Observations and Recommendations from the Wildlife Management Institute Regarding Opportunities for Improved Efficiencies Between the Pennsylvania Game Commission and the Pennsylvania Fish and Boat Commission

Prepared by the Wildlife Management Institute

Purchase Order No. 4300883651

August 31, 2026

THIS PAGE INTENTIONALLY LEFT BLANK.

Key Points

A high-level assessment, not a mandate. The Wildlife Management Institute evaluated opportunities to improve the long-term sustainability of the two public-trust commissions. Nothing in the report dilutes or erodes the independent decision-making authority of either Commission or any regulatory board; these are operational considerations only and do not realign or reduce jurisdictional authority.

Foundational by design. A limited budget and short timeframe mean the scenarios warrant further, more granular evaluation before any implementation.

The fiscal reality. If nothing changes, both commissions spend more than they take in for the next ten years and draw their reserves down to critical levels; by FY34, the Game Commission will have drawn down 95% of their reserves and the Fish and Boat Commission will have exhausted theirs.

What we found:

- Pennsylvania is the only state that splits fish and wildlife across two independent commissions; the combined workforce is about 1,298.
- Most administrative functions exist in both commissions and are candidates for shared services.
- The two agencies contain roughly 221 more positions when benchmarked against agencies of a similar size. After careful agency analysis and evaluation, it is possible that the combined workforce could potentially be reduced by about 17% through unified law enforcement and reductions in overlapping executive, legal, and engineering functions, generating on the order of $34 million a year savings.
- The Game Commission operates 74 field offices against a five-state average of 29 offices.

What we recommend (20 in all; the most consequential):

- Unify PGC and PFBC law enforcement into a single structure. Comparable state wildlife agencies contain about 222 sworn officers.
- Consolidate overlapping bureaus and administrative functions and study roles to flatten the structure.
- Reduce and co-locate field offices. Comparable state wildlife agencies contain less than half the number of field offices that Pennsylvania currently has.
- Put finances on a sustainable footing: set minimum fund balances, study license-price elasticity, and evaluate funding models that broaden public contributions.
- Clear the legal path: obtain formal counsel opinions on fund-use restrictions and ask the General Assembly to authorize a joint shared-services framework with proportional cost-sharing.

Bottom line. This review produces a foundational roadmap, to be sequenced and refined by the Commissions and the General Assembly, informed by legal opinions, deeper cost analysis, and stakeholder input.

THIS PAGE INTENTIONALLY LEFT BLANK.

Executive Summary

Purpose and Background

The Pennsylvania Game Commission (PGC) and the Pennsylvania Fish and Boat Commission (PFBC) are independent administrative agencies with complementary missions, overlapping customer bases, and shared fiscal pressures. Pennsylvania is the only state in the nation where fish and wildlife management responsibilities are administered by two separate independent agencies. Recognizing that this governance structure carries both institutional strengths and operational inefficiencies, the Commissions jointly requested the Wildlife Management Institute (WMI) conduct an independent evaluation of opportunities for cooperation, shared services, and potential consolidation of select functions.

WMI conducted a similar evaluation of these same two commissions more than six decades ago (Wildlife Management Institute, 1962). The Pennsylvania Legislative Budget and Finance Committee (LB&FC) also considered the impact and feasibility of a combined fish and wildlife commission at least three times (LB&FC, 1989a, 1989b, 2003, 2014). While agency structures, fiscal complexity, and the broader conservation landscape have changed substantially over time, the foundational question of how Pennsylvania best delivers its fish and wildlife conservation mission is still relevant today and is now framed by substantially greater operational demands and fiscal uncertainty.

A Purchase Order (No. 4300883651) was issued on November 14, 2025, with a performance period through June 30, 2026. This report constitutes WMI's final deliverable under that order. Upon mutual agreement of WMI, PGC and PFBC, the performance period was extended to August 31, 2026.

Scope of the Evaluation

Consistent with the Statement of Work dated September 19, 2025, this evaluation examined six functional areas:

- Long-term projections of expenses, revenues, and funding strategies.
- Areas of overlapping or redundant administrative and operational functions and corresponding opportunities for cooperative arrangements or shared services.
- The feasibility and details of a unified fish and game conservation and boating law enforcement structure.
- Opportunities to increase efficiency among the Commissions' physical assets.
- Cost savings and improvements to service delivery that translate into greater investments and benefits to hunting, trapping, fishing, and boating and the Commissions' trust resources, customers, and staff.
- Any necessary legislative or regulatory actions required to implement such changes.

This report provides a foundational assessment of the above areas. It is a high-level assessment evaluating potential opportunities to improve the long-term sustainability of the public trust agencies in the Commonwealth. Nothing in these analyses or recommendations is intended to dilute or erode the independent decision-making authorities of either Commission or any other regulatory Board. These are only operational considerations and assessments and do not constitute any realignment or reduction of jurisdictional authority.

Findings

In plain terms, if nothing changes, because their costs are rising faster than their revenues, both Commissions are on course to spend more than they take in for the next ten years. On the current path, each commission spends down its reserves to critical levels, the Game Commission losing roughly 95% of its Game Fund balance by FY34 and the Fish and Boat Commission exhausting its combined reserves by about FY34. Without changes to revenue, spending, or both, neither agency's finances are sustainable through the coming decade.

Pennsylvania Game Commission long-term projections of expenses, revenues, and funding strategies.

WMI's model indicates that PGC future revenues from FY25-FY34 will increase 2.5% per year from PGC total FY24 revenues. WMI's model indicates that expenditures from FY25-34 will increase 4.0% per year from PGC FY24 expenditures. PGC NRRW projected revenues are based on inflation rates but could easily be greater. PGC expenditures over the 10-year period will exceed PGC revenues by $476.8 million. For comparison, the FY24 PGC Game Fund ending balance was $504.3 million. Projections indicate that both PGC Game Fund ending balance and interest earnings from those balances will be reduced by 95% by FY34. A funding strategy that uses only efficiency improvements will have to consider significant reductions in personnel and non-personnel expenditures to achieve a more sustainable balance in revenues and expenditures.

Pennsylvania Fish and Boat Commission long-term projections of expenses, revenues, and funding strategies.

WMI's model indicates that future revenues from FY25-FY34 will increase 0.4% per year from PFBC total FY24 revenues. WMI's model indicates that expenditures will increase 3.6% per year from PFBC FY24 expenditures. PFBC total expenditures will exceed PFBC revenues during the FY25-FY34 period by $162.6 million. For comparison, the FY24 combined Fish Fund and Boat Fund ending balance was $145.8 million. Projections indicate that both PFBC combined fund ending balances and interest earnings from those balances will be depleted by FY34 at the latest. A funding strategy that uses only efficiency improvements will have to reduce both personnel and non-personnel costs to be viable.

Areas of overlapping or redundant administrative and operational functions and corresponding opportunities for cooperative arrangements or shared services.

WMI reorganized the PGC staff complement and the PFBC staff complement to provide a line-by-line comparison of administrative units. Most administrative unit categories were found in both commissions and could be candidates for cooperative arrangements or shared services. Hypothetical personnel consolidations and recommendations were based on areas of redundant activities that shared business processes and regulations. Areas governed separately by the two agencies, or areas governed by separate business processes and regulations, were more conservatively approached. Regardless, each opportunity for potential consolidation of positions warrants more granular assessment that takes into consideration local conditions, customer needs, and resource issues. The combined workforce of both commissions was 1,298 in 2025, making the combined commissions one of the larger game and fish agencies in the country.

The feasibility and details of a unified fish and game conservation and boating law enforcement structure.

The combined law enforcement complement of PGC and PFBC totals 337 sworn officers as of March 2026, including vacant positions. This number exceeds the conservation law enforcement (CLE) total in any comparable state. PGC has a comparable number of sworn CLE to the other states selected for comparison. PFBC has the lowest number of sworn CLE among comparison states. The critical distinction between Pennsylvania and other states is that Pennsylvania divides CLE responsibilities between two agencies, which could reduce enforcement effectiveness during peak seasons. PA has addressed this challenge by creating a formal agreement for cross-duty law enforcement, although independent separate supervisory structures may prevent effective coordination. A unified CLE structure would streamline communication and improve efficiency. Some states have separate CLE for boating safety and were not enumerated in our study.

PGC would financially benefit from a unified enforcement structure. Based on comparison data which provides a benchmark for comparison, we believe the CLE needs of PA could be met with fewer personnel that are more focused on enforcement activities during all months of the year. PGC would benefit from new revenues contributed by PFBC for a portion of each officer's compensation in a unified program. Depending on the time-sharing agreement which would specify what portion of CLE time is charged to the PFBC Fish Fund and PFBC Boat Fund, PFBC could see some savings in personnel compensation as well. Any budget savings could be used to increase compensation for the expanded roles of existing officers, any additional equipment to ensure all CLE officers are appropriately equipped, and potentially new technician positions to do non-enforcement work previously done by CLE staff.

Opportunities to increase efficiency among the Commissions' physical assets.

PGC has 74 occupied field offices compared to an average of 29 field offices in five comparison states. PFBC has 15 field offices (plus hatchery locations) compared to an average of 19 field offices (plus hatchery locations) in five comparison states. If agency evaluations deem that a reduction in field offices is warranted, reducing the number of PGC field offices to the five-state average would reduce annual maintenance costs and eliminate some deferred maintenance needs. Co-locating PFBC and PGC staff in these offices would reduce administrative costs per office and potentially further reduce the number of field office locations occupied.

Cost savings and improvements to service delivery that translate to greater investments in and benefits to hunting, trapping, fishing, and boating and the Commissions' trust resources, customers, and staff.

Our review suggests that increased efficiencies and significant cost savings could be achieved through unified law enforcement, reductions in executive/legal counsel staffing, reductions in engineering staff, and smaller reductions in other areas of operation. An agency, if sized comparably to similar benchmarked states, would result in a 17.0% reduction in workforce in the two commissions combined and would contribute substantially to efforts to reduce personnel costs during the next 10 years. Based on combined personnel expenditures of $200 million in FY24, a savings of approximately $34.0 million ($200 million * 17.0%) annually would be realized each year. Importantly, a reduction would reset the starting point for long-term projections of personnel expenditures, assuming personnel salaries and benefit costs will continue to increase. Additional savings could be realized by examining roles and responsibilities of both commissions with a goal of flattening the organizational structure.

Any necessary legislative or regulatory actions required to implement such changes.

WMI identified four topical areas of legislative or regulatory barriers to implementation of recommended actions to improve efficiencies between the Pennsylvania Game Commission and the Pennsylvania Fish and Boat Commission. These areas were fund appropriation constraints, personnel authority provisions, cost allocations, and property use restrictions.

Summary of Recommendations

WMI's evaluation produced 20 recommendations organized around the six areas specified in the Statement of Work. These are presented in full in the Recommendations Section of this report.

WMI notes that this report represents a foundational assessment. The recommendations presented here are intended to be sequenced and refined by the Commissions and the General Assembly as a collaborative and iterative process, informed by the legal opinions, more detailed cost analyses, and stakeholder engagement. Although many of the hypothetical scenarios found in the recommendations warrant much further evaluation, the limited cost and short timeframe for this analysis were insufficient to develop them in adequate detail.

THIS PAGE INTENTIONALLY LEFT BLANK.

Table of Contents

Executive Summary 5

Purpose and Background 5

Scope of the Evaluation 5

Findings 7

Summary of Recommendations 9

List of Figures 13

List of Tables 14

Introduction 15

Background 15

Objectives 16

Scope 16

Methodology 17

Long-term projections of expenses, revenues, and funding strategies. 17

Areas of overlapping or redundant administrative and operational functions and corresponding opportunities for cooperative arrangements or shared services. 18

The feasibility and details of a unified fish and game conservation and boating law enforcement structure. 19

Opportunities to increase efficiency among the Commissions' physical assets. 19

Cost savings and improvements to service delivery that translate to greater investments in and benefits to hunting, trapping, fishing, and boating and the Commissions' trust resources, customers, and staff. 19

Any necessary legislative or regulatory actions required to implement such changes. 19

Results 21

Long-term projections of expenses, revenues, and funding strategies 21

Areas of overlapping or redundant administrative and operational functions and corresponding opportunities for cooperative arrangements or shared services. 56

The feasibility and details of a unified fish and game conservation and boating law enforcement structure. 57

Opportunities to increase efficiency among the Commissions' physical assets. 60

Cost savings and improvements to service delivery that translate to greater investments in and benefits to hunting, trapping, fishing, and boating and the Commissions' trust resources, customers, and staff. 62

Any necessary legislative or regulatory actions required to implement such changes. .65

Recommendations 68

Long-Term Financial Trends and Funding Strategy Considerations 68

Administrative and Operational Functions 68

The feasibility and details of a unified fish and game conservation and boating law enforcement structure. 69

Opportunities to increase efficiency among the Commissions' physical assets. 69

Cost savings and improvements to service delivery that translate to greater investments in and benefits to hunting, trapping, fishing, and boating and the Commissions' trust resources, customers, and staff. 69

Any necessary legislative or regulatory actions required to implement such changes. .70

Literature Cited 71

Appendix A. Organizational Charts 73

Appendix B. Statement of Work and Purchase Order 77

Appendix C. Stakeholder Engagement Methods and Findings 79

Methods 79

Findings 79

List of Figures

Figure 1. PGC Game Fund revenues by category, FY13-FY24. 21
Figure 2. PGC Game Fund NRRW revenues, FY13-FY24. 22
Figure 3. Revenue from PGC licenses and fees, FY13-FY24. 23
Figure 4. PGC base hunting license sales by year and age. Image provided by PGC. 24
Figure 5. PGC Game Fund Federal Aid reimbursement revenues, FY13-FY24. 27
Figure 6. PGC Game Fund expenditures by category, FY13-FY24. 28
Figure 7. PGC personnel costs, FY13-FY22. Data provided by PGC. 28
Figure 8. PGC non-personnel expenditures, FY13-FY22. Data points calculated from total expenditures (annual reports) and personnel costs (provided by PGC). 30
Figure 9. PGC total revenues and total expenditures, FY14-FY24. 31
Figure 10. PGC Game Fund ending balance, FY12-FY24. 32
Figure 11. PFBC total revenues by fund, FY11-FY24. 33
Figure 12. PFBC Fish Fund revenue by category, FY11-FY24. 34
Figure 13. PFBC Fish Fund license and fees revenues, FY11-FY24. 34
Figure 14. PFBC paid fishing licenses sold (data from Figure 15). Trend line indicated by dotted line. 36
Figure 15. PFBC fishing license sales by year and age. Image provided by PFBC. 37
Figure 16. PFBC Fish Fund federal and state grant revenues (including augmentation category during FY11-FY15), FY11-FY24. 39
Figure 17. PFBC Boat Fund total revenue by category, FY11-FY24. 40
Figure 18. PFBC Boat Fund license and fee revenues, including boat registrations (FY10-FY24). Trend indicated by dotted line. 41
Figure 19. PA boat registrations by year, FY16-FY24. PA boat registration data begin in FY16 and does not include earlier years included in most other PFBC revenue figures. 41
Figure 20. Recreational vessels registered by year in the United States, 2016-2024. Data from U.S. Coast Guard, 2025. Accessed July 2026. 42
Figure 21. PFBC Boat Fund federal and state grant revenues, FY10-FY24. 42
Figure 22. PFBC total expenditures by fund, FY10-FY24. 43
Figure 23. PFBC personnel expenditures (Fish Fund and Boat Fund combined), FY10-FY24. 44
Figure 24. PFBC non-personnel expenditures (budget categories of operating, fixed assets, grants, and payments to state agencies combined) for combined Fish Fund and Boat Fund, FY10-FY24. 45
Figure 25. PFBC total revenues and expenditures (combination of Fish Fund and Boat Fund), FY10-FY24. 46
Figure 26. PFBC total fund ending balance (combined Fish Fund and Boat Fund), FY15-FY24. 46
Figure 27. PGC projected revenue and expenditures FY25-FY34. 51
Figure 28. PFBC Other Revenues (combination of Fines and Penalties category and Miscellaneous Category), FY10-FY24. 53

Figure 29. PFBC projected revenues and expenditures, FY25-FY34. 56
Figure 30. Occupied office locations of PGC and PFBC staff in March 2026. 60

List of Tables

Table 1. Hunting license holders and license sales by state for 2025 apportionment year (2023 license year). 26
Table 2. PGC staffing complement by organizational unit.[1] 29
Table 3. Fishing license holders and license sales by state for apportionment year 2025 (2023 license year). 35
Table 4. PFBC staffing complement by organizational unit. 44
Table 5. PGC future revenue and expenditures, FY25-FY34. Negative numbers are in red or are in parentheses. 50
Table 6. PFBC projected revenue and expenditures, FY25-FY34. Negative numbers are in red or are in parentheses. 55
Table 7. Staffing complement in PGC and PFBC in 2025. Green highlights indicate administrative units that are overlapping or redundant in both commissions. 56
Table 8. Comparison of PGC law enforcement metrics with similar states. Conservation law enforcement is abbreviated as CLE. Ohio and New York have boating-related enforcement in other agencies. 58
Table 9. Comparison of PFBC law enforcement metrics with similar states. Conservation law enforcement is abbreviated as CLE. 58
Table 10. Number of wildlife field offices and fisheries field offices in MI, OH, PA, MN, WI, and NY. Number includes regional offices. Some offices have both wildlife and fisheries field staff co-located. 61
Table 11. Potential position reductions based on benchmark comparisons with five similar states and areas of significant overlap between commissions. 64
Table 12. Participation in the SWOT survey and the senior staff and board interviews, February and March 2026. 79
Table 13. SWOT survey and interview findings. 79

Introduction

Background

The Pennsylvania Fish and Boat Commission and the Pennsylvania Game Commission requested a proposal from the Wildlife Management Institute to complete an evaluation of the commissions following a Statement of Work dated September 19, 2025. WMI provided a proposal on October 28, 2025, that was subsequently approved. A Purchase Order (No. 4300883651) was issued on November 14, 2025. The order was valid from November 14, 2025, through June 30, 2026. A 2-month extension was granted, extending the order until August 31, 2026.

WMI conducted a similar evaluation of the two commissions over six decades ago (Wildlife Management Institute, 1962). While much has changed in the six decades since that review in agency structure, fiscal complexity, recreational participation trends, and the broader conservation landscape, the foundational question of how Pennsylvania best delivers its fish and wildlife conservation mission remains as relevant today as it was then and is now framed by substantially greater operational demands and fiscal constraints.

The Pennsylvania Game Commission (PGC) is an independent administrative commission established by Act 1895-187. This act created the Board of Game Commissioners to "protect and preserve the game, song and insectivorous birds and mammals of the state" and to "enforce the laws of this Commonwealth relating to the same." Act 1897-103 sets forth actions prohibited by law and penalties for such actions. Act 1937-316 consolidated the game laws and changed the name of the Board of Game Commissioners to the PA Game Commission. Act 1986-93, which became effective on July 1, 1987, codified the game laws into the Game and Wildlife Code. The PGC's mission is "To manage and protect wildlife and their habitats while promoting hunting and trapping for current and future generations."

The Pennsylvania Fish and Boat Commission (PFBC) is an independent administrative commission established in 1866 with authority to administer and enforce the Fish and Boat Code (codified in Act 1980-175) and other commonwealth laws relating to (1) the encouragement, promotion, and development of fishery interests; (2) the protection, propagation, and distribution of fish; (3) the management of boating and the operation of boats; and (4) the promotion and development of recreational boating. The PFBC's mission is "to protect, conserve, and enhance the Commonwealth's aquatic resources and provide fishing and boating opportunities."

Independent administrative commissions in Pennsylvania differ from other state government agencies in several important ways. Independent administrative commissions are not under the Governor's jurisdiction, but they must adhere to all policies, procedures, and rules of state government. They are responsible for specific functions and tasks that are not typically handled by other state agencies, have the authority to set policy, regulate and oversee their own operations within Commonwealth laws and procedures, and are tasked with ensuring that their regulations and decisions are in the public interest and cost effective.

Pennsylvania remains the only state in the union that has separate fish and wildlife agencies. The commissions are undertaking this evaluation of opportunities for cooperation, shared services, and potential consolidation of select functions to maximize investments in the commissions' trust resources, achieve efficiencies that benefit customers and staff, and preserve independent and specialized board governance.

Objectives

The overall goal of this project was to identify opportunities for cooperation, shared services, and potential consolidation of select functions between PGC and PFBC. This goal would be accomplished by evaluating (as detailed in the PA Statement of work):

a. Long-term projections of expenses, revenues, and funding strategies.
b. Areas of overlapping or redundant administrative and operational functions and corresponding opportunities for cooperative arrangements or shared services.
c. The feasibility and details of a unified fish and game conservation and boating law enforcement structure.
d. Opportunities to increase efficiency among the Commissions' physical assets.
e. Cost savings and improvements to service delivery that translate to greater investments in and benefits to hunting, trapping, fishing, and boating and the Commissions' trust resources, customers, and staff.
f. Any necessary legislative or regulatory actions required to implement such changes.

Scope

The vendor was tasked with providing a full range of professional consultative services to gather relevant and necessary information to conduct the analysis described above. Services included research into other organizations' structures; analysis of administrative, financial, operational, and programmatic functions; analysis of personnel reports; and other consultant services as identified by the Commissions. Organizational charts, functional statements, annual reports, financial reports, strategic plans, and other resources necessary to conduct this analysis were provided by each Commission.

Methodology

Long-term projections of expenses, revenues, and funding strategies.

Recent trends in expenses and revenues.

To prepare the financial analysis of PGC and PFBC past revenues and expenditures, we obtained data from Commission annual reports, internal agency reports, web-based sources, and personal communications with staff. PFBC revenues and expenditures were obtained from PFBC annual reports available online (Pennsylvania Fish and Boat Commission, 2011-2024). PGC revenues and expenditures were obtained from PGC annual reports available online (Pennsylvania Game Commission, 2013-2024). Certified numbers of licensed hunters and anglers, and associated revenue, were obtained from USFWS online resources (U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Program, 2026). Pennsylvania population estimates were obtained from Pennsylvania Vital Statistics - 2023, published in 2025 as the most recent data available (Pennsylvania Department of Health, 2025). This analysis also drew on previous performance audits of both agencies conducted by the Pennsylvania Legislative Budget and Finance Committee.

Projections of future expenditures, revenues, and funding strategies.

The PA Statement of work referred to “long-range” projections of revenues, expenses and funding strategies. WMI created projections of future revenues and expenditures for each commission for a 10-year period (FY25-FY34).

Significant sources of revenues were determined for each agency. On average, ninety-three percent (93%) of PGC revenues come from hunting license revenues category (21%), federal revenues category (18%) and the Natural Resources and Rights-of-Way (NRRW) category (54%), which includes gas and oil lease revenues. Five other revenue sources were the remaining 7% of PGC revenues. On average, 61% of PFBC revenues came from licenses, permits, fees, and boat registrations. State and federal grants averaged 24% of revenues. Together these two categories provided 85% of the PFBC total revenues. Miscellaneous revenues and revenues from fines and penalties were the remaining 15% of PFBC total revenues.

WMI examined historical sales of hunting (Figure 4) and fishing licenses and fees (Figure 15) as well as boat registrations and launch permits to project trends in sales of these items. While increases in prices may occur, we assumed that PFBC and PGC would continue to offer the same suite of licenses, registrations, and permits at the same fee structure as existed in 2024. Thus, trends in future revenue would be driven entirely by demand for the licenses and registrations, and not by changes in the costs of required licenses, fees, and registrations.

WMI also examined trends in historical sales of fishing and hunting licenses at the national level (U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Program 2026).

National trends in boat registrations were obtained from the U.S. Coast Guard report (U.S. Coast Guard, 2025). These results were used to further inform projections of demand for PA fishing and hunting licenses and boat registrations.

Projections of revenue from federal sources (PR, DJ, SWG, etc.) are not provided by the federal administrators of these funds. WMI based projections of future revenues in PA from historical figures found in commission annual reports and the associated trend lines. WMI also examined trends in overall expenditures from federal funding sources to the commissions to inform estimates for each commission.

PGC revenue from NRRW in recent years (FY18-FY24) served as the basis for projecting revenues from this source. WMI also examined online sources information about oil and gas development in PA for insights on the sustainability and reliability of this funding category.

WMI consolidated expenditures into two categories: personnel costs and all other costs. We projected personnel expenditures based on historical data. Historical expenditures for non-personnel (supplies, materials, contracts, and services) categories for the two commissions were obtained from published annual commission reports and data provided by commissions upon request. Estimates of future inflation (2.9% per year) were based on the average CPI during 2015-2024 (Coinnews Media Group, 2026). For comparison, the official United States inflation rate for the next 10 years is 2.4% per year (Federal Reserve Bank of Cleveland, 2026). We chose the CPI estimate of inflation average from 2015-2024 as it reflects the effects of the Covid outbreak and the beginning of the Russia/Ukraine conflict. The official US inflation estimate will also likely be influenced by current world issues, although in unknown ways for an unknown length of time. WMI considered the known recent past to be a better predictor of inflation than the official US inflation estimate for the next 10 years.

This project was based on a desire to determine whether a funding strategy that relied on increased efficiencies in both commissions could delay or eliminate the need for increased hunting license fees, fishing license fees, and boat registration and launch permit fees.

Areas of overlapping or redundant administrative and operational functions and corresponding opportunities for cooperative arrangements or shared services.

We examined 2025 organizational charts for each commission. PFBC salaried staff complement data for FY25 were obtained from Legislative Audit reports. PGC provided comparable staffing information upon request (Kelly M. O’Donnell, Deputy Director of Administration, PGC. personal communication).

WMI evaluated the overlap between commissions based on our collective experience working in agencies where fisheries and wildlife programs are housed in the same agency. These comparisons were the basis for assessments of opportunities for cooperative arrangements or shared services.

The feasibility and details of a unified fish and game conservation and boating law enforcement structure.

We examined attributes of conservation law enforcement in states comparable to Pennsylvania in size, hunter and angler numbers, and species managed, including Michigan, Minnesota, New York, Ohio, and Wisconsin. These are all states that border the Great Lakes and have a blend of northern forest types and agriculture. The selected states are among the top 10 states for paid hunting license holders (except Ohio at number 14), and rank between number 5 and number 13 in paid fishing license holders among the 50 states. All have both warm-water and cold-water fisheries and hatcheries that support recreational angling. WMI contacted each state to verify current information during March 15-30, 2026.

Opportunities to increase efficiency among the Commissions' physical assets.

WMI examined PGC and PFBC websites for locations of offices, hatcheries, and regional boundaries, and requested occupied office location information directly from both agencies. J. Whitacre (PGC) provided a .pdf map of locations for both commissions. WMI did not request or receive additional information about facility ownership, age, maintenance condition and other attributes affecting occupancy.

WMI examined agency websites for Michigan, Minnesota, New York, Ohio, and Wisconsin for the number of field offices occupied by fisheries staff and wildlife staff. This number did not include hatcheries or research stations. The number of offices is unique for fisheries or wildlife, although many offices apparently had co-located staff who dealt with fisheries issues and wildlife issues. The number of co-located offices was not determined for each state. WMI was able to contact agency personnel in most states to confirm the office information during August 2026.

Cost savings and improvements to service delivery that translate to greater investments in and benefits to hunting, trapping, fishing, and boating and the Commissions' trust resources, customers, and staff.

WMI examined the organizational charts and position titles of both agencies to identify opportunities for consolidation and coordination to achieve the desired outcome expressed in the section title.

Any necessary legislative or regulatory actions required to implement such changes.

Based on the findings of our evaluation, we reviewed both 30 PA CSA and 34 PA CSA to identify statutory and legislative issues that would be required to implement our findings. Once identified, these additional issues were verified against primary sources by WMI staff. All findings, analyses, recommendations, and professional judgments are solely those of the author(s).

Results

Long-term projections of expenses, revenues, and funding strategies

Recent trends in expenses and revenues.

Pennsylvania Game Commission (PGC) trends in Game Fund revenues and expenditures.

WMI reviewed revenue for PGC Game Fund for FY13-FY24 based on PGC Annual Reports (Pennsylvania Game Commission, 2013-2024). Total PGC Game Fund revenues ranged from a low of $97.9 million in FY13 to a high of $448.3 million in FY22 (Figure 1). Fifty-four percent of total revenues during this period came from the Natural Resources and Rights-of-Way (NRRW) category, which includes gas and oil lease revenues. License revenues were 21% of PGC Game Fund revenues while PGC Game Fund federal aid reimbursements contributed 18%. Together, these three categories provided 93% of PGC revenues during FY13-FY24. Five other revenue sources were the remaining 7% of PGC revenues in the FY13-24 revenues. For the first time, interest income exceeded license revenues in FY24. No state general funds were received by PGC.

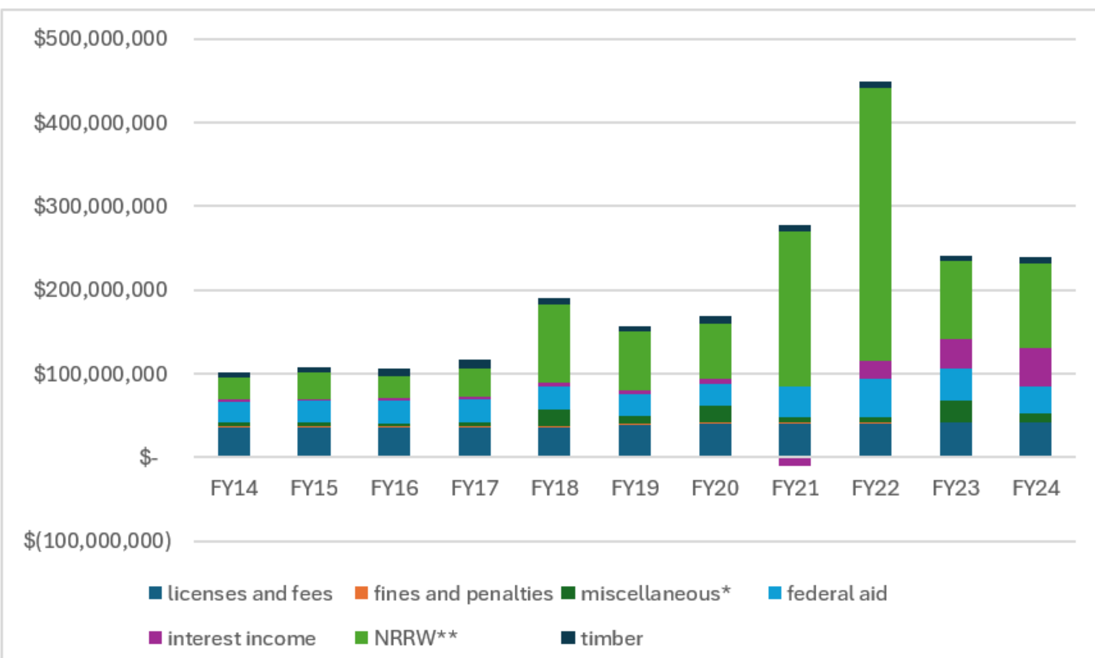


Figure 1. PGC Game Fund revenues by category, FY13-FY24.

** The Game Commission's revenues are generally broken down into licenses and fees, fines and penalties, federal aid, interest income, and NRRW and Miscellaneous. The "Miscellaneous" category is not a primary revenue source but rather a catch-all for items that do not neatly fit into these main categories. ** NRRW is an abbreviation for Natural Resources and Rights of Ways. Revenues in this category are generally from activities associated with gas and oil leasing on PGC lands.*

PGC Game Fund NRRW revenues increased from $7.2 million in FY 13 to $326 million in FY22 (Figure 2). This was followed by two years of revenues around $100 million (FY23-FY24). The trend was a growth rate of 208% annually, obviously influenced by the high values in FY21 and FY22. The average annual revenues during the years of FY18, FY19, FY20, FY21, FY23, and FY24, excluding the FY22 value of $326 million, was $101.4 million.

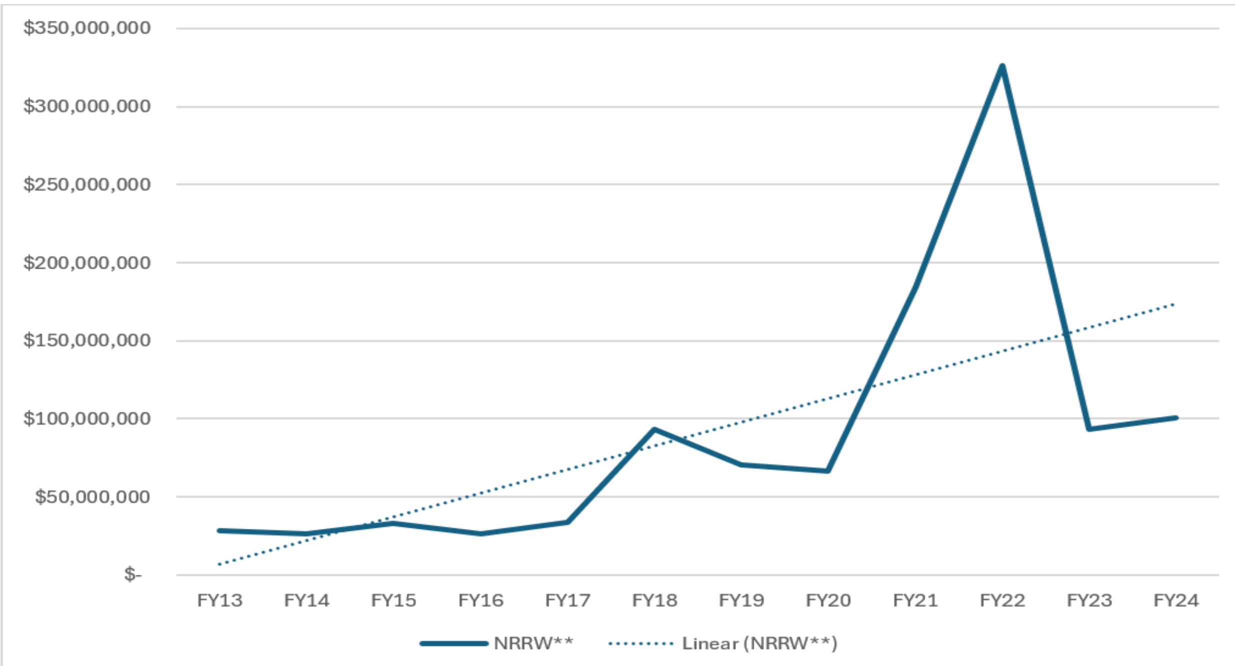


Figure 2. PGC Game Fund NRRW revenues, FY13-FY24.

Revenues from PGC licenses and fees ranged from a low of $35.2 million in FY14 to a high of $41.1 million in FY24, averaging $37.9 million (Figure 3). On average, revenues increased 1.7% per year during FY13-FY24.

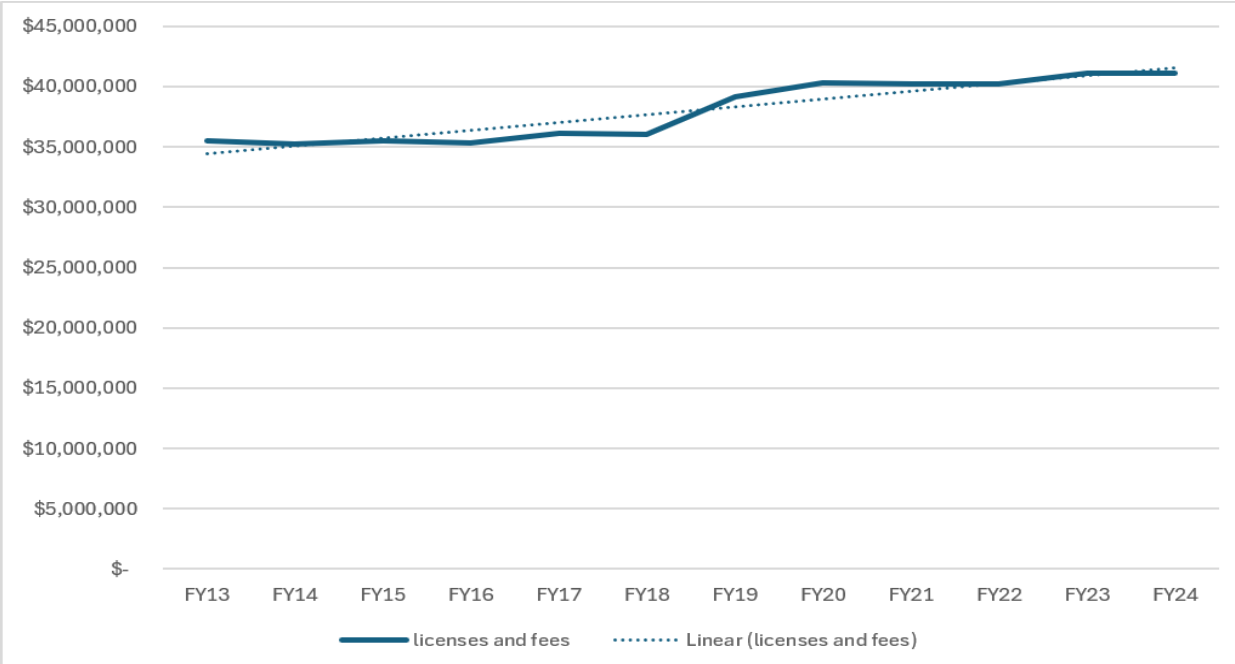


Figure 3. Revenue from PGC licenses and fees, FY13-FY24.

PGC paid license numbers during FY13-FY25 ranged from a high of 944,686 in FY13 to a low of 827,968 in FY25 (Figure 4, FY25 data were provided by PGC). Pennsylvania ranked second in the country in hunting license numbers in FY23 (Table 1). Recruitment of new hunters has been challenging nationally, leading to substantial investment in Recruitment, Retention, and Reactivation (R3) programs by many state agencies.

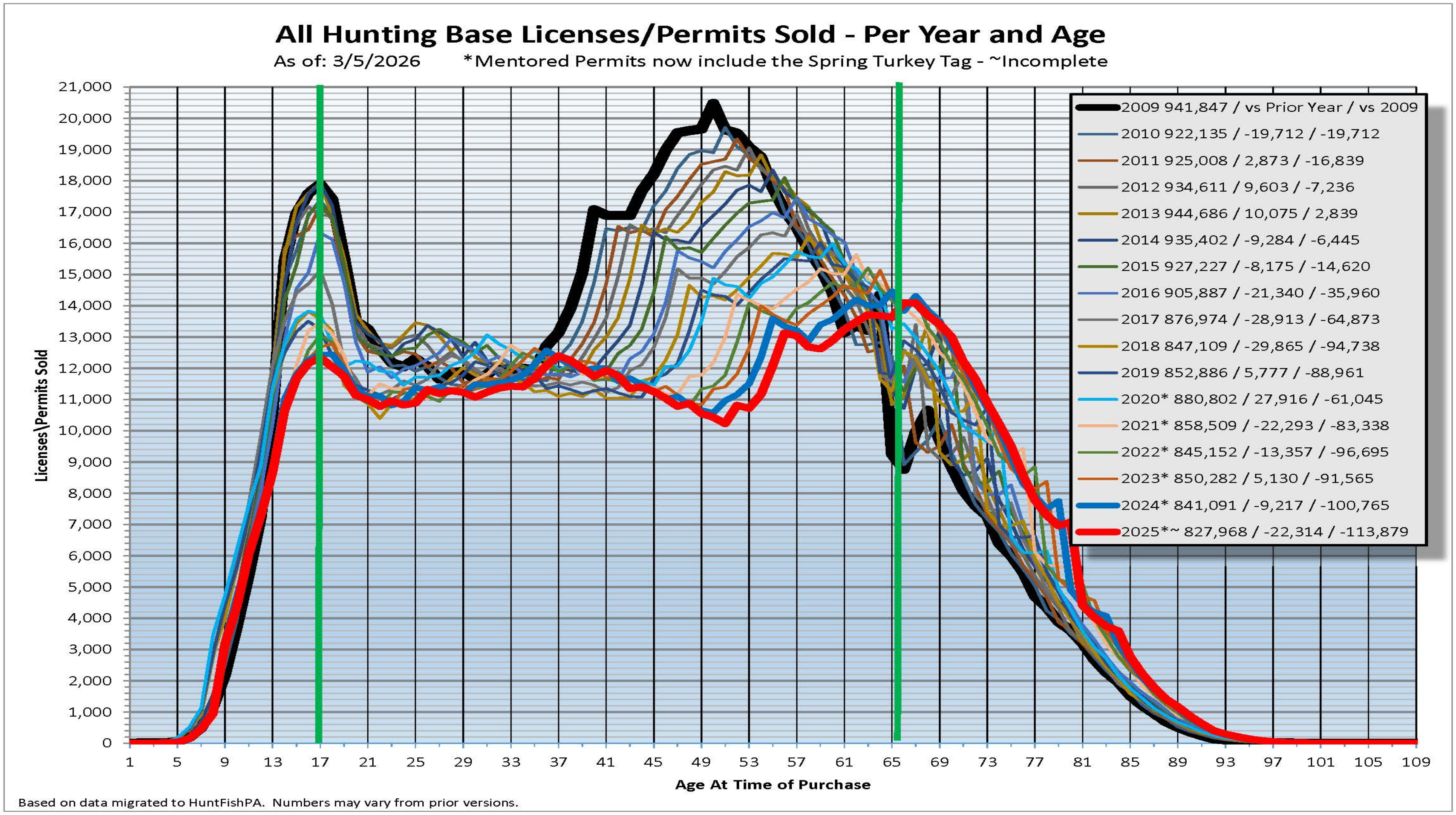


Figure 4. PGC base hunting license sales by year and age. Image provided by PGC.

PGC offers two types of Senior resident hunting licenses: a $13.97 Senior Resident Annual Hunting License and a $51.97 Senior Resident Lifetime Hunting License. A $101.97 Senior Resident Lifetime Combination License is also available. Hunting license purchases decline beginning at age 65 (Figure 4). These license sales to buyers age 65 and older primarily represent the purchase of Senior Lifetime Licenses, which are valid for multiple years. Lifetime holders apply for free renewal licenses each year to receive valid harvest tags, so a senior who purchases a lifetime license contributes no additional license revenue in subsequent years. PGC Hunting License Sales Reports record 138,844 first-time Senior Lifetime and Senior Lifetime Combination licenses sold from 2010 through 2021.

WMI estimates that continuing the Senior Resident Lifetime Hunting License foregoes on the order of $1.5 million to $2.5 million in state license revenue annually. Because the $51.97 lifetime license is federally certified over an 18-year useful life, it returns approximately $2.89 per year in state revenue, compared with $13.97 for a Senior Resident Annual Hunting License and $20.97 for the current standard resident adult hunting license. The number of hunters affected is read directly from PGC's age-structured sales data: approximately 140,000 to 150,000 hunters age 65 and older obtain a license each year (Figure 4), most of them Senior Lifetime holders renewing at no cost. The lower end of the revenue range assumes these hunters would otherwise purchase a Senior Annual license each year; the upper end assumes they would purchase a standard resident adult license. Both ends are upper-bound estimates in two respects: the age-65-and-older count includes the smaller number of seniors who hold one-year licenses rather than lifetime licenses, so it is a ceiling on the lifetime pool; and it assumes every such hunter would continue to buy a license each year, when some would reduce or discontinue participation. The realized loss would therefore be lower.

The estimate reflects state license revenue only and would move proportionally if the affected pool differs from the age-structured count used here. Federal aid is captured during the certification period; however, continued reliance on near-free lifetime licenses poses a potential erosion of the Commonwealth's federal Wildlife Restoration (Pittman-Robertson) apportionment, which is based substantially on the number of paid hunting license holders. Hunters who continue to hunt beyond the certification period are no longer counted in that base, reducing Pennsylvania's share of national funds over time as the senior hunter cohort grows. This dynamic is compounding: since 2009 the total base has fallen by roughly 100,000 hunters, with the most recent years still incomplete, and the loss is concentrated in the full-price band between ages 17 and 64 while the senior cohort has held relatively steady (Figure 4). Discounted hunters therefore represent a growing share of a shrinking paying base.

Federal and state grants are a substantial component of Game Fund revenues (Figure 1). For Federal Fiscal Year 2025, the U.S. Fish and Wildlife Service apportioned more than $1.3 billion in Wildlife and Sport Fish Restoration funding nationally, up from approximately $1.2 billion in 2023. Wildlife Restoration funds are apportioned half on a state's share of national land area and half on its share of paid hunting license holders, with no state receiving more than 5 percent or less than 0.5 percent of available funds. As the nation's second-largest hunting-license state, Pennsylvania's apportionment approaches the 5 percent statutory maximum.

Table 1. Hunting license holders and license sales by state for 2025 apportionment year (2023 license year).								
State	Size (sq. miles)	2024 Population	2023 Paid Hunting License Holders	2023 Paid Hunting License Ranking	2023 Resident Hunting Licenses Sold	2023 Nonresident Hunting Licenses Sold	2023 Ratio of Hunters to State Population	2023 Density of Hunters per Sq. Mile
Michigan	56,539	10,140,459	625,517	6	2,010,156	86,796	0.06	11.06
Ohio	40,953	11,883,304	354,922	14	735,040	97,217	0.03	8.67
Pennsylvania	44,820	13,078,751	1,016,946	2	2,478,674	125,413	0.08	22.69
Minnesota	79,617	5,793,151	532,443	9	1,332,206	56,108	0.09	6.69
Wisconsin	54,314	5,960,975	655,095	5	4,188,626	281,619	0.11	12.06
New York	47,224	19,867,248	541,680	8	961,867	76,119	0.03	11.47
Texas	261,914	31,290,831	1,110,678	1	1,673,653	82,922	0.04	4.24
State area and publicly owned data: Natural Resources Council of Maine (1991).								
All hunting and fishing license data: U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Program (2026).								
The Apportionment year is TWO YEARS AFTER states issued licenses, so costs and number of license holders for 2025 represent license sales that occurred in 2023.								
State population data: U.S. Census Bureau (2025).								
Ratio of hunter license holders to state population includes nonresident hunting license holders, so value is not a percent of state's population who hunt.								
Some hunters may hold more than one hunting license.								

Revenue from PGC Game Fund Federal Aid ranged from $20.2 million in FY13 to $46.2 million in FY22 (Figure 5). On average, PGC Game Fund federal aid revenue increased 7.0% per year.

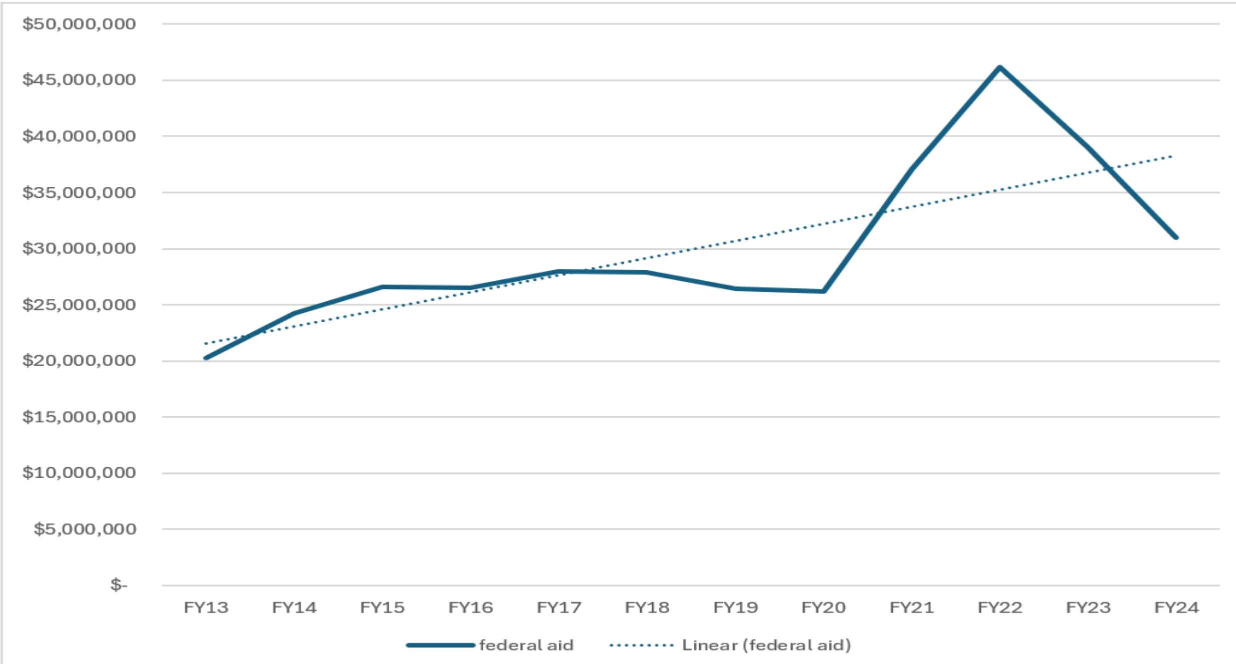


Figure 5. PGC Game Fund Federal Aid reimbursement revenues, FY13-FY24.

Total PGC Game Fund expenditures have increased in recent years (Figure 6). Wildlife habitat management represented 36% of expenditures, wildlife law enforcement 21%, and administration 18% during this time.

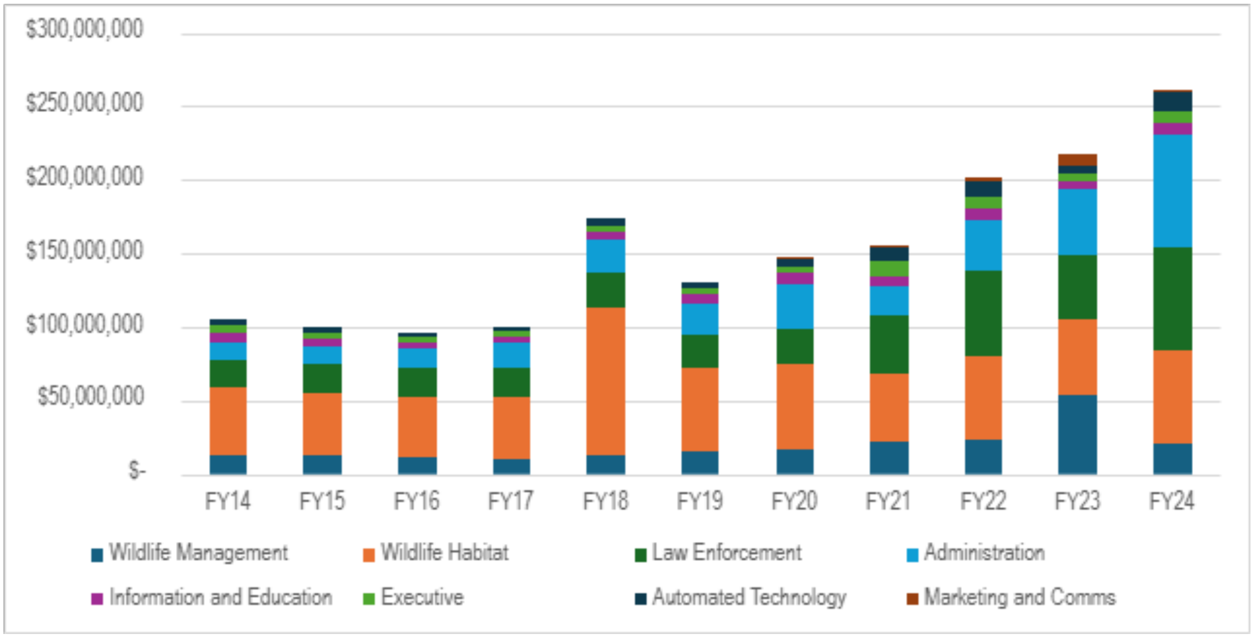


Figure 6. PGC Game Fund expenditures by category, FY13-FY24.

PGC personnel expenditures averaged 58% of PGC total expenditures during FY13-FY22 (Figure 7), ranging from 41.9% (FY18) to 72.2% (FY15). The total staff complement grew from 835 positions in 2019 to 1,105 in 2025, an increase of 32 percent (Table 2). The filled staff complement also increased.

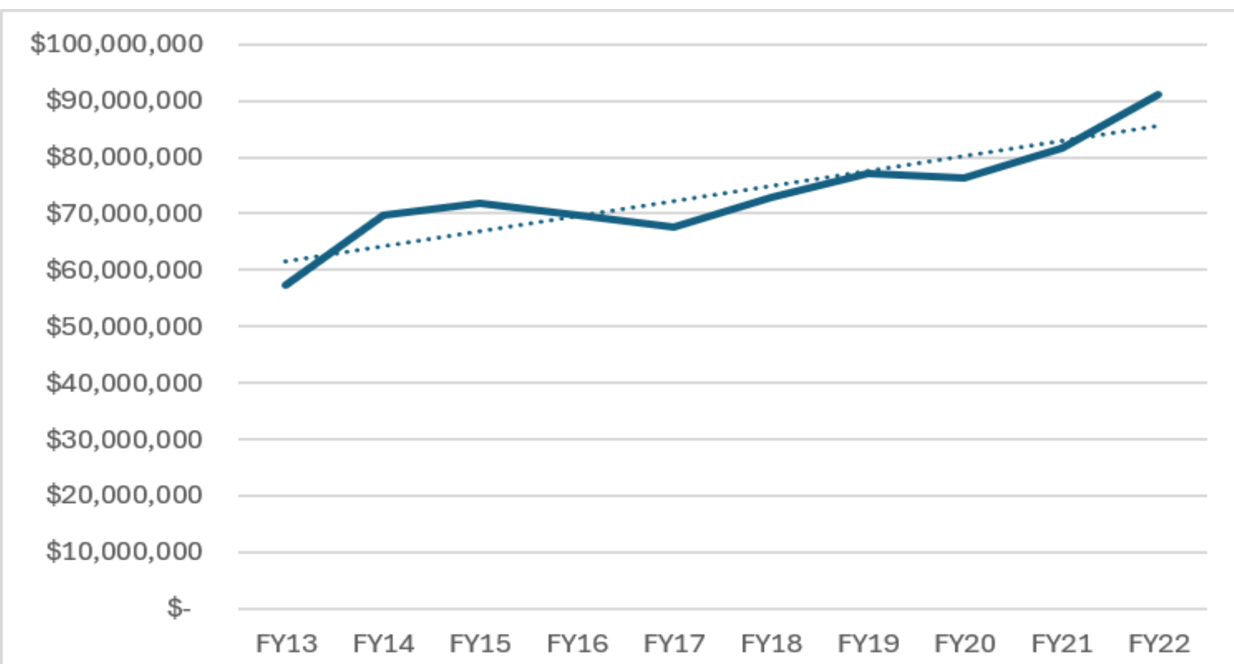


Figure 7. PGC personnel costs, FY13-FY22. Data provided by PGC.

Table 2. PGC staffing complement by organizational unit.[1]						
PGC Organizational Unit	2019 Total[2]	2019 Filled[2]	2022 Total[2]	2022 Filled[2]	2025 Total[2]	2025 Filled[2]
Executive Office	**6**	**5**	**5**	**5**	**12**	**10**
Office of Chief Counsel	4	3	7	5	6	4
Legal Office	1	1	1	1	1	1
Human Resources Office	7	7	9	8	10	8
Training (Executive)[3]	35	3	45	28		
Bureau of Administrative Services	**2**	**2**	**24**	**2**	**11**	**2**
Fiscal Management Division	4	3	5	5	6	6
Human Resources Division					1	1
License Division	5	5	7	7	8	8
Contract & Procurement Division	4	4	6	4	7	5
Office Services Division	6	5	6	4	6	6
Bureau of Information and Education	**7**	**7**	**5**	**4**	**6**	**6**
Research/Education/HTE Outreach Division	7	7	5	4	8	7
Publications Division	5	5	5	5	5	4
Public Info & Media / Soc Sci & Cons Ed Division	3	3	3	2	4	3
Bureau of Wildlife Management	**5**	**5**	**28**	**3**	**42**	**3**
Game Management Division	51	20	26	19	38	19
Wildlife Operations / Services Division	25	20	25	21	23	20
Wildlife Diversity / Recovery Division	9	8	9	6	10	8
Wildlife Admin Division			4	4	4	4
Wildlife Health Division					2	2
Bureau of Law Enforcement	**3**	**3**	**3**	**3**	**3**	**3**
Special Operations Division	8	7	9	9	9	9
Enforcement Division	2	2	2	2	2	1
Special Permit Enforcement Division	2	2	2	2	2	2
Administrative Division	3	3	3	2	3	3
Communications / Centralized Dispatch Division	3	2	38	24	51	42
Training Division (Law Enforcement)[3]					45	35
Bureau of Wildlife Habitat Management	**2**	**2**	**2**	**2**	**2**	**2**
Engineering Division	6	6	7	4	9	8
Habitat Planning & Development Division	9	5	6	6	5	5
Forestry Division	13	9	10	9	12	11
Real Estate Division	15	13	18	15	19	18
Environmental Planning & Habitat Protection Division	9	7	5	5	7	4
Bureau of Marketing & Strategic Communications			**2**	**1**	**2**	**2**
Shooting Sports Division					4	4
Strategic Communications & Outreach Division			7	5	4	4
Marketing Division			4	3	3	3
Digital Communications Division			6	3	5	5
Bureau of Automated Technology Services	**2**	**2**	**2**	**2**	**2**	**2**
Technical Services Division	10	10	11	11	13	13
Data Resources Division	6	6	4	4	5	4
GIS Services Division			9	8	11	9

Table 2. PGC staffing complement by organizational unit.[1]						
PGC Organizational Unit	2019 Total[2]	2019 Filled[2]	2022 Total[2]	2022 Filled[2]	2025 Total[2]	2025 Filled[2]
Regional Offices						
Northwest Region	97	91	108	96	116	101
Southwest Region	90	82	95	89	110	101
Northcentral Region	100	89	103	88	124	110
Southcentral Region	91	84	92	78	108	103
Northeast Region	96	89	103	97	119	105
Southeast Region	82	69	89	78	100	91
Total	**835**	**696**	**965**	**783**	**1,105**	**927**
Cadet positions[4]	32	0	40	23	40	30
[1] Source: Jennifer Wert, Human Resources Office, PGC. Personal communication. Data was in raw form and was summarized by WMI.						
[2] Difference between Total and Filled are vacancies.						
[3] Training (Executive) - org unit 00231300 was housed under the Executive Office area in 2019 and 2022. As of June 2025, it has been moved to the Bureau of Law Enforcement as Training Division (org 00235900).						
[4] The 2019 figure of 32 positions includes 32 vacant Wildlife Conservation Officer cadet slots; in 2022 it includes 22 cadets (5 filled + 17 vacant per single line items).						

PGC non-personnel expenditures were 42% of PGC total expenditures during FY13-FY22 (Figure 8), ranging from a low of $26.8 million in FY16 to $110 million in FY22.

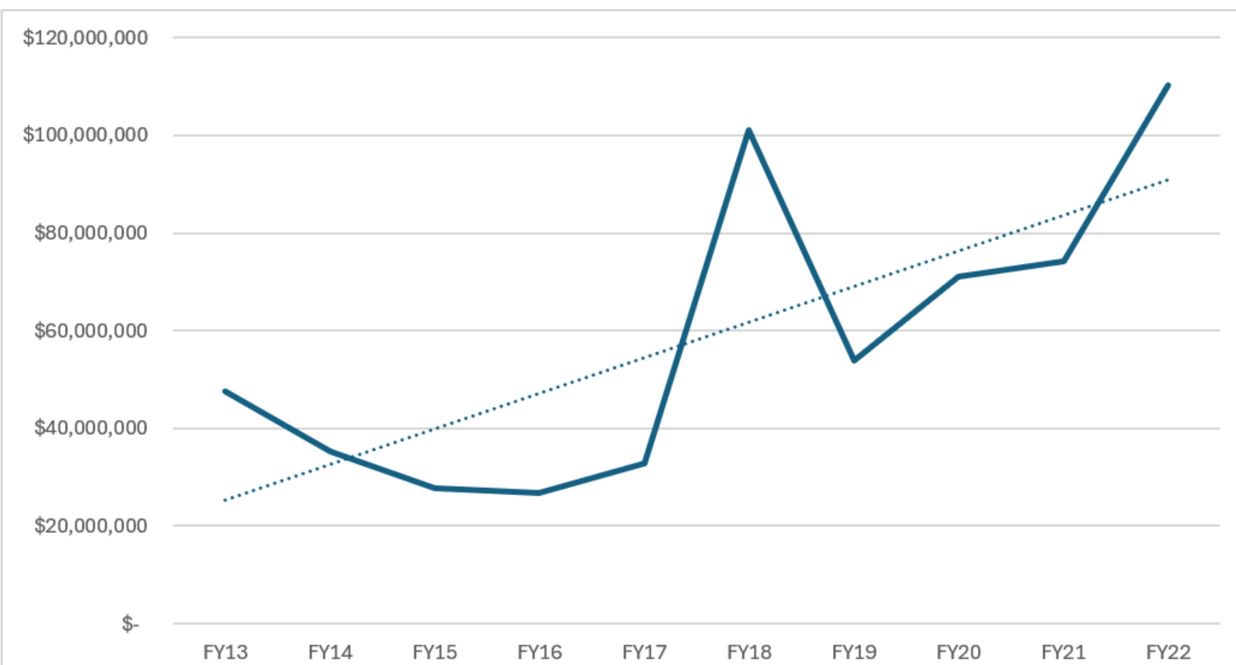


Figure 8. PGC non-personnel expenditures, FY13-FY22. Data points calculated from total expenditures (annual reports) and personnel costs (provided by PGC).

PGC annual revenues have generally exceeded annual expenses except FY13, FY14, and FY24 (Figure 9). During the same time, PGC was able to increase the PGC Game Fund balance at the end of each fiscal year (Figure 9). The PGC Game Fund ending balance in FY24 was approximately two times expenditures from the fund in the same fiscal year (

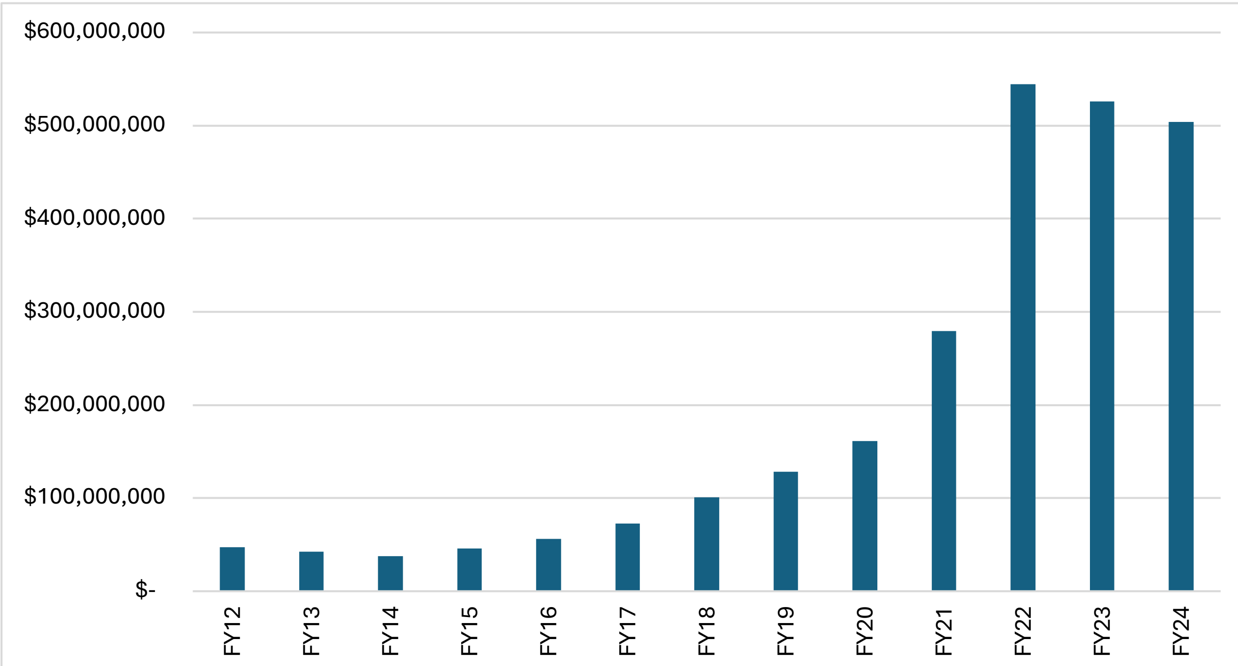


Figure 10).

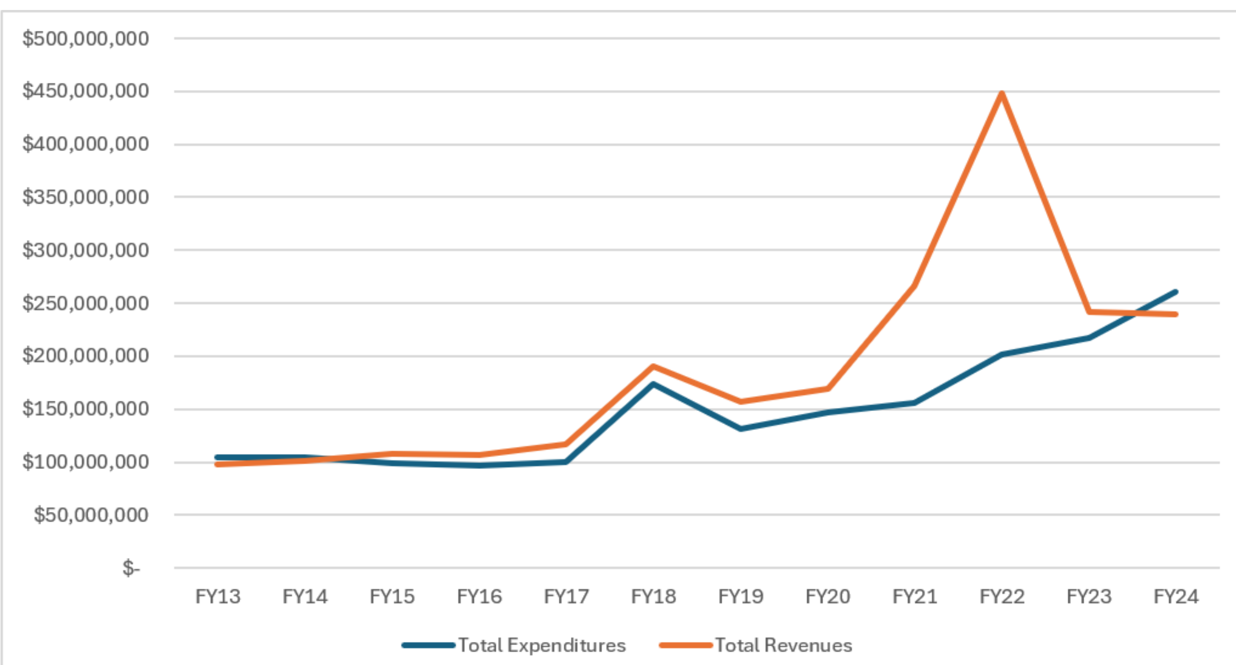


Figure 9. PGC total revenues and total expenditures, FY14-FY24.

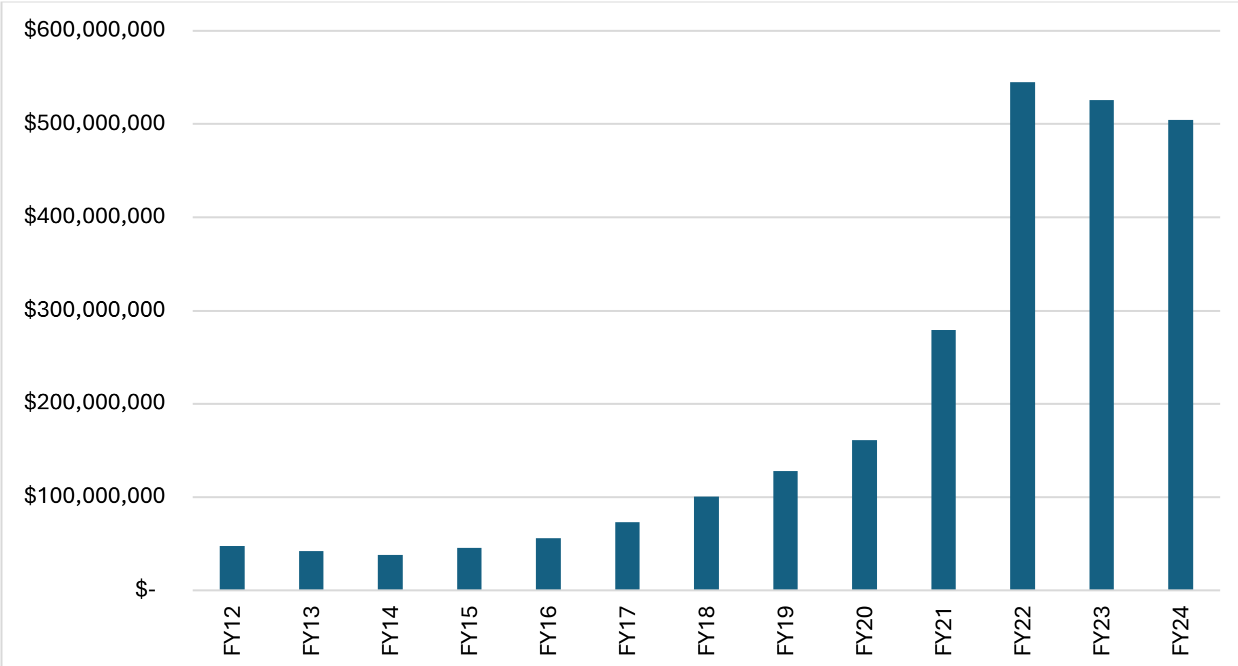


Figure 10. PGC Game Fund ending balance, FY12-FY24.

Pennsylvania Fish and Boat Commission recent trends in revenues and expenditures.

We reviewed revenue for PFBC for FY11 through FY24 based on PFBC Annual Reports (Pennsylvania Fish and Boat Commission, 2011-2024). PFBC revenue are deposited into the Fish Fund and the Boat Fund. Total revenue ranged from a low of $49.9 million in FY14 to a high of $73.5 million in FY23, averaging $57.9 million (Figure 11). The trend in revenue over this time was a positive 3.2% per year. No state general fund tax dollars were used by the agency.

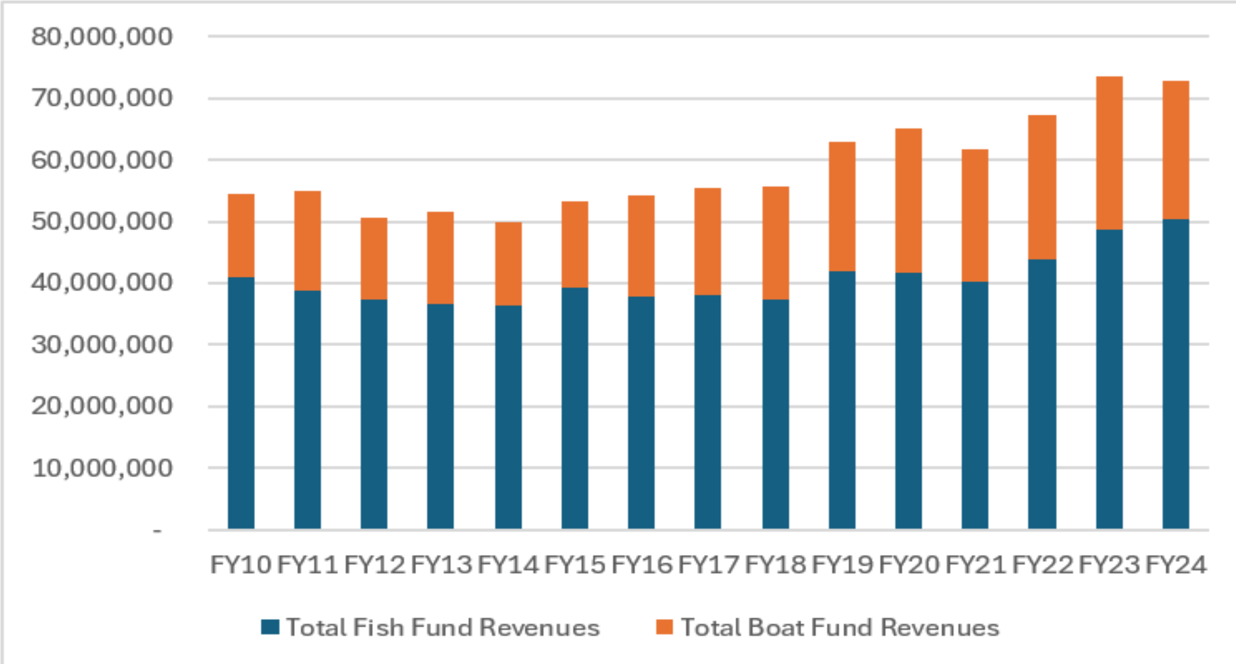


Figure 11. PFBC total revenues by fund, FY11-FY24.

Fish Fund

PFBC Fish Fund revenue averaged $40.6 million per year, ranging from $36.4 million in FY14 to $50.4 million in FY23 (Figure 12). Sixty-eight percent (68%) of Fish Fund revenues came from license and fee sales. Federal and State Grants, including Augmentation category in FY11-FY15, contributed an additional 24%. Together these two categories were 92% of revenues during FY11-FY24. Act 56 of 2020, extended through July 2035 by Act 129 of 2024, authorized the PFBC to set certain fees by rulemaking.

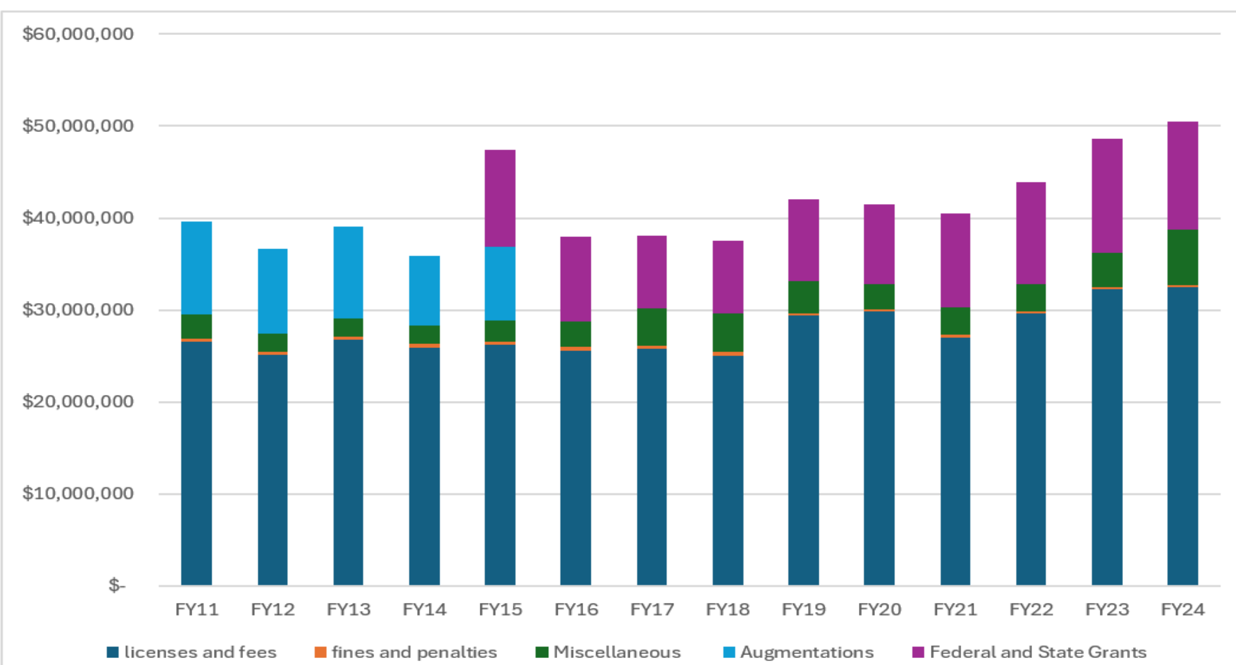


Figure 12. PFBC Fish Fund revenue by category, FY11-FY24.

The trend in PFBC Fish Fund fishing license and fee revenue was a positive 2.1% during this time (Figure 13). Fishing license fee increases implemented in FY23 increased revenue by approximately $3 million (Laurel Anders, Deputy Executive Director, PFBC. personal communication). The FY24 fishing license fee increase resulted in increased revenue of $2.4 million (Laurel Anders, Deputy Executive Director, PFBC. personal communication).

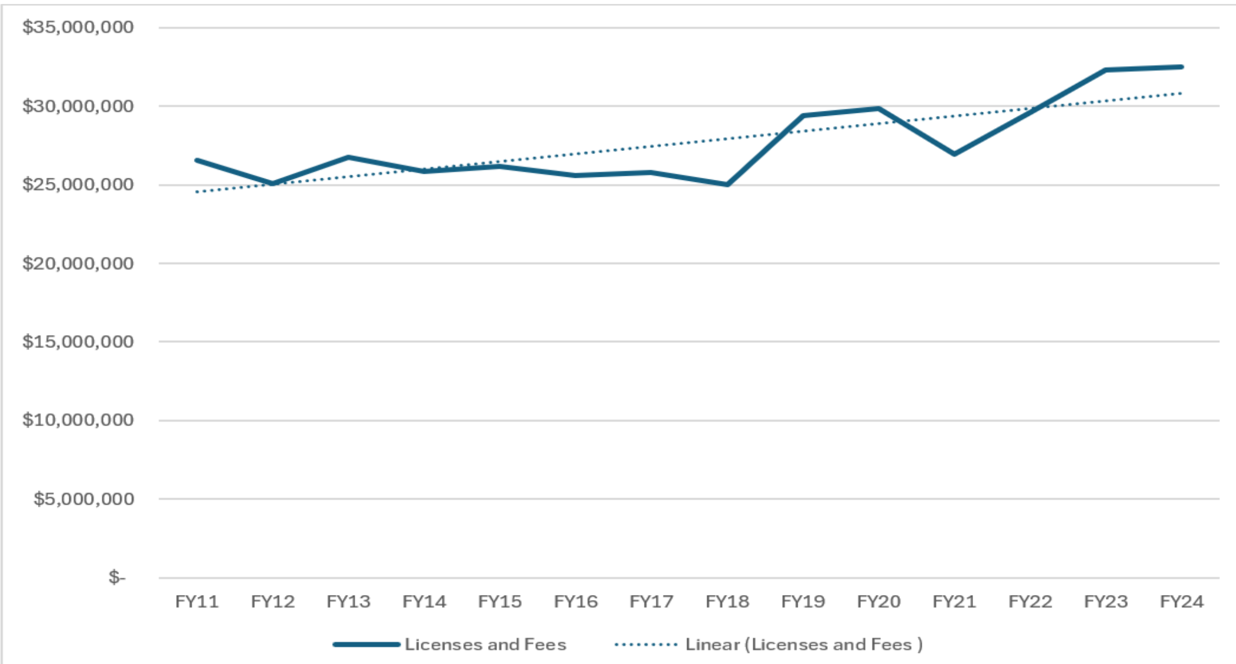


Figure 13. PFBC Fish Fund license and fees revenues, FY11-FY24.

PFBC reported 1,060,523 paid license holders purchasing 1,429,134 fishing licenses and permits in FY23, ranking 9th nationally (Table 3). Trends in total fishing license sales were gradually increasing during the 2009-2025 period (Figure 14). The Covid outbreak resulted in a significant increase in fishing license sales during 2020-2021. A closer examination indicates fishing license sales increased from 2009-2015, followed by a decrease from 2016-2019, a spike upward during Covid, and most recently a decline in fishing license sales from 2021-2025 (Figure 14 and Figure 15). Over the period of 2009-2025, the trend in fishing license sales was a positive 0.5% per year.

Table 3. Fishing license holders and license sales by state for apportionment year 2025 (2023 license year).								
State	Size (sq. miles)	2023 Population	2023 Paid Fishing License Holders	2023 Paid Fishing License Holder Rank	2023 Resident Fishing Licenses, Tags, Permits and Stamps Sold	2023 Nonresident Fishing Licenses, Tags, Permits and Stamps Sold	2023 Ratio of Anglers to State Population	2023 Density of Anglers per Sq. Mile
Michigan	56,539	10,140,459	1,090,840	3	888,204	237,683	0.11	19.3
Ohio	40,953	11,883,304	826,619	13	560,124	117,948	0.07	20.2
Pennsylvania	44,820	13,078,751	1,060,523	9	1,292,790	136,344	0.08	23.7
Minnesota	79,617	5,793,151	1,326,301	5	1,143,571	342,765	0.23	16.7
Wisconsin	54,314	5,960,975	1,295,764	6	1,268,497	413,937	0.22	23.9
New York	47,224	19,867,248	857,244	12	960,572	217,321	0.04	18.2
Texas	261,914	31,290,831	1,925,251	1	2,164,568	163,124	0.06	7.4
Georgia is ranked 7th, Tennessee is ranked 10th, and Colorado is ranked 11th in paid fishing license holders.								
State area and publicly owned data: Natural Resources Council of Maine (1991).								
Hunting and fishing license data: U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Program (2026).								
Apportionment year is TWO YEARS AFTER states issued licenses, so costs and number of license holders for 2025 represent license sales that occurred in 2023.								
State population data: U.S. Census Bureau (2025).								
Ratio of anglers to state population includes nonresident fishing license holders, so value is not a percent of state's population who fishes.								
Some anglers may hold a fishing license in more than one state.								

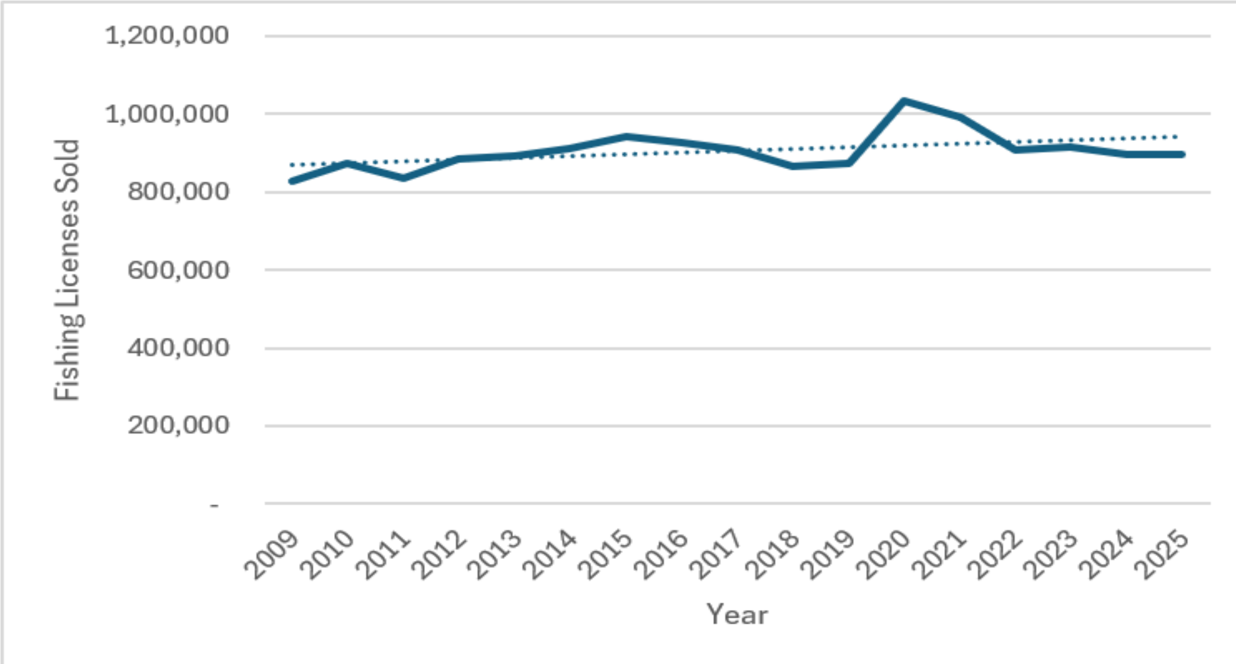
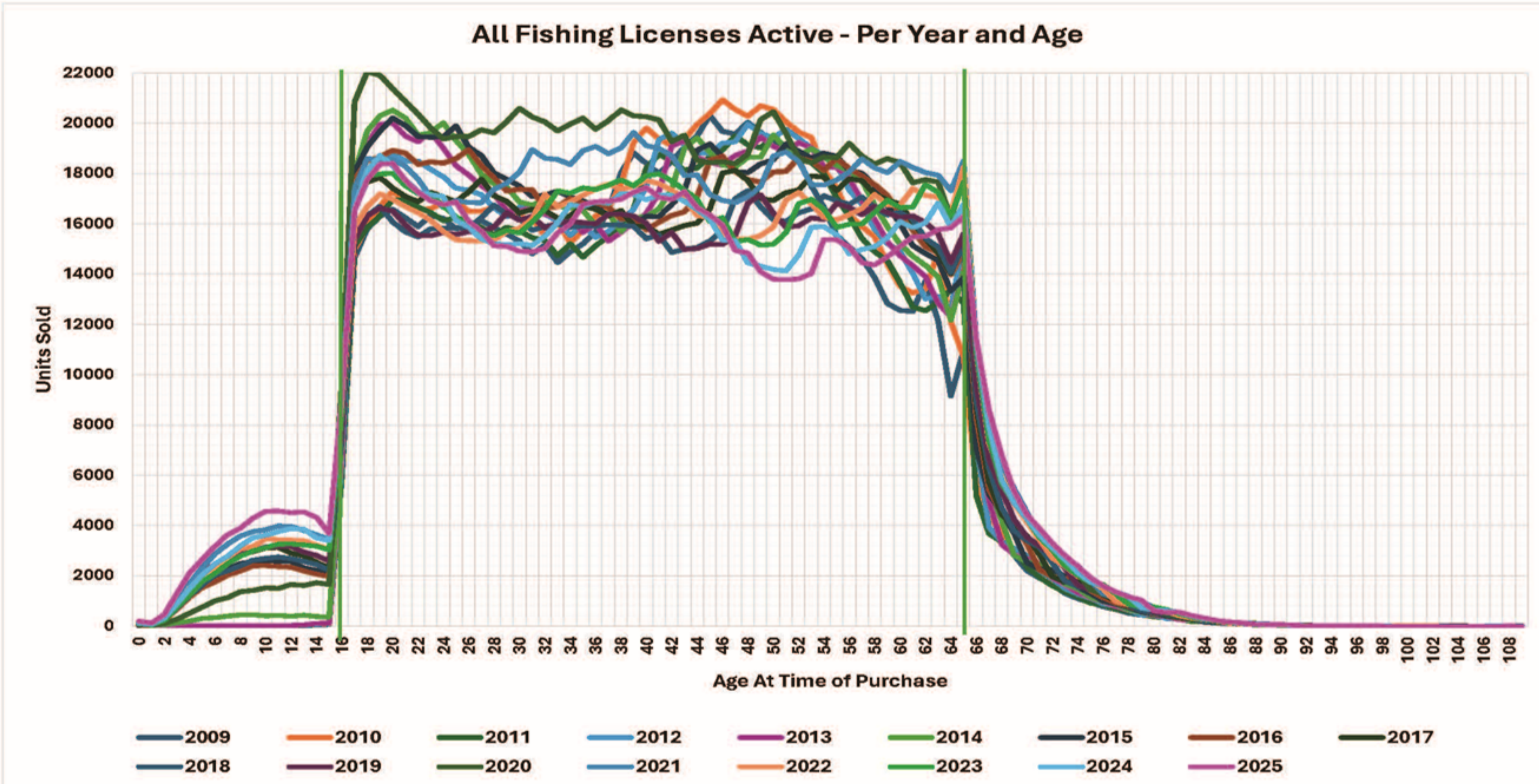


Figure 14. PFBC paid fishing licenses sold (data from Figure 15). Trend line indicated by dotted line.



*Mentored Youth Permit and License are included. Based on data migrated to HuntFishPA. Numbers may vary from prior versions.

Parameter	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Total Licenses Sold	829138	872740	836334	884551	890573	910229	940121	925443	905590	864225	873011	1033681	992479	908820	915051	894191	896414
Diff vs Previous Year		43602	-36406	48217	6022	19656	29892	-14678	-19853	-41365	8786	160670	-41202	-83659	6231	-20860	2223
Diff vs 2009		43602	7196	55413	61435	81091	110983	96305	76452	35087	43873	204543	163341	79682	85913	65053	67276

Figure 15. PFBC fishing license sales by year and age. Image provided by PFBC.

PFBC offers two types of Senior fishing licenses: a $12.50 Senior Resident Annual Fishing License (created 1964) and an $85 Senior Resident Lifetime Fishing License (created 1979). Fishing license purchases decline significantly beginning at age 65 (Figure 15). These license sales to 65-year-old (and older) buyers primarily represent the purchase of Senior Lifetime Licenses, which are valid for multiple years.

An estimated 19.8% of active registered anglers in 2023 were Senior Lifetime Fishing License holders, which are certified as a license sold for 18 years for USFWS federal aid purposes (Laurel Anders, Deputy Executive Director, PFBC. personal communication). The contribution of Senior Lifetime Fishing Licenses to natural resource conservation is $4.70/year in state revenue and approximately $4-$5 in federal aid contribution (based on a federally determined assessment that the useful life of a Senior License is 18 years (Laurel Anders, Deputy Executive Director, PFBC. personal communication).

WMI estimates that continuing the Senior Resident Lifetime Fishing License foregoes on the order of $1.6 million to $6.1 million in state license revenue annually. Because the $85 lifetime license is federally certified over an 18-year useful life, it returns approximately $4.70 per year in state revenue, compared with $12.50 for a Senior Resident Annual License and $27.97 for the current standard resident annual license. Applying the estimated 19.8% Senior Lifetime share of active registered anglers to PFBC's FY23 base of 1,060,523 paid license holders implies approximately 210,000 to 260,000 Senior Lifetime holders. The lower end of the range assumes these anglers would otherwise purchase a Senior Annual license each year; the upper end assumes they would purchase a standard resident annual license. Both ends are upper-bound estimates in that they assume every such angler would continue to buy a license each year; because some would reduce or discontinue participation, the realized loss would be lower. The estimate reflects state license revenue only. Federal aid is captured during the 18-year certification period (approximately $4 to $5 per license per year); however, continued reliance on near-free lifetime licenses poses a potential erosion of the Commonwealth's federal Sport Fish Restoration (Dingell-Johnson) apportionment, which is based substantially on the number of certified paid license holders. Anglers who continue to fish beyond the 18-year certification are no longer counted in that base, reducing Pennsylvania's share of national funds over time as the senior angler cohort grows.

Federal and state grants (including Augmentation category during FY11-FY15) averaged $9.9 million annually and represented 23.6% of Fish Fund revenues over the FY11-FY24 period (Figure 166). FY23 and FY24 were the highest years on record for federal and state grant revenues in the Fish Fund. Over the time of 2011-2024, the trend in federal and state grant revenues was a positive 2.0% per year. For Federal Fiscal Year 2024, the U.S. Fish and Wildlife Service (USFWS) apportioned $381,827,198 in grants under the Sport Fish Restoration Act for state sport fish programs. PFBC received $9,320,492 or 2.4% of the total national grants.

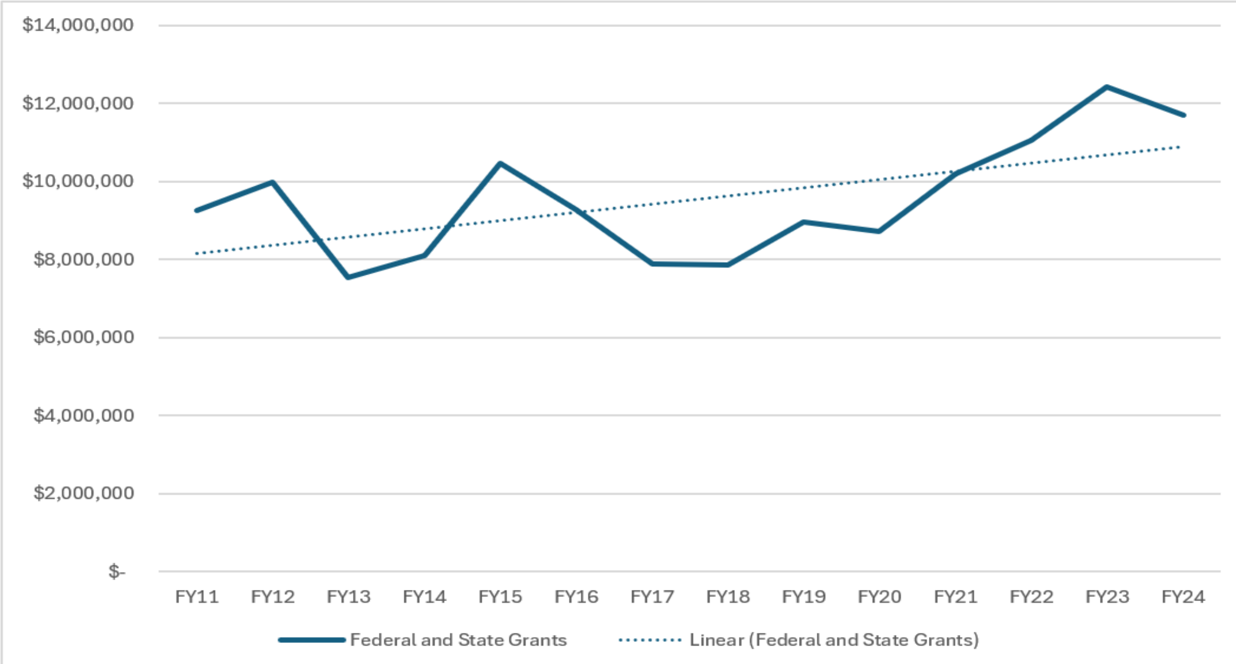


Figure 16. PFBC Fish Fund federal and state grant revenues (including augmentation category during FY11-FY15), FY11-FY24.

Total Boat Fund revenue averaged $18.3 million, ranging from $13.3 million in FY12 to $24.9 million in FY23 (Figure 17). Forty-six percent of the revenue during this period came from licenses (including boat registrations), permits and fees. Federal and state grants (including augmentations, federal funds, liquid fuel tax, and Federal and State grants categories) contributed an additional 24% of total revenue. These two fund categories account for 70% of total revenues. The trend in PFBC Boat Fund revenue was a positive 6.8% per year. In addition, recent changes in the allowable use of Oil Company Franchise Tax (OCFT) revenue will positively affect availability of these funds for Boat Fund general obligations (Timothy D. Schaeffer, Executive Director, PFBC. personal communication). OCFT revenues are included in the miscellaneous category in annual reports.

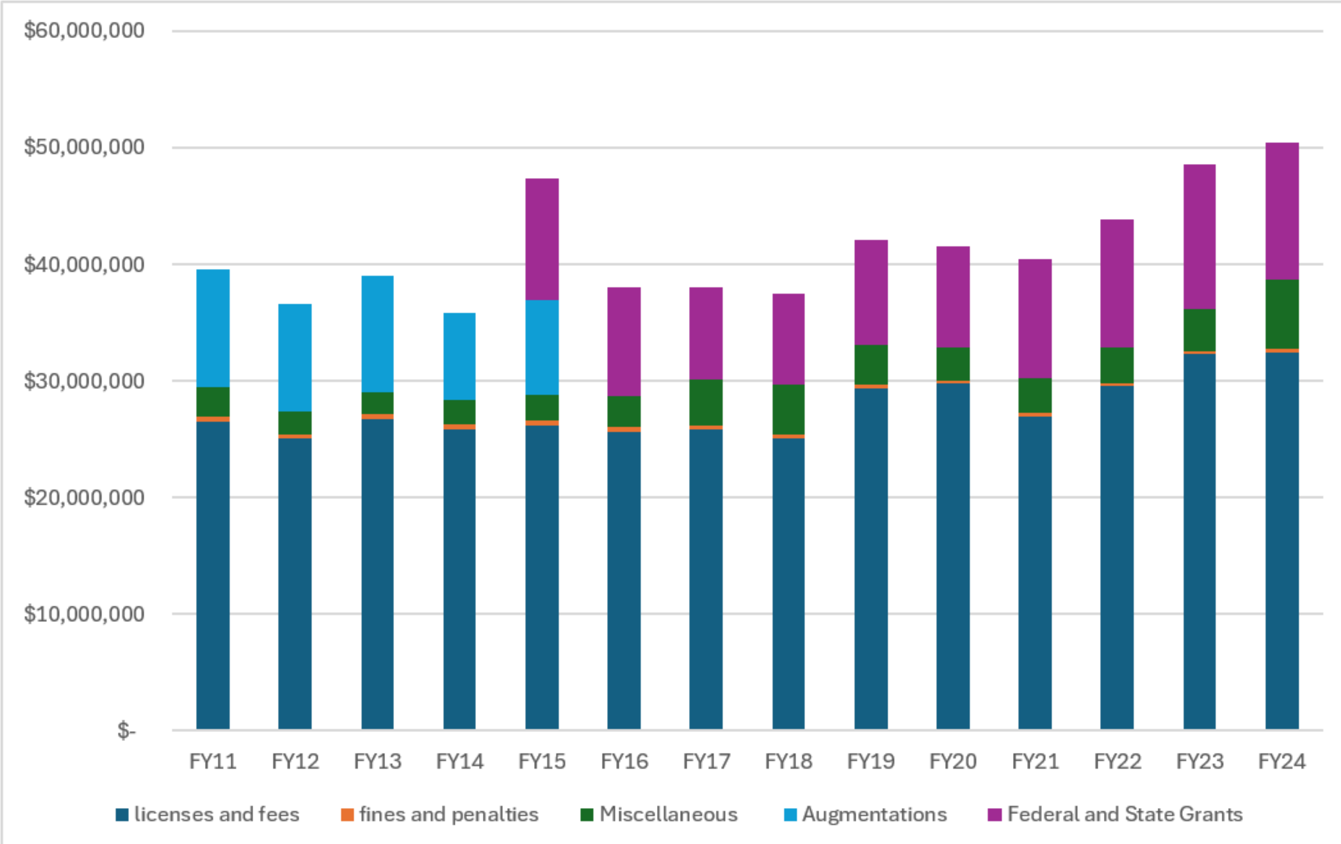


Figure 17. PFBC Boat Fund total revenue by category, FY11-FY24.

The data source (PFBC annual reports) changed category designations during the time, resulting in some categories occurring in some but not all years. The annual reports did not indicate how categories were reclassified. WMI combined the categories of Augmentations, Liquid Fuels Tax, Federal, and Federal and State Grants into one category of Federal and State Grants.

PFBC Boat Fund license and fee revenue, including boat registrations, increased during FY10-FY24 (Figure 18). The trend was a positive 3.3% per year. PA boat registrations declined during 2016-2024 (Figure 19). The overall trend in the number of boat registrations during 2016-2024 was a negative 1.3% per year. Nationally recreational vessel registrations also declined during 2016-2024 (U.S. Coast Guard, 2025), although the trend was a negative 0.3% per year (Figure 20).

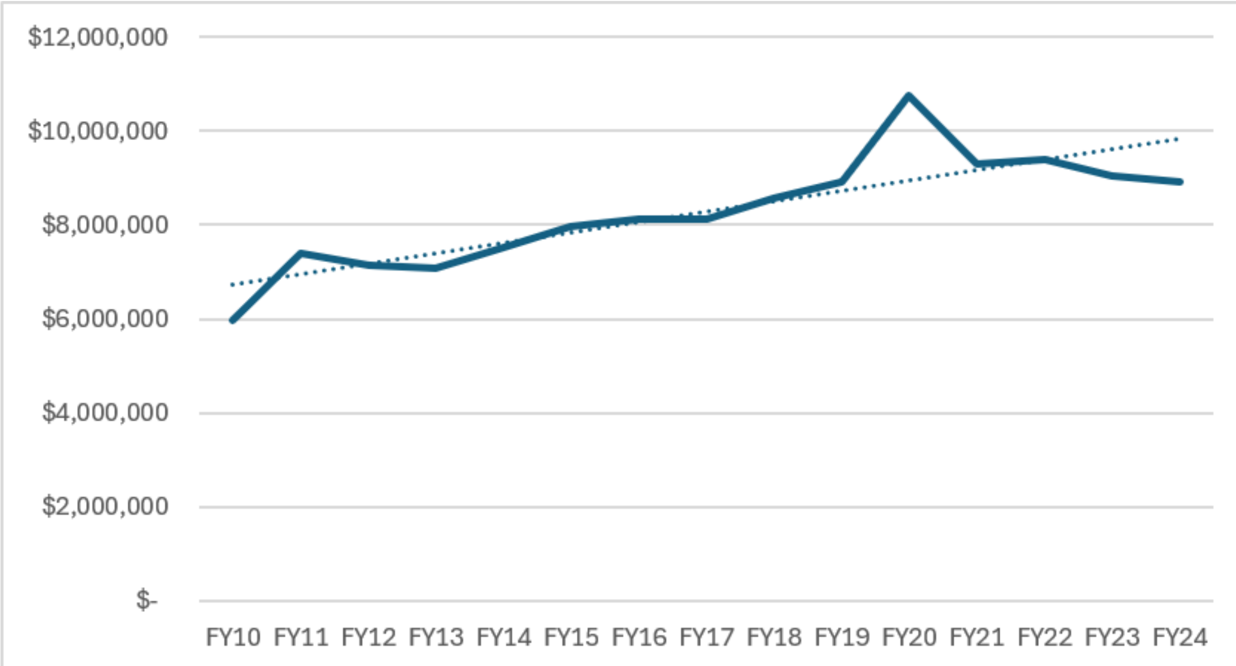


Figure 18. PFBC Boat Fund license and fee revenues, including boat registrations (FY10-FY24). Trend indicated by dotted line.

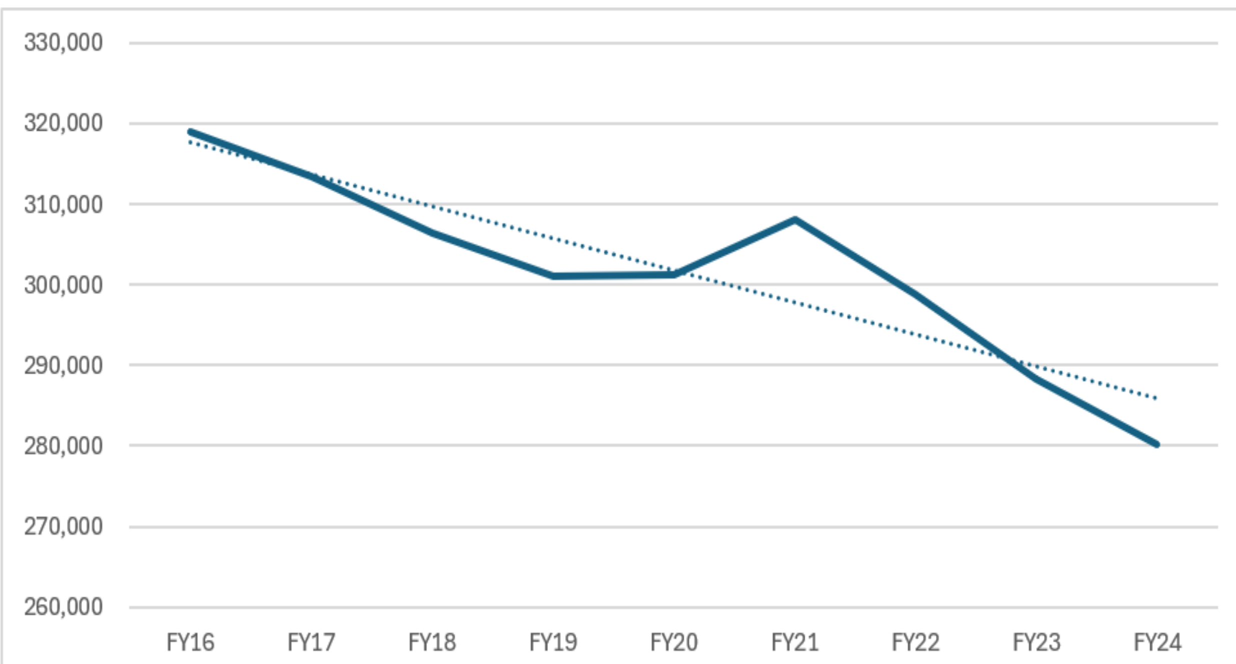


Figure 19. PA boat registrations by year, FY16-FY24. PA boat registration data begin in FY16 and does not include earlier years included in most other PFBC revenue figures.

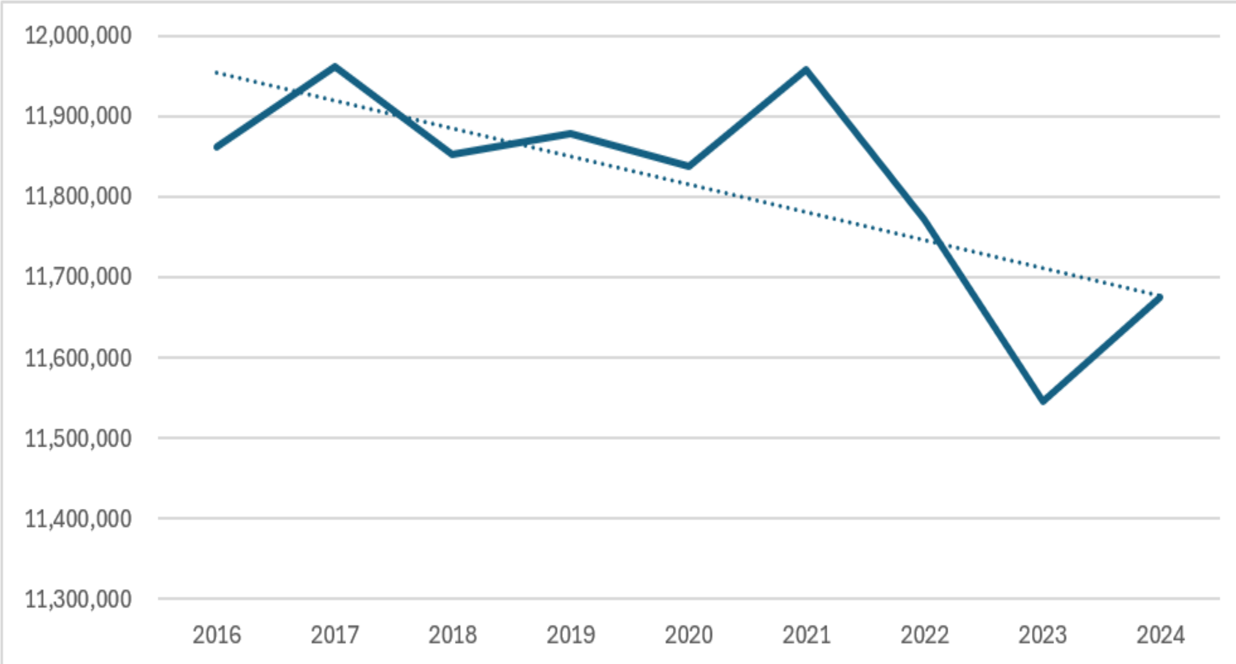


Figure 20. Recreational vessels registered by year in the United States, 2016-2024. Data from U.S. Coast Guard, 2025. Accessed July 2026.

Federal and state grant revenue in the Boat Fund ranged from a low of $3.4 million in FY15 to a high of $4.4 million in FY13 during FY10-FY24 (Figure 21). WMI combined the augmentation, federal, liquid fuels tax and state and federal grants to create a single category for state and federal grants revenue. The trend line was a negative 0.3% per year during the FY10-FY24 period.

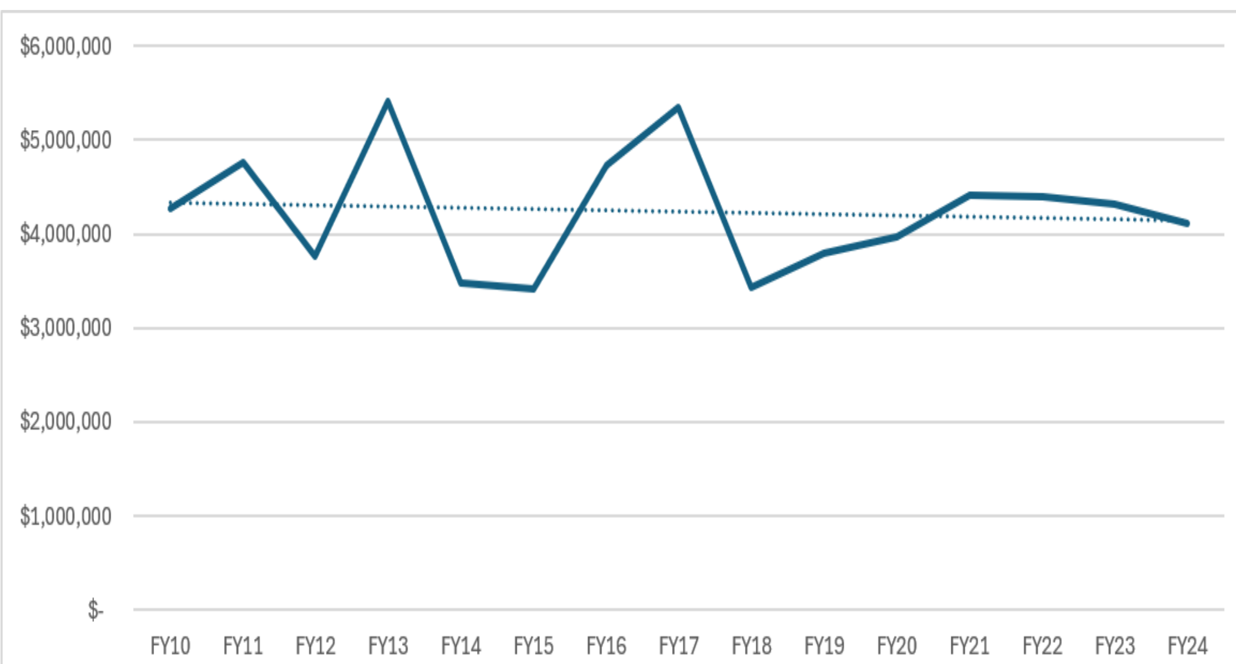


Figure 21. PFBC Boat Fund federal and state grant revenues, FY10-FY24.

We reviewed PFBC total expenditures for FY10 through FY24 using annual reports (Pennsylvania Fish and Boat Commission, 2011-2024). For the purposes of this report, we combined Fish Fund and Boat Fund expenditures because recent changes in legislation allowed for greater flexibility of Boat Fund expenditures (Figure 22). The lowest year of expenditures occurred in FY10 ($49,537,369) while the highest occurred in FY24 ($77,078,295). PFBC expenditures increased an average of 4.0% per year during FY10-FY24.

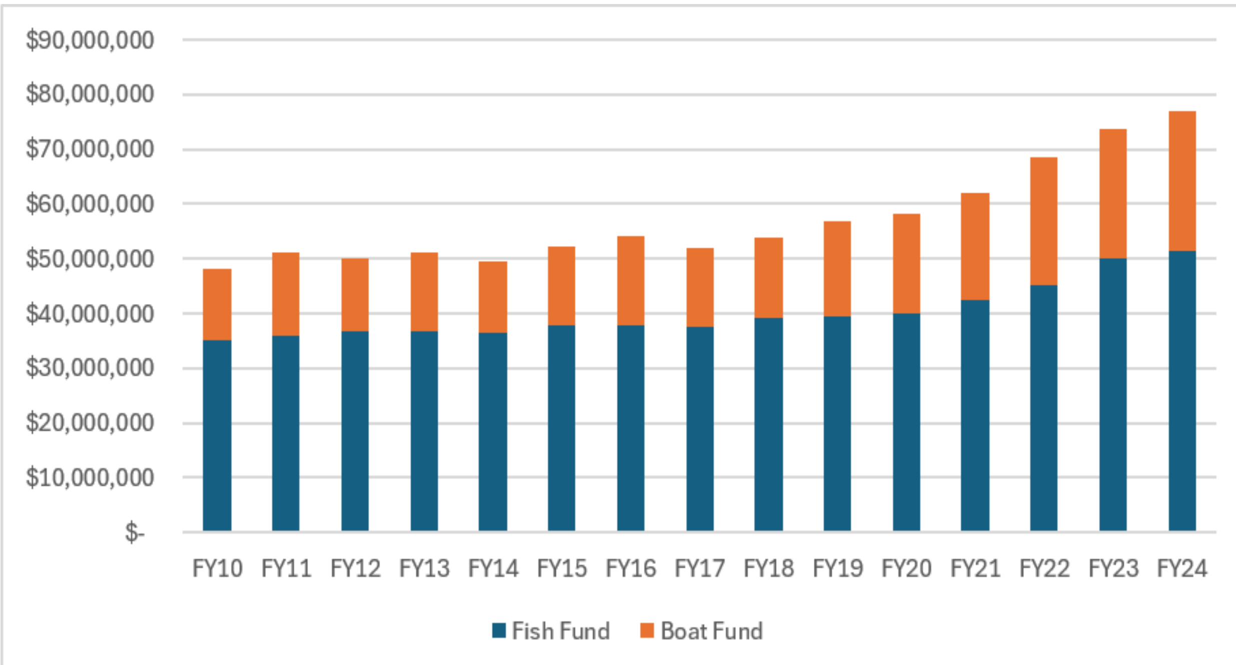


Figure 22. PFBC total expenditures by fund, FY10-FY24.

PFBC personnel expenditures steadily increased during FY10-FY24 (Figure 23). The number of filled positions has varied no more than 10 positions (2.7%) since 2015 (Table 4).

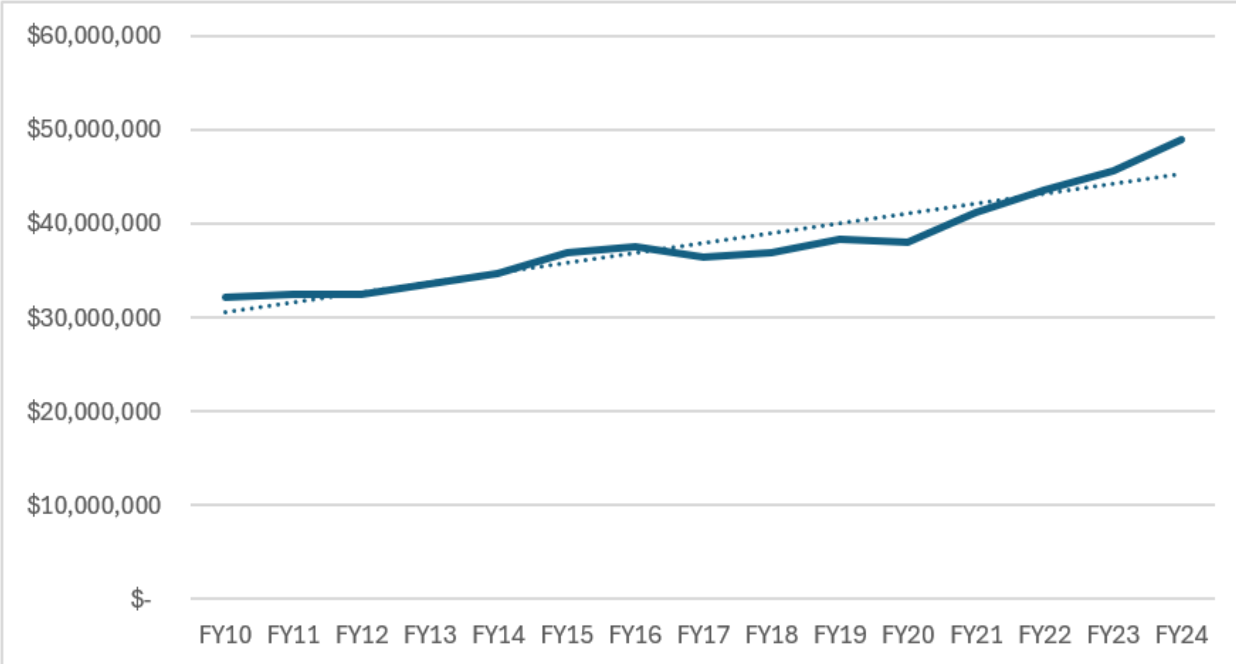


Figure 23. PFBC personnel expenditures (Fish Fund and Boat Fund combined), FY10-FY24.

Table 4. PFBC staffing complement by organizational unit.

PFBC Organizational Unit [1]	2018 Total	2018 Filled	2021 Total	2021 Filled	2025 Total	2025 Filled
Executive Office	**11**	**9**	**8**	**8**	**2**	**2**
Office of Chief Counsel					7	7
Policy, Planning, and Communications Office					4	4
Office of Field Operations	**1**	**1**	**1**	**0**	**2**	**2**
Bureau of Fisheries	53	51	58	53	66	58
Bureau of Engineering	47	42	47	39	51	46
Bureau of Hatcheries	113	110	110	106	105	102
Bureau of Law Enforcement	**93**	**89**	**110**	**97**	**108**	**84**
Office of Administration	**6**	**6**	**10**	**10**	**2**	**1**
Bureau of Administration	29	28	29	27	32	29
Bureau of Outreach, Education and Marketing			18	13	15	13
Bureau of Boating	17	15	7	6	7	7
Bureau of Information Technology	11	10	12	11	13	12
Human Resource Office					6	4
Total	**381**	**361**	**410**	**370**	**421**	**371**

[1] Difference between total and filled are vacancies.

Source: Legislative Budget and Finance Committee Performance Audits.

PFBC had a total complement of 432 positions in 2015, with 364 positions filled.

Non-personnel expenditures (budget categories of operating, fixed assets, grants, and payments to state agencies combined) were 34% of total expenditures on average (Figure 24), ranging from 29% (FY15) to 38% (FY23). Non-personnel expenditures increased an average of 5.6% per year during FY10-FY24 (Figure 24), ranging from a low of $14.9 million in FY14 to a high of $28.2 million in both FY23 and FY24.

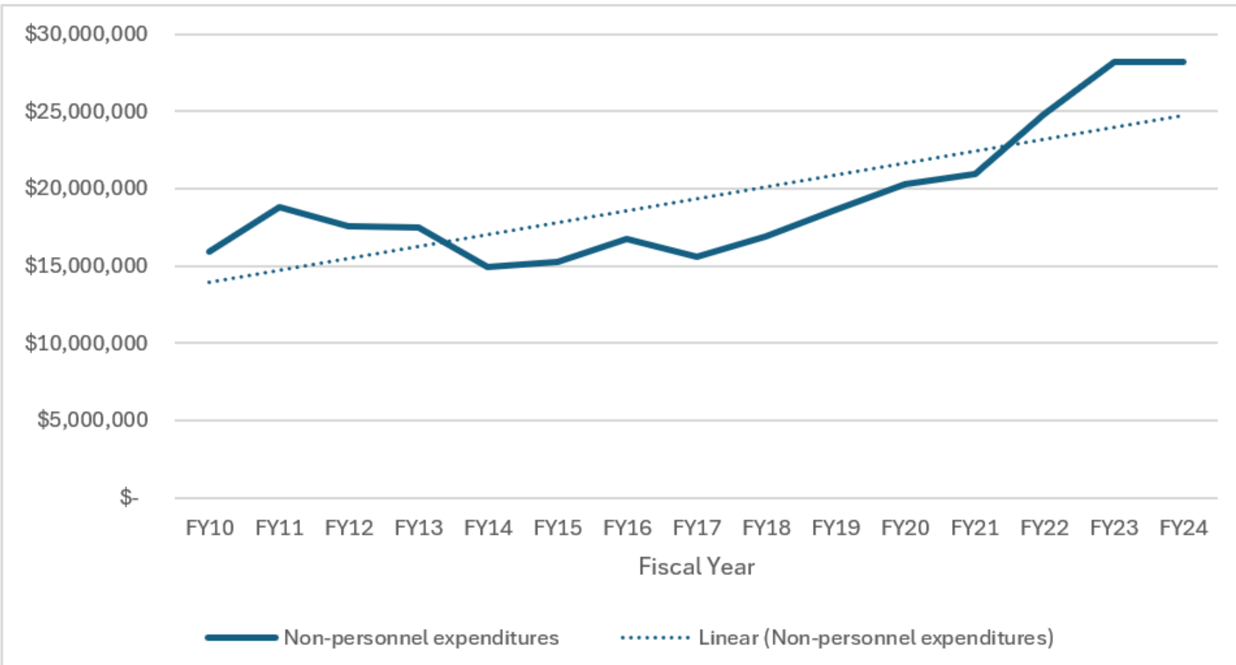


Figure 24. PFBC non-personnel expenditures (budget categories of operating, fixed assets, grants, and payments to state agencies combined) for combined Fish Fund and Boat Fund, FY10-FY24.

PFBC total expenditures closely tracked PFBC total revenues during the period of FY10-FY24 (Figure 25). Expenditures exceeded revenues in FY24. PFBC total ending year fund balances (Fish Fund and Boat Fund combined) also generally increased during FY15-24 (Figure 26), although the total ending fund balance was reduced in FY24. In FY24, the PFBC combined fund ending balances were approximately 1.9 times combined fund expenditures in that year.

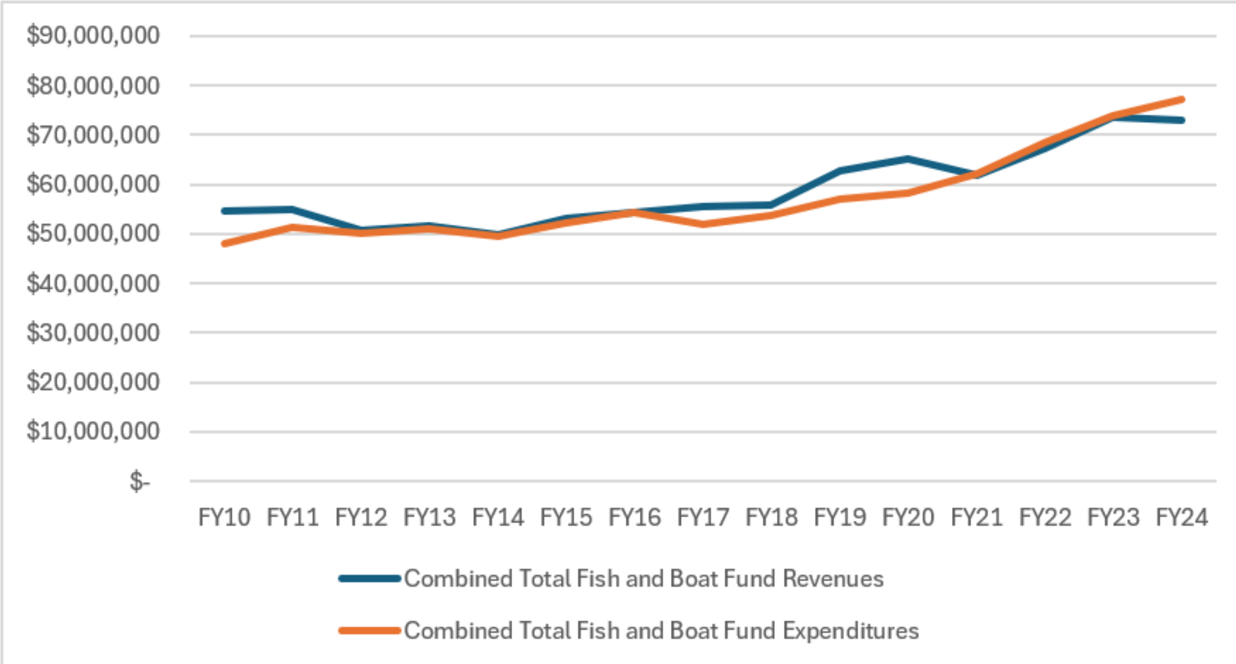


Figure 25. PFBC total revenues and expenditures (combination of Fish Fund and Boat Fund), FY10-FY24.

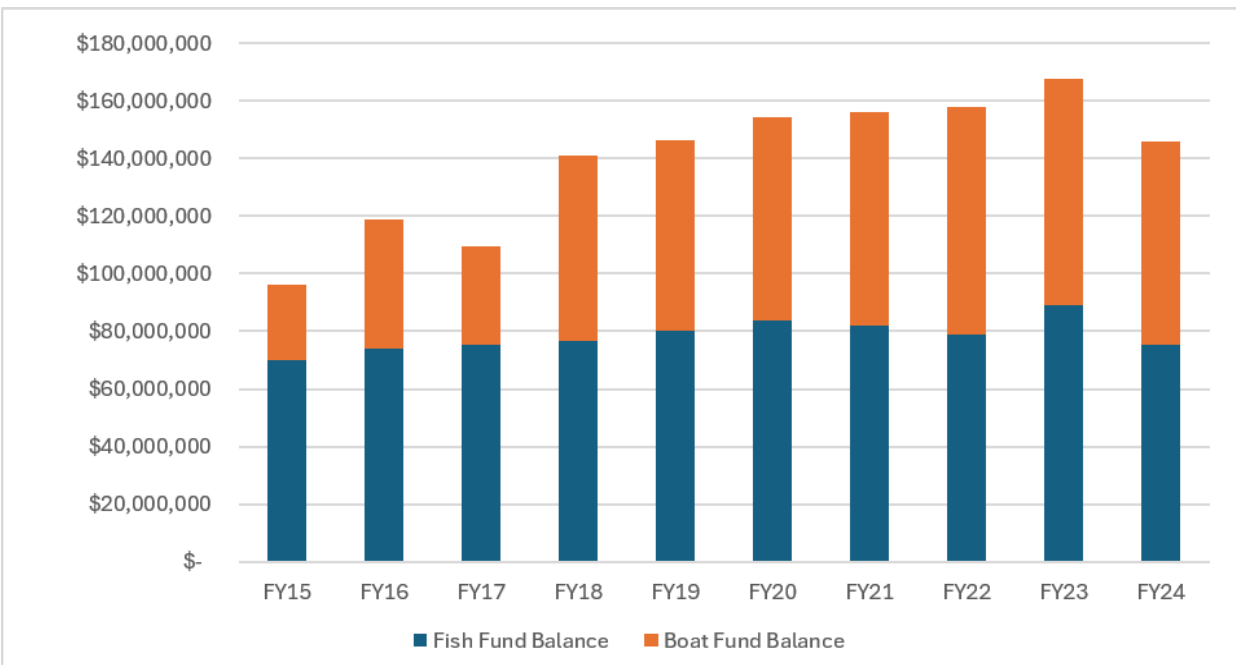


Figure 26. PFBC total fund ending balance (combined Fish Fund and Boat Fund), FY15-FY24.

Projection of PGC and PFBC revenue and expense 2025-2034.

A necessary step in finding efficiencies in management is the incorporation of projections of revenue and expense, trends in outdoor recreation, and natural resource quantity and quality. PGC and PFBC have historically relied on license and permit fees (for hunting, fishing, and boating), sale of natural resources, and federal aid reimbursements as the primary sources of revenue. Factors affecting the expenditures of the commissions include revenue income (an interaction of license cost and participation rates), inflation in the cost of goods and services, employee compensation, adoption of new technologies, and mission.

Throughout these projections, WMI will refer to inflation as an important consideration. The consensus U.S. inflation model projects U.S. inflation to average 2.4% per year (year-over-year change) for the next 10 years (Econforecasting.com, 2026). However, the Consumer Price Index (Official Data Foundation / Alioth, LLC, 2026) also provides yearly estimates of inflation. The average CPI estimate for inflation during 2016-2025 was 2.9% per year. This period includes the Covid outbreak and the Eurasian conflict in Ukraine. The media reviewed suggests a higher degree of uncertainty in future forecasts because of current worldwide events and the uncertainty associated with the magnitude and duration of these events. WMI selected the average US CPI value (2.9%) from 2016-2025 as our inflation forecast in our projections that used an inflation estimate.

Projection of PGC revenue and expenditures FY25-FY34.

Estimation of PGC hunting license and permit fee revenue, FY25-FY34.

Revenues from hunting license and permit fees ranged from $35.2 million in FY14 to a high of $41.1 million in FY24, averaging $37.9 million (Figure 3).

A second trend apparent in PGC hunting license sales is lower license sales to young hunters (ages 21-37 years old) compared to the number of older hunters (49-65 years old), who are aging out of annual license buying (Figure 4). The exodus of older hunters at age 65 could accelerate the rate of decline in license revenues, although the age discrepancy in recruitment/retirement has been going on for some time and is incorporated into current declining figures.

National level data (U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Program (2026)) from the 2009-2023 period indicates a slight increasing trend and little sign of a sustained Covid bump. License sales were down overall in three of the four geographical regions (Northeast, Southeast, and Western), with percentages ranging from -2.1% to -0.6%, while the Midwest region experienced a slight increase of 1.0% (Council to Advance Hunting and Shooting Sports, n.d.). The percentage of U.S. citizens over the age of 6 who purchased a hunting license was 4.6%, a significant decline from a peak of 7.7% in 1960 (VanDerLaan, 2024).

Based on both state and national data on base hunting license purchases, we would project hunting license purchasers to decline by 0.8% per year for the next 10 years from the 2024 base hunting license sales of 841,091 licenses (Figure 4). Assuming there was no change in license fees, revenue from hunting license sales would decline at the same rate of 0.8%. The FY24 hunting license and permit fee revenues of $41,100,537 (Figure 3) was the starting point for calculations.

Estimation of PGC Federal Aid reimbursement revenues, FY25-FY34

Projections of revenue from federal sources (PR, SWG, etc.) are not provided by the federal managers of these funds. On average, federal revenues increased 7.0% per year during FY13-FY25 (Figure 5). Future revenues will be influenced by the effects of inflation on firearm and related equipment prices and future demand. Assuming there is no change in demand for firearms and eligible equipment, we would project revenues from federal aid reimbursement sources to increase 2.9% per year due to inflation on firearms and related eligible equipment during FY25-FY34. The PGC FY24 federal aid reimbursement revenue of $30,994,864 (Figure 5) was the starting point for calculations.

Estimation of PGC NRRW revenues, FY25-FY34.

Available PGC information indicates volatility in the revenues that have been earned from NRRW. Revenues are influenced by the amount of gas and oil development on PGC lands, worldwide oil prices, inflationary pressures, technology, and likely other factors. While projections exist for the future of the Marcellus shale gas play (Saputra et al., 2024), we find difficulty in estimating future revenues from gas and oil activity on PGC lands. We project future revenues from NRRW to increase 2.9% per year due to inflation during FY25-34. The FY24 NRRW revenues of $100,492,265 was the starting point for calculations.

Estimation of other PGC revenues, FY25-FY34.

WMI projected future revenues from other PGC sources (categories of game law fines, miscellaneous, interest income, sale of timber, and game news subscriptions) to increase 2.9% per year due to inflation during FY25-34. We considered that this rate could be flat (0.0%) during the next 10 years, although interest income is a significant source of revenue in this category because of increasing NRRW revenues that affect PGC ending fund balances. We projected NRRW revenues to increase at the rate of inflation, thus the interest earned should also increase at this rate (2.9%), assuming the interest rate remains constant. The FY24 revenue from these other sources of $66,603,073 (27.8% of total PGC revenues) was the starting point for calculations.

Estimation of PGC Personnel expenditures, FY25-FY34.

Personnel expenditures were previously reported for FY13-FY22 (Figure 7). On average, personnel costs were 58% of total PGC expenditures. The trend in personnel expenditure was a positive 4.2% annually. We estimated the FY24 personnel expenditures as 58% of total FY24 PGC expenditures (0.58 * $260.8 million = $151,264,000) to determine the starting point for calculations of future personnel expenditures. PGC personnel expenses reflect an increase of approximately 5% from year to year under the current salary, wage and benefit contracts (Steven Smith, Executive Director, PGC. Personal communication):

- AFSCME (Council 13, American Federation of State, County and Municipal Employees) – July 1, 2023 to June 30, 2027
- FOP (Fraternal Order of Police, Conservation Police Officers Lodge 114) – July 1, 2024 to June 30, 2028

Estimation of PGC non-personnel expenditures, FY25-FY34.

We projected non-personnel expenditures to increase 2.9% per year due to inflation during FY25-34. WMI estimated FY24 non-personnel expenditures by subtracting estimated personnel expenditures (see Estimation of PGC Personnel expenditures FY25-FY34) from total expenditures ($260,800,000 - $151,264,000 = $109,536,000) as a starting point for future non-personnel expenditures.

Model of PGC projected revenues and expenditures, FY25-FY34

WMI's model indicates that PGC future revenues from FY25-FY34 will increase 2.5% annually from PGC total FY24 revenues (Table 5 and Figure 27). WMI's model indicates that expenditures will increase 4.0% annually from PGC FY24 expenditures. PGC NRRW projected revenues are based on inflation rates but could easily be greater. The projected PGC non-personnel expenditures are conservative in that the historical trend (28.8% annually) is greater than the estimated rate of inflation that was used in the model. PGC expenditures over the 10-year period will exceed PGC revenues by $476.8 million. For comparison, the FY24 PGC Game Fund ending balance was $504.3 million. Projections indicate that both PGC Game Fund ending balance and interest earnings from those balances will be significantly reduced by FY34. A funding strategy that uses only efficiency improvements will have to consider adjustments to achieve a more sustainable balance of revenues and expenditures.

Table 5. PGC future revenue and expenditures, FY25-FY34. Negative numbers are in red or are in parentheses.

		FY13-FY24												
Category		historical	estimated											
		trend	trend	starting point										
Revenues		amount	amount	FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31	FY32	FY33	FY 34
	License and Fees	1.7%	-0.80%	$ 41,100,537	$ 40,771,733	$ 40,445,559	$ 40,121,994	$ 39,801,018	$ 39,482,610	$ 39,166,749	$ 38,853,415	$ 38,542,588	$ 38,234,247	$ 37,928,37
	Federal aid	7.0%	2.90%	$ 30,994,864	$ 31,893,715	$ 32,818,633	$ 33,770,373	$ 34,749,714	$ 35,757,456	$ 36,794,422	$ 37,861,460	$ 38,959,442	$ 40,089,266	$ 41,251,85
	NRRW	208.0%	2.90%	$ 100,492,265	$ 103,406,541	$ 106,405,330	$109,491,085	$112,666,326	$115,933,650	$119,295,726	$ 122,755,302	$126,315,206	$129,978,346	$133,747,71
	Other	66.0%	2.90%	$ 66,603,073	$ 68,534,562	$ 70,522,064	$ 72,567,204	$ 74,671,653	$ 76,837,131	$ 79,065,408	$ 81,358,305	$ 83,717,696	$ 86,145,509	$ 88,643,72
expenditures														
	Personnel	4.2%	4.20%	$ 151,264,000	$ 157,617,088	$ 164,237,006	$171,134,960	$178,322,628	$185,812,179	$193,616,290	$ 201,748,174	$210,221,598	$219,050,905	$228,251,04
	Non-personnel	28.8%	2.90%	$ 109,536,000	$ 112,712,544	$ 115,981,208	$119,344,663	$122,805,658	$126,367,022	$130,031,666	$ 133,802,584	$137,682,859	$141,675,662	$145,784,25
Summary				FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31	FY32	FY33	FY 34
			Total Revenue (	$ 239,190,739	$ 244,606,551	$ 250,191,586	$255,950,657	$261,888,712	$268,010,847	$274,322,305	$ 280,828,482	$287,534,932	$294,447,369	$301,571,67
			Total Expenditu	$ 260,800,000	$ 270,329,632	$ 280,218,213	$290,479,623	$301,128,286	$312,179,201	$323,647,956	$ 335,550,758	$347,904,457	$360,726,567	$374,035,29
	ratio of revenue to expenditures			$ 0.92	$ 0.90	$ 0.89	$ 0.88	$ 0.87	$ 0.86	$ 0.85	$ 0.84	$ 0.83	$ 0.82	$ 0.8
	difference between revenues and expenditures			$ (21,609,261)	$ (25,723,081)	$ (30,026,627)	$ (34,528,966)	$ (39,239,574)	$ (44,168,354)	$ (49,325,651)	$ (54,722,276)	$ (60,369,525)	$ (66,279,198)	$ (72,463,62

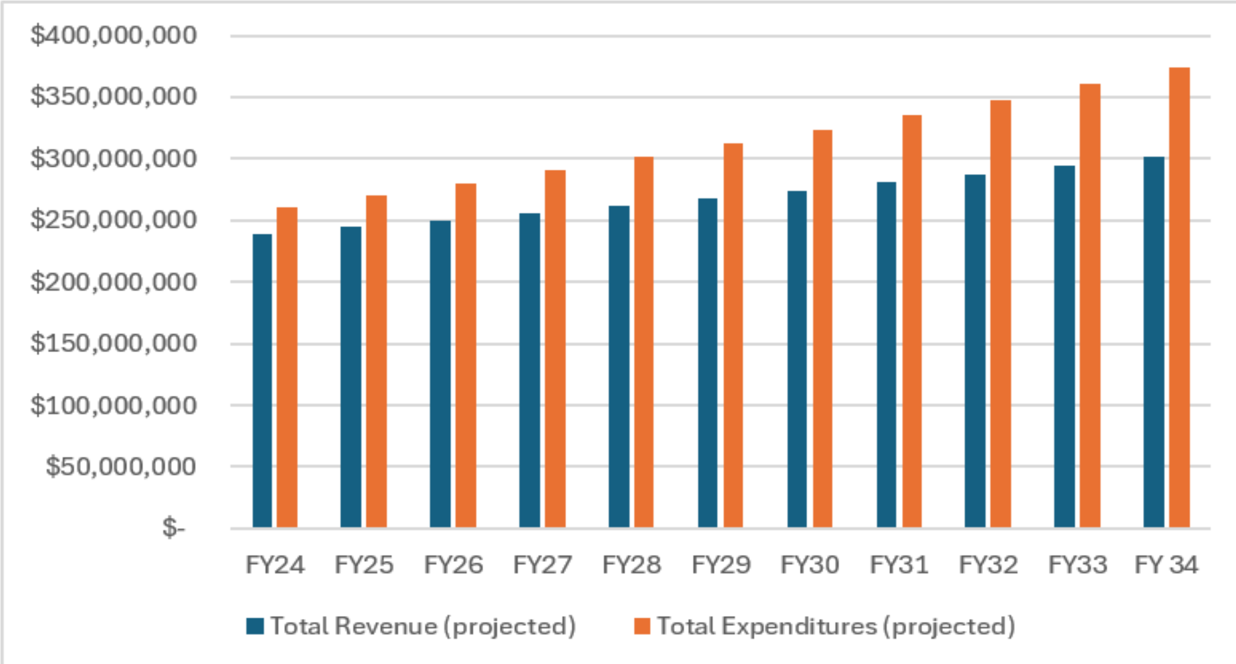


Figure 27. PGC projected revenue and expenditures FY25-FY34.

Projection of PFBC revenues and expenditures, FY25-FY34.

Estimation of PFBC fishing license and fee revenues and expenditures, FY25-FY34.

The trend in PFBC Fish Fund fishing license and fee revenues was a positive 2.1% during FY11-FY24 (Figure 13). Over the period of 2009-2025, the trend in PA fishing license sales was a positive 0.5% per year. The proportion of active registered Senior anglers appears to be increasing (Figure 15) and is likely to continue to increase into the future as 45- to 60-year-old active anglers with regular fishing licenses transition into lifetime license types or quit fishing. The decline in revenue from use of senior licenses will further erode revenues as the costs of doing business increase at the rate of inflation.

National level data (U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Program (2026) from the 2009-2023 period also indicates a gradual increasing trend, a significant Covid bump, and recent declines in fishing license sales.

The 2009-2025 average number of PA fishing licenses sold was 904,270 (Figure 14). If one excludes Covid years (2020-2021) data from calculations, the average number of fishing licenses sold was 889,762. Based on both state and national data, we would project revenue from PA fishing license and fee sales would be stable during FY25-FY34. We chose the stable (0.0%) value rather than the positive 0.5% trend in historical fishing license sale trends because of the influence of Covid during 2020-2021. The FY24 PFBC Fish Fund License and Fees total revenue of $32,474,414 was the starting point for calculations.

Estimation of PFBC Boat Fund Licenses and Fees, FY25-FY34.

PFBC Boat Fund license and fee revenues, including boat registrations, increased during FY10-FY24 (Figure 18). The trend was a positive 3.3% per year. PA boat registrations declined during 2016-2024 (Figure 19). The overall trend in the number of boat registrations during 2016-2024 was a negative 1.3% per year. Nationally boat registrations also declined during 2016-2024 (U.S. Coast Guard, 2025), although the trend was a negative 0.3% per year (Figure 20). If boat registrations and other fees maintain the current fee structure, we would project revenues from PA Boat Fund Licenses and Fees to decline 1.3% per year during FY25-FY34. The FY24 Boat Fund licenses and fees revenues were $8,904,274 and was the starting point for calculations.

Estimation of PFBC Federal and State Grants revenues (combined Fish and Boat Fund totals), FY25-FY34.

PFBC Fish Fund and Boat Fund federal and state grant combined revenues ranged from a low of $11.3 million in FY14 to a high of $16.7 million in FY23. The trend line was a negative 0.9% per year during FY10-FY24. We would project future revenues from the combined Federal and State Grants to decline 0.9% per year. The PFBC FY24 Federal and State Grants combined revenues (Fish Fund and Boat Fund) were $15,823,890 and was the starting point for calculations.

Estimation of PFBC "Other" revenues (Fine and Penalties category and Miscellaneous category for both Fish Fund and Boat Fund), FY25-FY34.

The third largest revenue category for PFBC is the Miscellaneous category. Based on personal communication with L. Anders (Laurel Anders, Deputy Executive Director, PFBC), this category is primarily composed of interest received on securities on deposit (this revenue is accounted for in both the Fish Fund and Boat Fund) and the Oil Company Franchise Tax (OCFT) refund (which is accounted for only in the Boat Fund). Other minor revenue contributors accounted for in this category include: Fish Fund - sand and gravel royalties, Angler & Boater magazine subscriptions, timber sales; and Boat Fund - Water Rescue training and certification fees, slip rentals and other revenue generated at PFBC's Walnut Creek Marina (still in operation) and North East Marina (only until 2024).

PFBC uses four revenue categories in its annual reports. We combined the Miscellaneous category revenues with the 4th source of revenues (Fines and Penalties) to create an "Other" revenues category to be consistent with PGC calculations. The Other revenues category was the remaining 15% of PFBC total revenues during FY11-FY24. Fines and Penalties are less than 1% of total PFBC revenues. PFBC Other revenues ranged from a low of $3.2 million in FY13 to a high of $15.7 million in FY24 (Figure 28). The trend was a positive 16.4%. In regard to what is influencing the trends in this revenue category in Boat Fund, since 2014, the PFBC has used an improved process for more accurately estimating fuel consumption attributed to motorboat use which has had a positive impact on the refund amount. Additionally, Act 89 of 2013 (previously noted/discussed) expanded the range of taxes to be refunded to the PFBC on motorboat fuels to include the OCFT which dramatically increased the refund amount deposited in the Boat Fund. For these reasons, it is important to calculate the historical trend estimate for the Miscellaneous revenue category separately from any other revenue categories (Laurel Anders, Deputy Executive Director, PFBC. personal communication).

WMI could not separate the increasing value due to earnings from the increased value from process improvements. WMI used the inflation rate of 2.9% as the future rate of increase in the Other category due to potential OCFT revenues increasing at an inflationary rate. Interest income could be positive or negative depending on fund ending reserves and realized interest rates. Fines and penalties are projected to remain flat. The PFBC FY24 "Other" revenues were $15,731,195 and was the starting point for calculations.

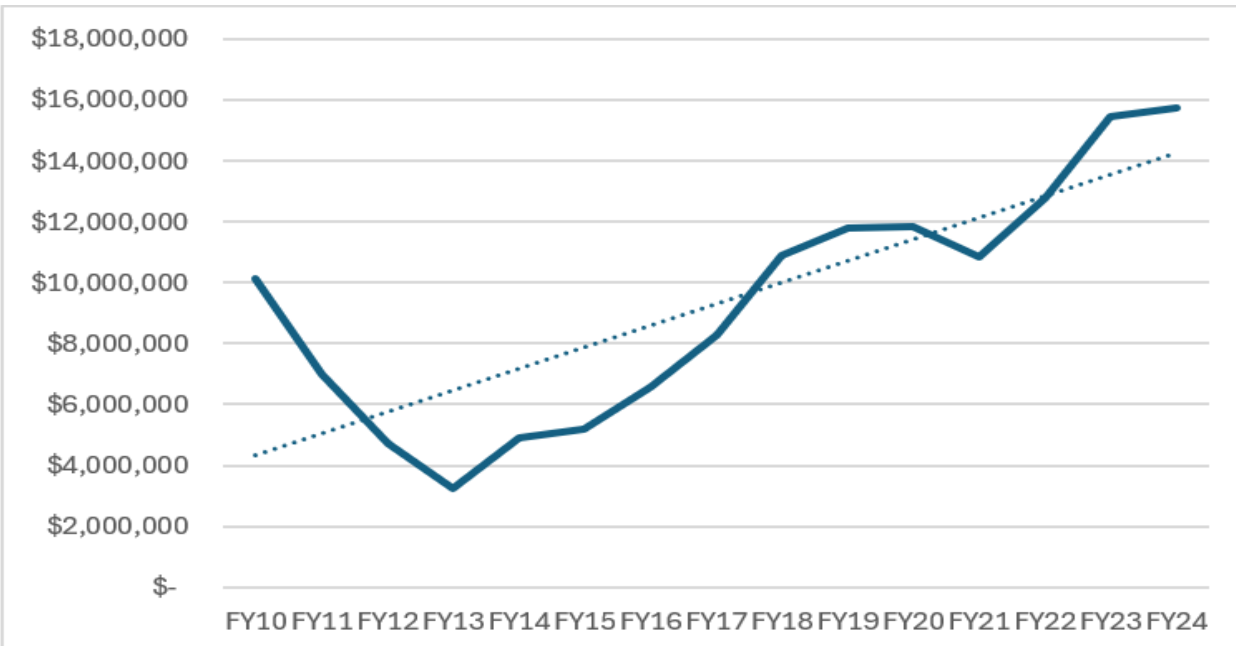


Figure 28. PFBC Other Revenues (combination of Fines and Penalties category and Miscellaneous Category), FY10-FY24.

Estimation of PFBC personnel expenditures, FY25-FY34

Personnel expenditures were previously reported for FY10-FY24 (Figure 23). On average, personnel costs were 66% of total PFBC expenditures. The trend in personnel expenditures was a positive 3.4% annually. PFBC total (Boat and Fish Fund combined) FY24 personnel expenditures were $48,860,649 and were the starting point for calculations of PFBC total personnel expenditures during FY25-FY34. PFBC personnel expenses reflect an increase of approximately 5% from year to year under the current salary, wage and benefit contracts (Timothy D. Schaeffer, Executive Director, PFBC. Personal communication):

- AFSCME (Council 13, American Federation of State, County and Municipal Employees) – July 1, 2023 to June 30, 2027
- FOP (Fraternal Order of Police, Conservation Police Officers Lodge 114) – July 1, 2024 to June 30, 2028

Estimation of PFBC non-personnel expenditures, FY25-FY34

Non-personnel expenditures increased an average of 5.6% per year during FY10-FY24 (Figure 24). We projected PFBC non-personnel expenditures to increase 2.9% per year during FY25-34, based on inflation. PFBC total (Boat and Fish Fund) FY24 non-personnel expenditures were $28,217,646 and served as a starting point for calculations of PFBC total non-personnel expenditures during FY25-FY34.

PFBC revenues and expenditures, FY25-FY34.

WMI's model indicates that future revenues from FY25-FY34 will increase 0.4% per year from PFBC total FY24 revenues (Table 6 and

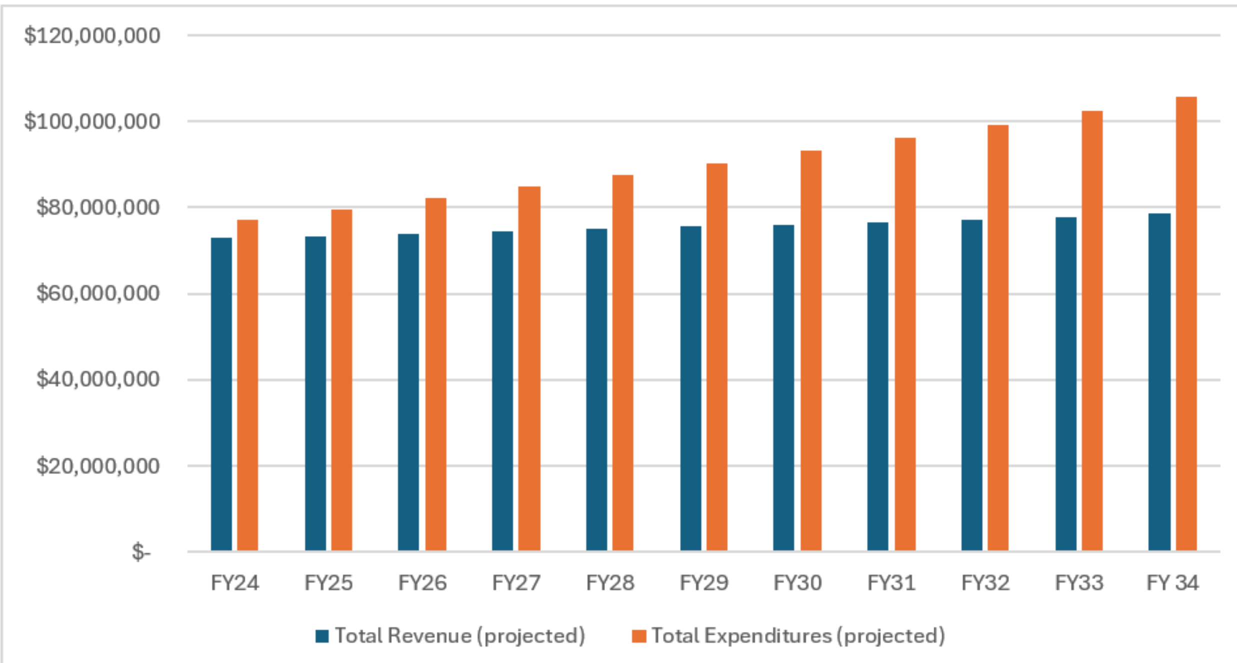


Figure 29). WMI's model indicates that expenditures will increase 3.6% per year from PFBC FY24 expenditures. The non-personnel expenditures are conservative in that the historical trend (5.6%) is greater than the estimated rate of inflation that was used in the model. The total difference between PFBC total revenues and expenditures during the FY25-FY34 period is $162.6 million. For comparison, the FY24 combined Fish Fund and Boat Fund ending balance was $145.8 million. Projections indicate that both PFBC combined fund ending balances and interest earnings from those balances will be depleted by FY34 at the latest. A funding strategy that uses only efficiency improvements will have to reduce both personnel and non-personnel costs to be viable.

Table 6. PFBC projected revenue and expenditures, FY25-FY34. Negative numbers are in red or are in parentheses.

Category		historical	projection											
		trend	trend	starting point										
Revenues		amount	amount	FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31	FY32	FY33	FY 34
	Fish Fund Licenses and Fees	0.0%	0.0%	$ 32,474,414	$ 32,474,414	$ 32,474,414	$ 32,474,414	$ 32,474,414	$ 32,474,414	$ 32,474,414	$ 32,474,414	$ 32,474,414	$ 32,474,414	$ 32,474,41
	Boat Fund Licenses and Fees	-1.3%	-1.3%	$ 8,904,274	$ 8,788,518	$ 8,674,268	$ 8,561,502	$ 8,450,203	$ 8,340,350	$ 8,231,926	$ 8,124,910	$ 8,019,287	$ 7,915,036	$ 7,812,14
	Federal and State Grants	0.9%	0.9%	$ 15,823,890	$ 15,966,305	$ 16,110,002	$ 16,254,992	$ 16,401,287	$ 16,548,898	$ 16,697,838	$ 16,848,119	$ 16,999,752	$ 17,152,750	$ 17,307,12
	Miscellaneous and Fines	16.4%	2.9%	$ 15,731,195	$ 16,187,400	$ 16,656,834	$ 17,139,882	$ 17,636,939	$ 18,148,410	$ 18,674,714	$ 19,216,281	$ 19,773,553	$ 20,346,986	$ 20,937,04
				$ 72,933,773	$ 73,416,637	$ 73,915,518	$ 74,430,790	$ 74,962,842	$ 75,512,073	$ 76,078,892	$ 76,663,724	$ 77,267,006	$ 77,889,186	$ 78,530,72
expenditures														
	Personnel	3.4%	3.4%	$ 48,860,649	$ 50,521,911	$ 52,239,656	$ 54,015,804	$ 55,852,342	$ 57,751,321	$ 59,714,866	$ 61,745,172	$ 63,844,508	$ 66,015,221	$ 68,259,73
	Non-personnel	5.6%	2.9%	$ 28,217,646	$ 29,035,958	$ 29,878,001	$ 30,744,463	$ 31,636,052	$ 32,553,497	$ 33,497,549	$ 34,468,978	$ 35,468,578	$ 36,497,167	$ 37,555,58
				$ 77,078,295	$ 79,557,869	$ 82,117,657	$ 84,760,267	$ 87,488,394	$ 90,304,819	$ 93,212,415	$ 96,214,149	$ 99,313,086	$102,512,388	$105,815,32
Summary				FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31	FY32	FY33	FY 34
			Total Revenue (	$ 72,933,773	$ 73,416,637	$ 73,915,518	$ 74,430,790	$ 74,962,842	$ 75,512,073	$ 76,078,892	$ 76,663,724	$ 77,267,006	$ 77,889,186	$ 78,530,72
			Total Expenditu	$ 77,078,295	$ 79,557,869	$ 82,117,657	$ 84,760,267	$ 87,488,394	$ 90,304,819	$ 93,212,415	$ 96,214,149	$ 99,313,086	$102,512,388	$105,815,32
	ratio of revenue to expenditures			$ 0.95	$ 0.92	$ 0.90	$ 0.88	$ 0.86	$ 0.84	$ 0.82	$ 0.80	$ 0.78	$ 0.76	$ 0.7
					$ (6,141,232)	$ (8,202,139)	$ (10,329,476)	$ (12,525,551)	$ (14,792,746)	$ (17,133,523)	$ (19,550,425)	$ (22,046,080)	$ (24,623,202)	$ (27,284,59

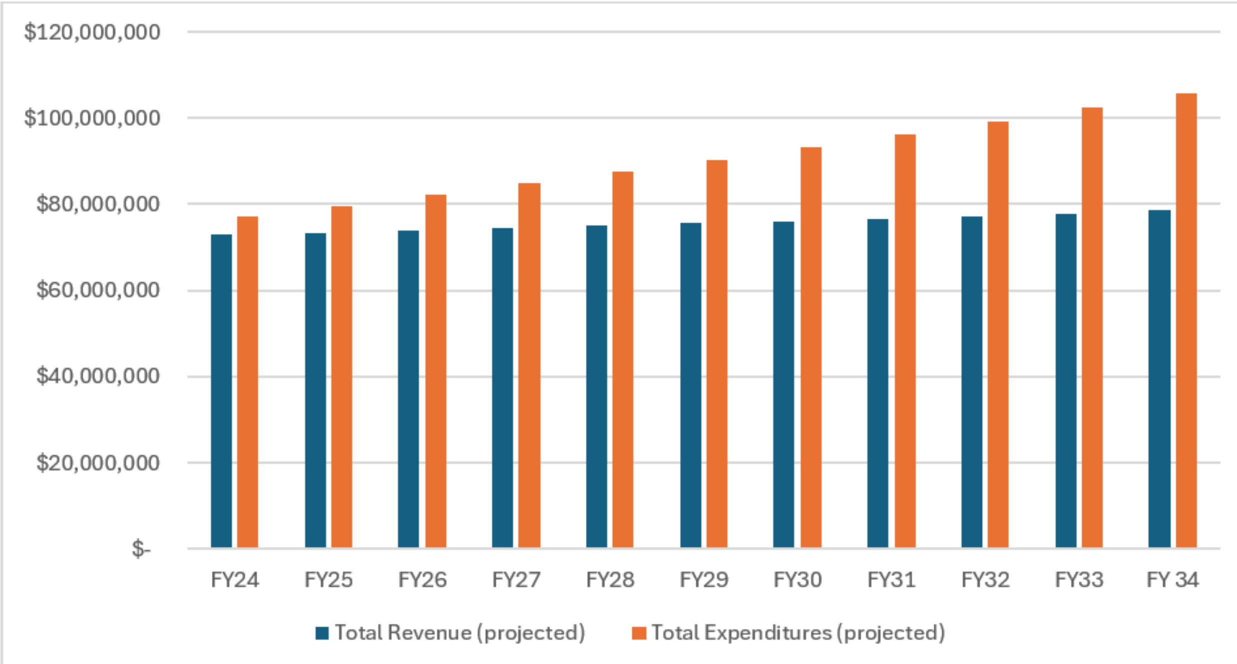


Figure 29. PFBC projected revenues and expenditures, FY25-FY34.

Areas of overlapping or redundant administrative and operational functions and corresponding opportunities for cooperative arrangements or shared services.

WMI reorganized the PGC staff complement (Table 2) and the PFBC staff complement (Table 4) to provide a line-by-line comparison of administrative units (Table 7). Some categories were combined with each commission to achieve similar comparisons. The majority of administrative categories were found in both commissions (Table 7, overlapping administrative units highlighted in green), and could be candidates for cooperative arrangements, shared services, or consolidation (with appropriate legislative authorization).

The combined workforce of both commissions was 1,298 in 2025 (Table 7), making the combined commissions one of the larger game and fish agencies in the country. In states with fish and game programs combined into a larger department of natural resources, several administrative functions could be combined to serve both programs. Most states have law enforcement units that serve both fish law and game law enforcement duties.

Table 7. Staffing complement in PGC and PFBC in 2025. Green highlights indicate administrative units that are overlapping or redundant in both commissions.

PGC Complement	2025 Filled	2025 Filled	PFBC Complement
Executive Office	10	2	Executive Office
Office of Legal Counsel	5	11	Office of Chief Counsel (plus Policy, Planning, and Communications Office)

Table 7. Staffing complement in PGC and PFBC in 2025. Green highlights indicate administrative units that are overlapping or redundant in both commissions.			
PGC Complement	2025 Filled	2025 Filled	PFBC Complement
Human Resources Office (plus HR Division)	9	4	Human Resources Office
Bureau of Admin Services	27	29	Bureau of Administration
Bureau of Information and Education (Plus Bureau of Marketing and Strategic Communications)	38	13	Bureau of Outreach, Education, and Marketing
Bureau of Wildlife Management	56		
Bureau of Habitat Management (minus Engineering)	40		
Engineering Division	8	46	Bureau of Engineering
		58	Bureau of Fisheries
		7	Bureau of Boating
		102	Bureau of Hatcheries
Bureau of Law Enforcement	95	84	Bureau of Law Enforcement
Bureau of Automated Technology Services	28	12	Bureau of Information Technology
Regional Offices	611		
		3	Uncounted Administrative Unit positions (Office of Admin (2), Office of Field Operations (1))
Total	**927**	**371**	
PGC appears to have several sworn law enforcement officers within the regional office headcount. PGC data provided by PGC. PFBC data from PA Legislative Budget and Finance Committee (2025). Performance audit of the PA Fish and Boat Commission.			

The feasibility and details of a unified fish and game conservation and boating law enforcement structure.

Comparison of PGC law enforcement metrics with similar states.

Among the five states selected for comparison, the average number of sworn conservation law enforcement (CLE) positions was 222 people (Table 8). PGC was slightly above average in number of positions. The ratio of PA paid hunting license holders to PGC CLE in PA was the highest among comparison states, while the average area covered per CLE was second lowest. CLE positions in the comparison states are responsible for both fishing and wildlife law enforcement duties.

Table 8. Comparison of PGC law enforcement metrics with similar states. Conservation law enforcement is abbreviated as CLE. Ohio and New York have boating-related enforcement in other agencies.					
State	Size (square miles)	Paid Hunting License Holders (2023 license year)	2026 Sworn CLE	Paid Hunting License Holders per CLE	Size (Square miles) per CLE
Michigan	56,539	625,517	277	2,258	204
Ohio	40,953	354,922	134	2,649	306
PGC	44,820	1,016,946	236	4,309	190
Minnesota	79,617	532,443	200	2,662	398
Wisconsin	54,314	655,095	221	2,964	246
New York	47,224	541,680	278	1,948	170

Comparison of PFBC law enforcement metrics with similar states.

Among the five states selected for comparison, the average number of sworn CLE positions for fishing-related law enforcement was 222 people (Table 9). PFBC had the lowest number of positions among the comparison states. The ratio of PA paid fishing license holders to PFBC CLE and the average area covered per CLE were the highest among comparison states. CLE positions in the comparison states are responsible for both fishing and wildlife law enforcement duties. Ohio and New York have boating-related enforcement in a separate agency/division.

Table 9. Comparison of PFBC law enforcement metrics with similar states. Conservation law enforcement is abbreviated as CLE.					
State	Size (square miles)	Paid Fishing License Holders (2023 license year)	2026 Sworn CLE	Paid Fishing License Holders per CLE	Size (square miles) per CLE
Michigan	56,539	1,090,840	277	3,938	204
Ohio*	40,953	826,619	134	6,169	306
PFBC	44,820	1,060,523	101	10,500	444
Minnesota	79,617	1,326,301	200	6,632	398
Wisconsin	54,314	1,295,764	221	5,863	246
New York*	47,224	857,244	278	3,084	170
* Ohio and New York have water patrol officers in a separate agency/division and are not included in their CLE number shown above.					

A unified fish and game conservation and boating law enforcement structure

The combined law enforcement complement of PGC and PFBC totals 337 sworn officers as of March 2026, including vacant positions. This number exceeds the conservation law enforcement (CLE) total in any comparable state. PGC has a comparable number of sworn CLE to the other states selected for comparison. PFBC has the lowest number of sworn CLE among comparison states. The critical distinction between Pennsylvania and other states is that Pennsylvania divides CLE responsibilities between two agencies, which dilutes per-officer efficiency when measured against participation ratios. To our knowledge, the majority of states have combined fisheries and wildlife law enforcement into one unit. Some states have boating safety separate from fisheries-related law enforcement (e.g., Ohio).

Assuming peak fishing (and boating) and peak hunting activities occur at different times of year, unifying the law enforcement structure of the two commissions would be a practical step toward improving fishing and boating-related law enforcement efforts of PFBC. The improvement in PFBC enforcement needs would be realized by having the full complement of PA CLE officers responsible for fishing and boating-related law enforcement, providing more coverage during peak seasons.

PGC would financially benefit from a unified enforcement structure. Based on comparison state information, a combined workforce of 222 people could meet existing needs. PGC would benefit from position savings and from new revenues contributed by PFBC for a portion of each officer's compensation in a unified program. Depending on the time-sharing agreement which would specify what portion of CLE time is charged to the PFBC Fish Fund and PFBC Boat Fund, PFBC could see some savings in personnel compensation as well. Any budget savings could be used to increase compensation (if authorized by the PA Office of Administration) for the expanded roles of existing officers and for any additional equipment to ensure all CLE officers are appropriately equipped. Based on information received, CLE personnel also assist other non-law enforcement activities within their respective commission. Likely, additional technician-level positions would be needed in each commission. Based on WMI revenue and expenditure projections (see Long-term projections of expenses, revenues, and funding strategies) personnel savings will be needed to ensure future revenues and expenditures are balanced in both commissions.

Both commissions would have additional benefits from a unified CLE structure. Currently, each commission has a separate training school facility. Using a common training platform would likely increase class size, reducing the training costs per candidate.

Standardized training would also improve the ability of CLE officers to provide support to other CLE officers when needed. Currently, some support needs are provided by the deputy law enforcement volunteers in both commissions. The deputy law enforcement program in both commissions is a legacy program with declining participation. Deputies receive minimal training before being issued a badge, citation book, and authorization to carry a firearm. Both agencies reported an increase in confrontational engagements during enforcement activities. Using fully trained CLE officers to provide support would reduce potential liability risks of using minimally trained deputies as support.

The question of which commission ultimately would supervise a unified law enforcement structure is an important issue to consider. PGC should supervise the structure, with consultation from PFBC that has the responsibility to ensure Fish Fund and Boat Fund expenditures are benefiting the purposes of both funds under PFBC authority. In our assessment, PFBC CLE duties should be merged into PGC CLE job descriptions and appropriately compensated by PFBC.

Opportunities to increase efficiency among the Commissions' physical assets.

WMI identified approximately 101 occupied office locations distributed across Pennsylvania's 67 counties as of March 2026, with PGC managing the majority (Figure 30). PGC maintains a headquarters complex in Harrisburg, the Ross Leffler School of Conservation in Harrisburg, and six regional offices: Northwest (Franklin, PA), Southwest (Ligonier, PA), Northcentral (Jersey Shore, PA), Southcentral (Huntingdon, PA), Northeast (Dallas, PA), and Southeast (Reading, PA). Each regional office serves as the administrative hub for field operations in that region. PGC field staff, particularly State Game Wardens and wildlife biologists, are typically stationed at individual county or sub-county offices rather than at regional headquarters.

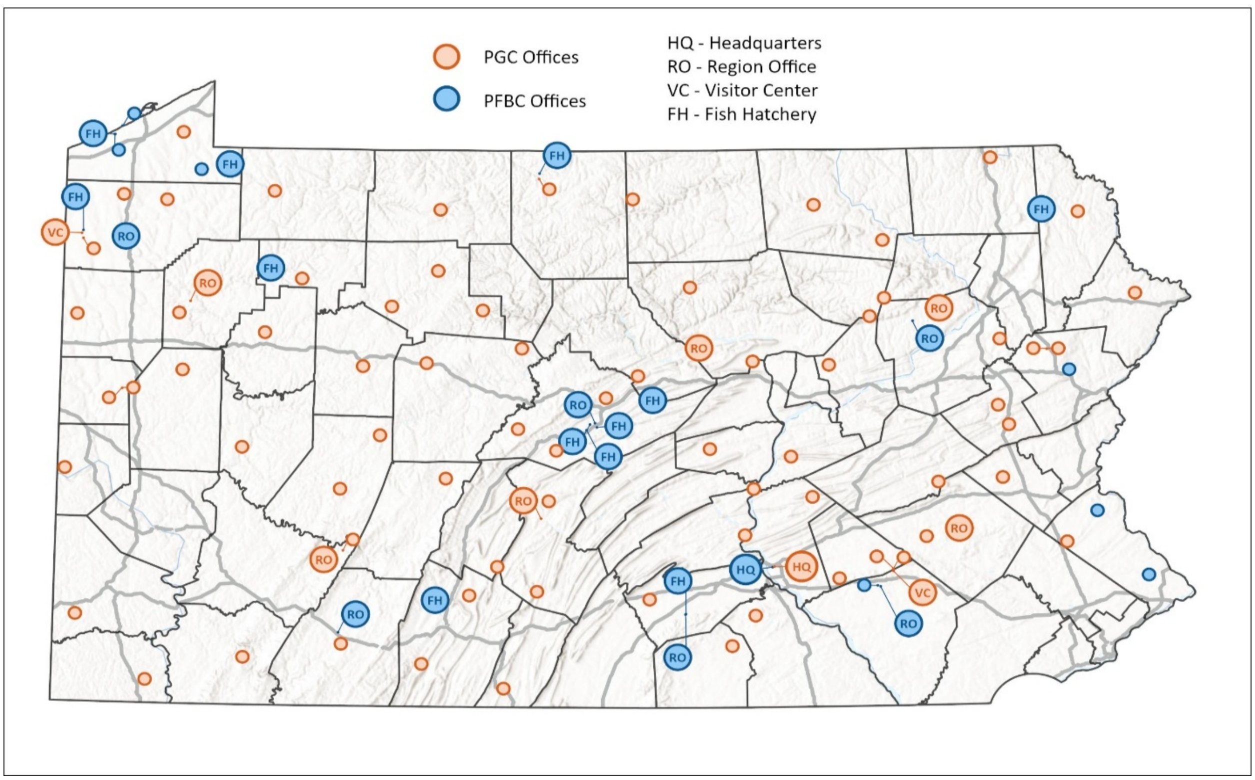


Figure 30. Occupied office locations of PGC and PFBC staff in March 2026.

PFBC maintains its headquarters in Harrisburg and operates six regional law enforcement offices: Northwest (Meadville, PA), Southwest (Somerset, PA), Northcentral (Bellefonte, PA), Southcentral (Newville, PA), Northeast (Sweet Valley, PA), and Southeast (Elm, PA). Waterways Conservation

Officers are typically stationed at the individual district (county) level. Staff from other organizational units within the PFBC are also housed at regional offices or other sub-regional locations, each reporting to their respective chains of command. PFBC operates 12 state fish hatcheries, the Union City Aquatic Conservation Center, and the Van Dyke Research Station. PFBC also operates the H.R. Stackhouse School of Fishery Conservation and Watercraft Safety (Bellefonte, PA) for its law enforcement training program, boating safety and water rescue training, workshops, and meetings.

WMI compared the number of field office locations (including regional offices) with five comparison states (Table 10). PGC has 74 occupied field offices compared to an average of 29 field offices in five comparison states. PFBC has 15 field offices (plus hatchery locations) compared to an average of 19 field offices in five comparison states. Reducing the number of field offices to the five-state average for wildlife would reduce annual maintenance costs and eliminate some deferred maintenance needs. Co-locating PFBC and PGC staff in these offices would reduce administrative costs per office and potentially further reduce the number of field office locations occupied.

Table 10. Number of wildlife field offices and fisheries field offices in MI, OH, PA, MN, WI, and NY. Number includes regional offices. Some offices have both wildlife and fisheries field staff co-located.

State	Size (sq. mi)	Wildlife Field Offices	Fisheries Field Offices	Hatcheries
Michigan	56,539	24	11	6
Ohio	40,953	20	11	6
PFBC	44,820		15	12
PGC	44,820	74		
Minnesota	79,617	45	29	4
Wisconsin	54,314	33	33	9
New York	47,224	23	11	13
Five -State Average	52,612	29	19	7.6

The geographic distribution of occupied offices for both commissions shows substantial geographic overlap in nearly every region of the state. PFBC and PGC regional offices are in close proximity (adjacent counties) in five of six locations. This overlap is a direct consequence of parallel organizational structures built to serve the same geographic customer base from separate institutional authorities. From a physical asset perspective, this overlap represents an opportunity for co-location and facility and staff consolidation.

Co-location of PGC and PFBC field offices at the county or regional level presents a meaningful opportunity to reduce facility overhead and staffing while improving customer service access. Where both agencies currently maintain separate offices serving the same county or service area, consolidation into a single shared facility would reduce utility costs, maintenance obligations, lease payments (where applicable), and IT infrastructure duplication. The magnitude of potential savings depends on the number of co-locatable facilities, current lease vs. ownership status, and whether consolidation would require construction or renovation. Equally important is an evaluation of staffing plans in these offices to consolidate positions which are redundant.

PFBC and PGC have different hierarchy and reporting structures. PFBC has a “spokes of a wheel” model reporting through their respective chains of command to HQ while PGC regional staff all report to a regional director who reports to the central office (Laurel Anders, Deputy Executive Director, PFBC. personal communication). There was concern that consolidation of regional offices between commissions may challenge any gains in efficiency from co-location. As noted in the above paragraph, WMI suggests numerous benefits of consolidation. Co-locating agencies with uniquely different administrative structures has occurred. An example would be the USDA Service Centers, which are locations where you can connect with Farm Service Agency, Natural Resources Conservation Service, and/or Rural Development employees. Each of these federal agencies has unique administrative structures but usually share a common location. Because the work of these agencies often overlaps, creation of the service centers was seen to improve customer service.

A related service delivery benefit from co-location was highlighted in both the SWOT survey and interviews (Appendix C): members of the public already perceive PGC and PFBC as a single entity, and some constituents arrive at one commission’s office seeking services from the other commission. A shared office location, shared customer service counter, or co-located field presence would directly address this confusion while improving the public’s ability to access both commissions’ services on a single visit. The Statement of Work specifically identifies the goal of maximizing customer efficiency. Physical co-location is one of the most direct mechanisms for achieving it, although customers may have to travel further to a location for service.

Cost savings and improvements to service delivery that translate to greater investments in and benefits to hunting, trapping, fishing, and boating and the Commissions’ trust resources, customers, and staff.

Personnel

WMI used Table 7 as the starting point for this objective. Our approach was to examine the current number of personnel in each unit and the overall structure of the commissions for opportunities for cost savings. The two commissions had a total staff complement of 1,298 in 2025.

The Executive office usually contains the positions of Director, Deputy Director(s), and Executive Assistant. PGC has 10 positions in the executive office while PFBC has two. Positions that directly report to the Director can be considered as part of the Executive office, such as the Chief Counsel. The office of Chief Counsel usually contains the positions of Chief Counsel, 1-2 lawyers, and 1-2 administrative professionals. In addition, the executive group often has an assistant for the Commission Board and an administrative professional. In our table, we combine Office of Chief Counsel with the Policy, Planning, and Communications Office in PFBC. We also combined Office of Chief Counsel with a Legal position in PGC found in a Bureau. PGC has five positions in the Chief

Counsel while PFBC has 11 positions. The combination of Executive Office and Chief Counsel offices results in 15 positions in PGC and 13 positions in PFBC, for a total of 28 positions. Regardless of whether consolidation of these positions is implemented, a cost savings could be found by reducing the number of positions in the executive grouping to 10 positions.

The Human Resources Offices of PGC and PFBC contain a total of 13 positions. Coordinating HR needs between the two commissions could result in cost savings by eliminating the need for two HR Office supervisors (a savings of one position) and potentially by reducing two additional positions upon consolidation. The PFBC Human Resources Supervisor supervised only three people in 2025. We would recommend consolidating this office with another PFBC office if PGC/PFBC coordination is not achieved.

Both commissions have a Bureau of Administration. The two Bureaus have approximately the same number of staff even though PGC has a much larger total staffing complement than PFBC. PFBC could find cost savings by proportionally reducing its Bureau of Administration complement to 10 positions. Coordination of administration between the two commissions would likely result in additional cost savings of five positions, but a more in-depth study of individual position roles and responsibilities would need to occur to determine an appropriate number of positions.

The overall area of communications, including information, education, marketing, outreach, and strategic communications appears proportional in size between the two commissions. PGC has 38 positions while PFBC has 13. Cost savings could be found by sharing platforms (one website instead of separate websites, consolidating two magazines into one publication, etc.), thus realizing savings in both personnel (eliminating redundant positions) and non-personnel expenditures. Both commissions would benefit from cross-marketing of opportunities for outdoor enthusiasts.

The engineering units of PGC and PFBC total 54 positions, although a large majority are in PFBC. In the collective experience of the WMI authors, a ceiling of 15 engineering positions is appropriate. PFBC may have positions in this unit that are typically found elsewhere in natural resource organizations. Likely all cost savings would be made with a reduction in staff in the PFBC engineering unit. A more in-depth study of individual position roles and responsibilities would need to occur to determine an appropriate number of positions.

Information Technology is an area where available budget may dictate the size of the bureaus, as creation of new tools seems to be exponentially increasing. Cost savings could be achieved by coordinating activities between the two commissions, but we do not suggest reducing staffing in this area.

The Bureau of Law Enforcement (PFBC) and the Bureau of Law Enforcement (PGC) were previously discussed in “The feasibility and details of a unified fish and game conservation and boating law enforcement structure” Section. A significant cost savings could be realized by downsizing conservation law enforcement staffing to comparable levels with other states. Benchmarked agencies contain an average of 115 fewer positions.

The PGC regional offices, and the Bureaus of Wildlife Management and Wildlife Habitat Management were not critically examined for cost savings. A roles and responsibilities exercise would likely suggest that PGC flatten the administrative structure for efficient operations. As noted in the Recommendations section, consolidation of regional offices and a critical examination of field office locations will result in cost savings for both personnel and non-personnel expenditures. These units did not overlap between agencies and thus were not examined for potential efficiencies that could be gained.

The PFBC Bureaus of Fisheries, Boating, and Hatcheries were not critically examined for cost savings. A roles and responsibilities exercise would likely flatten the administrative structure and improve organizational flow for efficient operations. These units did not overlap between agencies and thus were not examined for potential efficiencies that could be gained.

Our review suggests that comparable agencies contain approximately 221 fewer positions. For Pennsylvania, efficiencies could be realized through unified law enforcement, reductions in executive/legal counsel staffing, reductions in engineering staff, and smaller reductions in other areas of operation (Table 11). This would amount to 17.0% reduction in workforce in the two commissions combined and would contribute substantially to efforts to reduce personnel costs during the next 10 years. Based on combined personnel expenditures of $200 million in 2024, a savings of approximately $34.0 million ($200 million * 17.0%) annually could potentially be realized each year. Importantly, a reduction would reset the starting point for long-term projections of personnel expenditures, assuming personnel salaries and benefit costs will continue to increase. Additional savings could be realized by examining roles and responsibilities of both commissions with a goal of flattening the organizational structure.

Table 11. Potential position reductions based on benchmark comparisons with five similar states and areas of significant overlap between commissions.

Administrative Unit	Combined FY25 filled positions	Potential reductions as suggested by benchmark analysis	Remaining filled positions
Executive office/ Office of Chief Counsel	28	19	9
Human Resources	13	3	10
Bureau Administrative Services	56	24	32
Bureau of Information, Education, Marketing, Outreach, Strategic Communications	51	21	30

Table 11. Potential position reductions based on benchmark comparisons with five similar states and areas of significant overlap between commissions.			
Administrative Unit	Combined FY25 filled positions	Potential reductions as suggested by benchmark analysis	Remaining filled positions
Bureau of Wildlife Management	56	0	56
Bureau of Wildlife Habitat Management (minus engineering)	40	0	40
Engineering	54	39	15
Bureau of Fisheries	58	0	58
Bureau of Boating	7	0	7
Bureau of Hatcheries	102	0	102
Bureau of Law Enforcement	179*	115	64
Bureau of Information Technology	40	0	40
Regional Offices	611	0*	611*
Uncounted Admin Unit leaders	3	0	3
Total	1,298	221	1,077
* Several law enforcement positions are in regional offices. Reductions in CLE are all taken from Bureau of Law Enforcement line but reductions will affect both the Bureau of Law Enforcement and the Regional Offices.			

Non-Personnel Expenditures

The overall area of communications, including information, education, marketing, outreach, and strategic communications could obtain reductions in cost by a) merging websites, b) consolidating magazines into one publication (as an alternative) potentially moving the magazines from print to digital media), c) consolidating multiple brands within both commissions into a single branding effort for fishing, boating, hunting, and trapping.

Closing field offices that are no longer occupied in a redesigned field office location plan (see Opportunities to increase efficiency among Commissions' physical assets section) would likely reduce deferred maintenance expenditures, annual operating expenses, and on-going maintenance costs. WMI did not examine deferred maintenance needs/costs of the commissions in detail. Commissions should be aware that demolition costs will need to be factored into future budget expenditures.

Any necessary legislative or regulatory actions required to implement such changes.

The Game and Wildlife Code (Title 34 of the Pennsylvania Consolidated Statutes) and the Fish and Boat Code (Title 30 of the Pennsylvania Consolidated Statutes) vest independent administrative and enforcement authority in each respective commission and establish dedicated special funds whose expenditures are tightly circumscribed by statute and federal assent conditions. This section identifies the principal statutory and regulatory barriers to the efficiency and collaboration pathways described in the Recommendations section of this report and frames recommended legislative and regulatory actions necessary to enable them.

The most significant barrier is the dedicated fund structure. Any shared services arrangement that requires one agency to pay for services that benefit both agencies must include a cost-allocation mechanism that ensures each fund bears only expenditures authorized under its respective title. Without such a mechanism, even a well-intentioned shared IT platform, joint HR function, or centralized dispatch operation could constitute an impermissible expenditure under Title 30, Title 34, or federal assent language. Legislative clarification of the fund expenditure provisions in both Codes to explicitly authorize proportional cost-sharing for joint administrative services would remove this ambiguity. Consultation with the US FWS is also suggested to determine if there are any federal assent concerns.

The Game Fund is appropriated exclusively for purposes authorized under Title 34 and is subject to the federal Pittman-Robertson assent prohibition against diverting hunting license fees, codified at 34 Pa.C.S. § 322; the Fish Fund and Boat Fund are appropriated to PFBC under Title 30 for purposes related to fish and fishing, and boats and boating, codified at 30 Pa.C.S. § 521 and § 531, respectively. The PFBC gained flexibility for use of moneys between the Fish Fund and Boat Fund through Act 45 of 2025 (section 1736-E), which allowed both funds to provide use benefits provided the benefits to the original fund exist. Neither commission receives general fund appropriations, and both are mostly user funded.

These foundational statutory structures mean that neither commission can unilaterally reallocate revenues to support joint operations with the other, and neither can direct staff to perform functions outside the scope of their authorizing title without express legislative amendment or a well-structured memorandum of understanding that ensures costs are charged proportionally to the fund benefiting from each activity.

WMI identified three statutory barriers that may prevent otherwise efficient shared services arrangements: a) fund appropriation constraints requiring clarification to authorize proportional cost-sharing; b) personnel authority provisions requiring amendment to authorize shared or cross-designated appointments; and c) property use restrictions under 34 Pa.C.S. §§ 721-722 and 30 Pa.C.S. § 741 requiring amendment to authorize shared facility occupancy.

Both Titles vest personnel authority in their respective commission or executive director. There is no current provision in either Code that authorizes the assignment, secondment, or shared appointment of employees across both agencies (an exception is a provision for joint enforcement by CLE personnel in both commissions). Consolidation of any function, whether IT, HR, communications, or law enforcement dispatch, will ultimately require either a statutory joint appropriation mechanism or a cost-sharing agreement framework with sufficient specificity to withstand legislative and federal audit scrutiny. Either pathway requires legislative action. A statutory mechanism for shared or cross-designated personnel appointments, similar in structure to cooperative agreements already authorized in both Codes for intergovernmental cooperation with federal and other state agencies, would be required before staff from one agency could perform functions on behalf of both.

Under 34 Pa.C.S. § 721-722, State Game Lands and Commission-controlled properties are to be used for wildlife conservation purposes. PFBC properties are governed by 30 Pa.C.S. § 741. Co-location of both agencies in shared facilities is possible where agency-leased offices are involved, but co-location at state-owned conservation facilities may require statutory clarification to ensure that shared use does not trigger property designation challenges.

Any shared or unified law enforcement training program that results in a single graduation producing officers with authority under both Title 34 and Title 30 would require statutory definition of the training standards, the appointing authority for cross-commissioned officers, and the liability and indemnification framework. This would require coordinated amendments to both Codes as well as engagement with the Municipal Police Officers Education and Training Commission regarding any implications for accreditation standards.

Recommendations

Long-Term Financial Trends and Funding Strategy Considerations.

Recommendation 1.
Forecasts of revenues and expenditures require both commissions to consider reductions in both personnel and non-personnel expenditures to ensure sustainability of both commissions' mission and goals.

Recommendation 2.
WMI recommends formal establishment of a minimum ending fund balance for the PGC Game Fund, PFBC Fish Fund, and PFBC Boat Fund. We would suggest an ending fund balance of 75% of previous annual expenditure as a reasonable goal, recognizing that appropriate ending balance percentages for many natural resource agencies funds are trending downward.

Recommendation 3.
WMI recommends a price elasticity study of license pricing structure to determine future willingness to pay increased fees.

Recommendation 4.
WMI recommends an in-depth fiscal study of alternative funding models that would expand contributions from the public and reduce dependence on traditional user-pay models.

Administrative and Operational Functions.

Recommendation 5.
WMI recommends consolidation of PGC and PFBC bureaus and offices that overlap in work duties (Table 7, those bureaus/offices highlighted in green).

Recommendation 6.
WMI recommends staffing reductions in the overlapping areas of executive office/chief counsel, human resources, bureau of administration, bureau of information (including information, education, marketing, outreach and strategic communications), engineering, and law enforcement.

Recommendation 7.
WMI recommends a roles and responsibility study for PGC Bureau of Wildlife Management, PGC Bureau of Wildlife Habitat Management, PGC Regional offices, and PFBC Bureau of Fisheries for the purpose of determining potential flattening of staff roles. These units did not overlap between agencies and thus were not examined for potential efficiencies that could be gained.

The feasibility and details of a unified fish and game conservation and boating law enforcement structure.

Recommendation 8.
WMI recommends unification of PGC Bureau of Law Enforcement and PFBC Bureau of Law Enforcement. All PGC staff with the primary duty of law enforcement should be recognized in the new combined unit.

Recommendation 9.
WMI recommends reduction in PGC/PFBC sworn law enforcement positions from the current 337 positions. (Benchmark comparisons from five similar states indicate a potential target for further evaluation by the agency of approximately 222 positions.)

Recommendation 10.
WMI recommends elimination of deputy law enforcement positions in both commissions.

Recommendation 11.
WMI recommends consolidation of conservation law enforcement training programs into one training program for all new recruits to PA conservation law enforcement.

Opportunities to increase efficiency among the Commissions' physical assets.

Recommendation 12.
WMI recommends agency evaluation of the 74 PGC field offices to determine whether the co-location of staff from both commissions and moving closer to the benchmarked average of 29 field offices is warranted or feasible.

Recommendation 13.
WMI recommends building demolition costs of buildings that have reached the end of their useful life into annual budgets.

Cost savings and improvements to service delivery that translate to greater investments in and benefits to hunting, trapping, fishing, and boating and the Commissions' trust resources, customers, and staff.

Recommendation 14.
WMI recommends consolidating two commission websites into one website.

Recommendation 15.
WMI recommends consolidating PGC magazine and PFBC magazine into one publication. Consider whether to convert from print format to a new digital format.

Recommendation 16.
WMI recommends consolidating multiple brands within both commissions into a single branding effort for fishing, boating, hunting, and trapping. This effort should include cross-marketing of outdoor recreation opportunities.

Any necessary legislative or regulatory actions required to implement such changes.

Recommendation 17.
WMI recommends that both agencies obtain formal written legal opinions from counsel documenting the specific fund-use restrictions under Title 34 and Title 30 that govern any joint program expenditure, as a foundational prerequisite to all other shared services and consolidation actions.

Recommendation 18.

WMI recommends that the two commissions request that the General Assembly authorize a joint services fund or shared services framework with proportional charging authority before undertaking any broad consolidation. Consultation with the US FWS is also suggested to determine if there are any federal assent concerns.

Recommendation 19.

WMI recommends both commissions request a statutory mechanism for shared or cross-designated personnel appointments, similar in structure to cooperative agreements already authorized in both Codes for intergovernmental cooperation with federal and other state agencies before staff from one agency could perform functions on behalf of both.

Recommendation 20.

WMI recommends both commissions request a specific amendment authorizing shared occupancy agreements between the two commissions, without affecting underlying property control or fund obligations, to resolve this uncertainty.

Literature Cited

Coinnews Media Group. (2026). U.S. Inflation Calculator. https://www.usinflationcalculator.com/inflation/consumer-price-index-and-annual-percent-changes-from-1913-to-2008/ Accessed July 2026.

Council to Advance Hunting and Shooting Sports. (n.d.). Hunting License Sales 2022-2023. (https://cahss.org/our-research/hunting-license-sales-2022-2023/) Accessed July 2026.

Econforecasting.com. (2026). U.S. Inflation (CPI-U) – Forecast Chart. https://econforecasting.com/forecast/cpi. Accessed June 15, 2026.

Federal Reserve Bank of Cleveland. (2026). "Inflation Expectations." https://doi.org/10.26509/frbc-infexp. Accessed July 2026.

Official Data Foundation / Alioth, LLC. In2013Dollars.com. (2026). US CPI data. https://www.in2013dollars.com/us-cpi. Accessed June 2026.

Pennsylvania Consolidated Statutes, Title 30 (Fish and Boat Code). Commonwealth of Pennsylvania.

Pennsylvania Consolidated Statutes, Title 34 (Game and Wildlife Code). Commonwealth of Pennsylvania.

Pennsylvania Department of Health. (2025). *Pennsylvania vital statistics 2023.* Commonwealth of Pennsylvania. https://www.pa.gov/content/dam/copapwp-pagov/en/health/documents/topics/healthstatistics/vitalstatistics/pavitalstatistics/documents/pa_vital_statistics_2023.pdf.

Pennsylvania Fish and Boat Commission. (2011-2024). *Annual reports and strategic plans*. Commonwealth of Pennsylvania. https://www.pa.gov/agencies/fishandboat/about-us/agency-overview/reports-strategic-plans.

Pennsylvania Game Commission. (2013-2024). *Annual reports and surveys*. Commonwealth of Pennsylvania. https://www.pa.gov/agencies/pgc/about-us/reports-surveys.

Pennsylvania Legislative Budget and Finance Committee. (1989a). Report on a study of the financial feasibility and potential impacts of a merger of the Pennsylvania Fish Commission and the Pennsylvania Game Commission: Vol 1. 317 pages. https://www.palbfc.gov/Resources/Documents/Reports/33.pdf (Accessed January 2026).

Pennsylvania Legislative Budget and Finance Committee. (1989b). Report on a study of the financial feasibility and potential impacts of a merger of the Pennsylvania Fish Commission and the Pennsylvania Game Commission: Vol II – Information on the study questionnaire process and questionnaire responses and comments. 81 pages. https://www.palbfc.gov/Resources/Documents/Reports/34.pdf (Accessed January 2026).

Pennsylvania Legislative Budget and Finance Committee. (2003). An update on the feasibility of a combined fish and wildlife commission for Pennsylvania. 201 pages. https://www.palbfc.gov/Resources/Documents/Reports/131.pdf. (Accessed January 2026).

Pennsylvania Legislative Budget and Finance Committee. (2014). An update on the feasibility of a combined fish and wildlife commission for Pennsylvania. 162 pages. https://www.palbfc.gov/Resources/Documents/Reports/488.pdf. (Accessed January 2026).

Pennsylvania Legislative Budget and Finance Committee. (2025). Performance Audit of the PA Fish and Boat Commission. https://www.palbfc.gov/Resources/Documents/Reports/804.pdf

Saputra, W., W. Kirati, D. Hughes, and T.W. Patzek. (2024). Forecast of economic gas production in the Marcellus Shale. AAPG Bulletin, 108(1): 15-40.

U.S. Census Bureau. (2025). *State population totals and components of change: 2020-2024*. https://www.census.gov/data/tables/time-series/demo/popest/2020s-state-total.html.

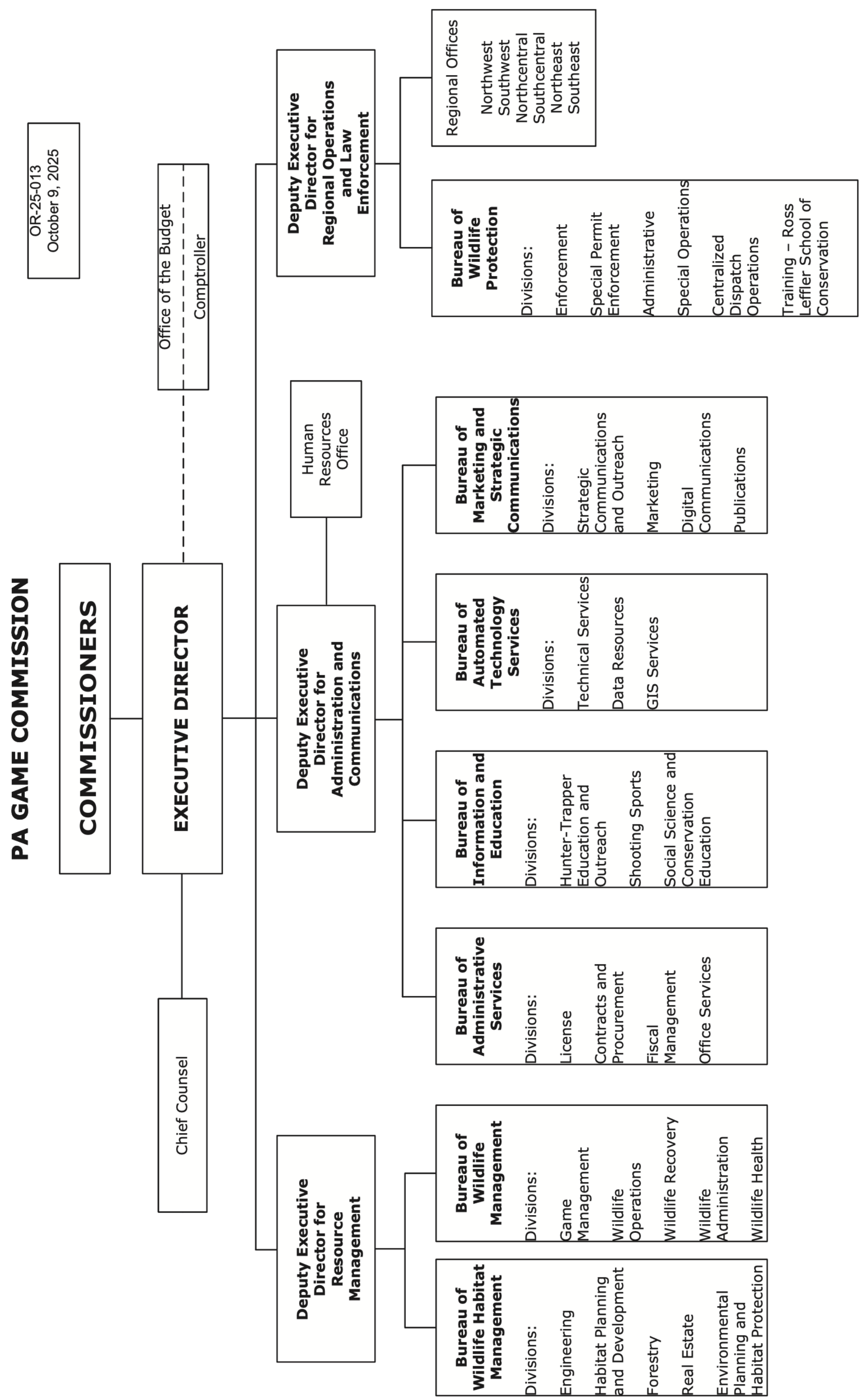
U.S. Coast Guard. (2025). Recreational boating statistics 2024 (Table 36). U.S. Department of Homeland Security. https://www.uscgboating.org/library/accident-statistics/Recreational-Boating-Statistics-2024.pdf Table 36. (Accessed July 2026)

U.S. Fish and Wildlife Service, Wildlife and Sport Fish Restoration Program. (2026). *Partner with a payer: Wildlife restoration funding sources and apportionment data*. U.S. Department of the Interior. https://partnerwithapayer.org/funding-sources/ (Accessed January 2026).

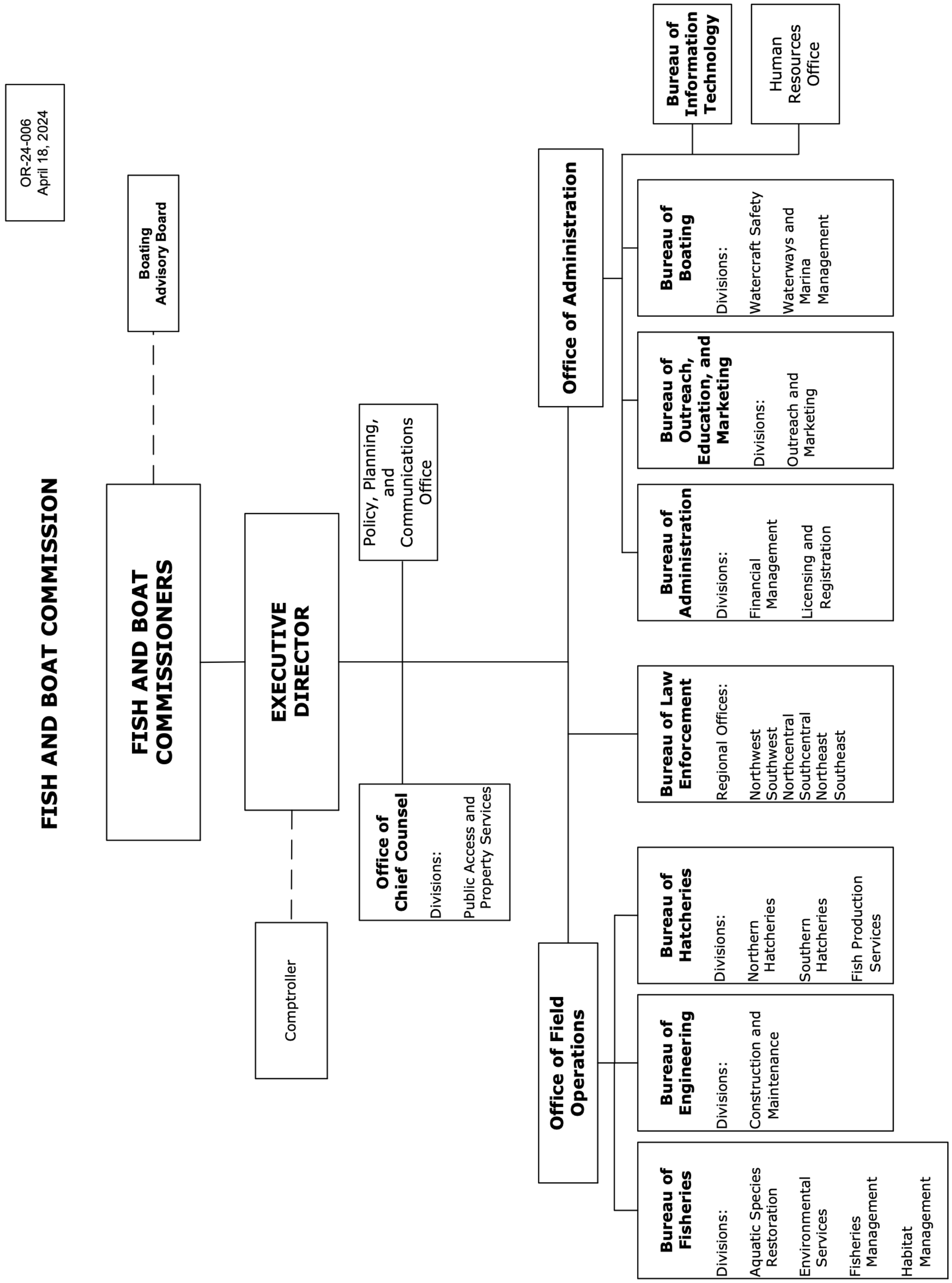
VanDerLaan, J. (2024). U.S. Hunting Statistics, Facts and Trends: Here are the numbers. https://www.deerhuntingguide.net/us-hunting-statistics.html. (Accessed July 2026)

Wildlife Management Institute. (1962). *Evaluation of the Pennsylvania Game Commission and Pennsylvania Fish Commission*. Wildlife Management Institute.

Appendix A. Organizational Charts



THIS PAGE INTENTIONALLY LEFT BLANK.


OR-24-006
April 18, 2024
FISH AND BOAT COMMISSION
Boating Advisory Board
FISH AND BOAT COMMISSIONERS
EXECUTIVE DIRECTOR
Comptroller
Policy, Planning, and Communications Office
Office of Chief Counsel
Divisions:
Public Access and Property Services
Office of Field Operations
Bureau of Fisheries
Divisions:
Aquatic Species Restoration
Environmental Services
Fisheries Management
Habitat Management
Bureau of Engineering
Divisions:
Construction and Maintenance
Bureau of Hatcheries
Divisions:
Northern Hatcheries
Southern Hatcheries
Fish Production Services
Bureau of Law Enforcement
Regional Offices:
Northwest
Southwest
Northcentral
Southcentral
Northeast
Southeast
Office of Administration
Bureau of Administration
Divisions:
Financial Management
Licensing and Registration
Bureau of Outreach, Education, and Marketing
Divisions:
Outreach and Marketing
Bureau of Boating
Divisions:
Watercraft Safety
Waterways and Marina Management
Bureau of Information Technology
Human Resources Office

THIS PAGE INTENTIONALLY LEFT BLANK.

Appendix B. Statement of Work and Purchase Order

STATEMENT OF WORK
9-19-25

Background/Objectives
A study will be undertaken to analyze opportunities for cooperation and improved efficiency between the Pennsylvania Game Commission (PGC) and Pennsylvania Fish and Boat Commission (PFBC). The Commissions are independent administrative agencies with complementary missions, overlapping customer bases, and increasing fiscal and operational demands. To maximize investments in the Commissions' trust resources, achieve efficiencies that benefit customers and staff, and preserve independent and specialized board governance, the Commissions are undertaking this evaluation of opportunities for cooperation, shared services, and potential consolidation of select functions.

The Commissions will contract with a pre-qualified vendor with exceptional expertise in state fish and game administration, operations, and organizational management to conduct the analysis which will provide a foundational structure for Pennsylvania's fish and game conservation for years to come.

The vendor will:

1) Provide a full range of professional consultative services relating to state fish and game operations analysis.

2) Conduct an evaluation of:
    a. Long-term projections of expenses, revenues, and funding strategies.
    b. Areas of overlapping or redundant administrative and operational functions and corresponding opportunities for cooperative arrangements or shared services.
    c. The feasibility and details of a unified fish and game conservation and boating law enforcement structure.
    d. Opportunities to increase efficiency among the Commissions' physical assets.
    e. Cost savings and improvements to service delivery that translate to greater investments in and benefits to hunting, trapping, fishing, and boating and the Commissions' trust resources, customers, and staff.
    f. Any necessary legislative or regulatory actions required to implement such changes.

3) Produce a report of findings and proposed recommendations within six (6) months of engagement.

Project Scope
Pennsylvania is the only state in the nation with separate game and fish management agencies. The PGC was established in 1895 and is the independent administrative commission of the Commonwealth responsible for the management of Pennsylvania's wildlife and wildlife habitat resources, including the regulation and promotion of hunting and trapping (Title 34 Pa.C.S.). Information on PGC can be found at pa.gov/PGC. The PFBC was established in 1866 and is the independent administrative commission of the Commonwealth responsible for the management of Pennsylvania's aquatic resources, including the regulation and promotion of fishing and boating (Title 30 Pa.C.S). Information on PFBC can be found at FishandBoat.com.

The Commissions operate with separate administrative and operational functions. They have overlapping customers and constituencies whose hunting license, fishing license, and boat registration and launch permit fees separately fund the agencies, while the Commissions' resource conservation, public safety, educational, and recreational mandates are complementary. Overlapping geographies, responsibilities, and functions may reveal redundancies and potential cost savings that could be realized through implementing a shared services model and/or consolidation of certain administrative and operational functions. The Commissions mutually seek to identify costs savings and improvements to service delivery to maximize investments in the Commissions' trust resources, achieve efficiencies that benefit customers and staff, and preserve independent and specialized board governance.

The vendor should provide a full range of professional consultative services to gather relevant and necessary information to conduct the analysis described above. Services may include research into other organizations' structures; analysis of administrative, financial, operational, and programmatic functions; analysis of personnel reports; and other consultant services as identified by the Commissions. Organizational charts, functional statements, annual reports, financial reports, strategic plans, and other resources necessary to conduct this analysis will be provided by each Commission.

Deliverables
The vendor shall conduct the required analysis and produce a report on specific redundancies, overlapping functions, and potential cost savings. The report should also include a list of actionable proposed recommendations that meet the goals of this Statement of Work.

Appendix C. Stakeholder Engagement Methods and Findings

Methods

Between February and March 2026, WMI collected qualitative information from the workforce and the governing bodies of both commissions using two instruments. First, an agency-wide SWOT survey invited all employees of PGC and PFBC to identify strengths, weaknesses, opportunities, and threats within their own agency. Participation was approximately 64% of the combined workforce and produced 3,123 individual responses (Appendix C, Table 12). Second, WMI conducted 45 semi-structured interviews with PGC senior staff and regional directors, PFBC senior staff, and members of the PFBC Board of Commissioners and Boating Advisory Board. Interview records were anonymized and consolidated into three synopses. Survey responses and interview statements were then evaluated against the six evaluation objectives established in the Statement of Work (Appendix B). Responses addressing internal matters not responsive to those objectives were recorded but are not reported here. Findings from both instruments are summarized below.

Table 12. Participation in the SWOT survey and the senior staff and board interviews, February and March 2026.

Commission	Instrument	Participation
PGC	Agency-wide SWOT survey	584 respondents
PFBC	Agency-wide SWOT survey	245 respondents
PGC	Senior staff and regional directors	20 interviews
PFBC	Senior staff	15 interviews
PFBC	Board of Commissioners and Boating Advisory Board	10 interviews
Total	**All instruments**	**829 SWOT respondents; 45 interviews**

Findings

Table 13 summarizes the findings from both instruments that may bear directly or indirectly on the six evaluation objectives.

Table 13. SWOT survey and interview findings.

Finding
Staff at both commissions independently identified declining license-buying participation as the primary long-term revenue threat. PGC cited an aging hunter base; PFBC cited an aging angler base compounded by warming water temperatures affecting trout stocking.

Table 13. SWOT survey and interview findings.

Finding
PGC senior staff described oil and gas royalty revenue as volatile and advocated a trust fund model to stabilize long-term income.
PFBC hatchery operations consume approximately 48% of operating expenses, and PFBC is managing roughly $155 million in concurrent capital work across hatcheries and 33 to 34 high-hazard dams.
Staff and commissioners at both agencies stated that statutory separation of the Game Fund and the Fish Fund is a precondition for any consolidation legislation to pass.
Shared administrative services covering human resources, information technology, legal, finance, and purchasing were identified by staff at both commissions as the lowest-risk and highest-return consolidation target.
HuntFishPA, the licensing platform operated jointly with Tyler Technologies, already functions across both commissions and was cited by staff at both as evidence that cross-agency systems integration is workable.
Unified law enforcement was the most strongly and consistently supported consolidation opportunity in the qualitative record, endorsed in all ten board interviews and identified as the highest-value target by senior staff at both commissions.
Staff at both commissions agreed that the volunteer deputy program is outdated and creates liability exposure, including the absence of random drug testing for volunteer officers.
Officers at both commissions are routinely diverted to non-enforcement duties, including trout stocking logistics at PFBC and carcass removal at PGC.
The two asset portfolios are largely complementary rather than duplicative. PGC holds terrestrial habitat and management infrastructure; PFBC holds aquatic production, access, and easement infrastructure.
Reduced office occupancy following the adoption of remote work has prompted internal discussion at PFBC of shared desks, offices, and regional space with PGC.
Consolidating maintenance staffing across adjacent counties was proposed to reduce travel time and improve upkeep of boat access sites, lakes, and game lands.
The public does not reliably distinguish among PGC, PFBC, and DCNR, and some constituents seek services from one commission at the other commission office.
PFBC staff questioned the financial viability of the printed magazine and identified consolidation of publications as a natural efficiency. Board members cited Maryland Outdoors as a working model of integrated fish and game messaging.
Each commission operates flagship education programs with no counterpart at the other, including PGC Hunter and Trapper Education and PFBC Trout in the Classroom and boating safety instruction.
A strong majority of commissioners emphasized retaining two boards or specialized subcommittees.
Federal excise tax allocation restrictions under the Pittman-Robertson and Dingell-Johnson acts were identified by both staff and commissioners as a binding constraint on cross-agency fund use.

Table 13. SWOT survey and interview findings.

Finding
Resistance to change was the most universally cited obstacle in the record. Both workforces expressed concern about loss of institutional identity, and both stated a preference for voluntary collaboration over a legislatively imposed merger.

Limitations

Responses represent perceptions, opinions, and sometimes fears of staff members. WMI did not attempt to independently validate the conclusions reached. Two additional limitations apply: 1) SWOT participation was voluntary and reached approximately 60% of the combined workforce, so the results describe the views of participating staff rather than a representative sample, and 2) Interviews were conducted with senior staff and board members, and do not capture field-level perspectives except as those are reflected in the SWOT responses.