting access as a component.

- Develop cost-share habitat and/or staffing agreements with Pheasants Forever, local Conservation Districts, or other entities on an annual basis.

**Recommendation 3:** The Department should increase pheasant hunting opportunities on private lands by addressing landowner concerns.

**AGENCY RESPONSE:**

The Department of Fish and Wildlife concurs with this recommendation. Landowner concerns vary widely and the Department must make sure that accommodations made to address the landowner’s concerns do not greatly impact general public benefit. Increasing pheasant hunting opportunity is an objective identified in the 2009-2015 Game Management Plan (Objective 100).

**Action Steps and Timeframe:**

- Document rationale for landowner resistance to public hunting on their property and summarize by 2011 and use the results to help improve hunting access.
• Develop quality private lands hunting opportunities through a variety of means. Investigate the feasibility of developing a hunting reservation system that addresses landowner concerns as well as the need for the Department to provide public benefit.

**Recommendation 4:** The Department should scale down pheasant releases in Eastern Washington with the goal of limiting releases to specific high-demand events such as youth hunts and holidays.

**AGENCY RESPONSE:**

The Department of Fish and Wildlife concurs with this recommendation. We think that a phased approach to the reduction is important so the decrease in releases and the increase in habitat enhancement spending are strategic and address the highest and best use of both released birds and habitat funding.

**Action Steps and Timeframe:**

• By 2011, utilize the Upland Game Advisory Committee and Regional WDFW staff to help identify the most effective release areas and timeframes. Annually coordinate reductions with identified priorities.

**Recommendation 5:** The Department should provide the legislature with evidence that reallocating funds from pheasant releases to habitat enhancement and hunter access is an effective use of resources.

**AGENCY RESPONSE:**

The Department of Fish and Wildlife concurs with this recommendation. We intend to provide reports as required by legislation. As stated in the program audit report, habitat enhancement provides the best opportunity to increase pheasant populations. Hunter participation tends to closely follow population trends.

It is important to note that habitat enhancements do not create immediate results, especially on a large scale. It will take time to implement habitat improvement projects (especially with existing staffing limitations) and have those improvements affect local pheasant populations. As habitat improvements are made across a larger area, more far-reaching effects can be made.

**Action Steps and Timeframe:**

• Create pheasant status reports on an annual basis. These reports will include habitat enhancement efforts, the results of population monitoring efforts, and a discussion on program effectiveness.
Issue 2: The Eastern Washington Pheasant Enhancement Program does not have the data it needs to measure the effectiveness of its habitat enhancement efforts.

The Department of Fish and Wildlife concurs with Issue 2 as presented. The precision of current harvest estimates is not adequate to measure the effectiveness of habitat enhancement efforts.

Recommendation 6: The Department should continue to survey approximately 25,000 small game hunters but should survey a higher proportion of hunters in the groups that harvest more game.

AGENCY RESPONSE:

One of the Department’s goals is to improve the precision of our pheasant harvest and hunter participation estimates, specifically in areas where it will help us measure the effectiveness of habitat enhancement efforts. We are not sure if increasing the proportion of hunters in the groups that harvest more game will accomplish that goal, but we are willing revisit our allocation formulas to see if we are allocating samples properly, and adjust if we find that changes will improve our precision.

Action Steps and Timeframe:

- Review small game harvest survey protocols to determine if changes to sampling or stratification will improve precision. Implement identified changes by 2011.

Recommendation 7: The Program should monitor pheasant populations on a local basis to measure the success of its habitat enhancement efforts and to strategize various methods to sustain pheasant populations and increase hunting opportunities.

AGENCY RESPONSE:

The Department of Fish and Wildlife concurs with this recommendation. As noted in the audit report, hunter harvest is a valid method to index population trends. However, the precision of harvest and hunter participation estimates at the county level should be improved. Funding reductions and changing priorities in the late 1990’s resulted in the curtailment of spring crowing counts and summer brood counts. Both of these techniques can be used as an index to population trends.

Action Steps and Timeframe:

- By 2011, modify the small game harvest survey to increase the precision of harvest and hunter participation estimates at the county level. Concentrate efforts in the Pheasant...
Focus Area first, and then expand efforts to other important pheasant counties as possible.

- By 2011, consider implementing crowing count and brood count surveys in the Pheasant Focus Area to improve population trend information at the county level or smaller. Survey routes have been identified and a few pilot surveys were conducted in 2009.

**Recommendation 8:** The Program should analyze the pheasant harvest and roadside count data for Grant and Adams Counties and determine the feasibility of using these data sources.

**AGENCY RESPONSE:**

The harvest information collected in these counties is collected in the same manner as the remainder of the counties in the state. Additional data analysis for these counties will not reach a different conclusion concerning the usefulness of these data. Since funding is limited, efforts to increase the precision of harvest data and to increase the number of roadside counts (i.e., crowing and brood counts) will first be directed toward making improvements within the Pheasant Focus Area (see Action Steps in Recommendation 7 above).

**Recommendation 9:** The Program should use the data it has started collecting in 2009 on harvest of released pheasants to analyze the effectiveness of pheasant releases in Eastern Washington.

**AGENCY RESPONSE:**

The Department of Fish and Wildlife concurs with this recommendation. We began collecting this data in 2009 in an effort to evaluate the effect released birds have on overall harvest estimates. Continuing to collect the data over time should allow us to investigate the impacts, if any, of reduced releases.

**Action Steps and Timeframe:**

- As part of each year’s small game harvest estimation process, develop specific statistics for banded pheasant harvest.