

## **Designation of Allocated Tags in Uncapped/Newly Capped Elk Zones & General Deer Hunts**

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### **Summary of Subcommittee Recommendations**

The Board-appointed Subcommittee on the Designation of Allocated Tags reviewed the Board Staff's compilation of data of what was reported on the R-5 use report and what was reported from the December 2020 survey regarding 2018 and 2019 use (if any) for all big game outfitters. This compilation is in the Board packet. Based on its review, the Subcommittee makes the following recommendations.

#### **Determination of Outfitted Tag Use History for Individual Outfitters:**

##### Survey Information

The Subcommittee recommends accepting and using the data from the December 2020 survey regarding 2018 and 2019 use ("survey use data") where the survey showed:

- Discrepancy of one (1) tag or less;
- Survey data is lower than the use report data; and
- Where the hunter total did not change (e.g. the white-tailed deer and regular deer tag numbers were shifted, but the total of deer tags did not change or did not change beyond one (1) tag).

The Subcommittee also recommends the Board require verification of outfitted hunter tag use for a hunt for all other circumstances before accepting survey use data, pursuant to Section 057.02 of the Board's rules.

In the circumstance where an outfitter's survey data is acceptable (based on the criteria above) for an elk hunt but not a deer hunt(s), only the deer hunt(s) needs to be verified and the survey data can be accepted for the elk, and vice versa. This will allow the Board to move forward with designations of allocated tags for some hunts for all outfitters in the hunt when there is little concern about the data.

##### Verification

Section 057.02 states that outfitted tag use history is "subject to verification by document or other reliable information acceptable to the Board showing the outfitter provided outfitting services to the hunter using the tag." IDAPA 24.35.01.057.02. For outfitters who are required to verify their use the recommendation is as follows:

- Verify use with the following documentation with one of the following and in the preferred order:
  1. Hunter name, license number, and tag number; or

2. Outfitter-Client Service Agreements, and the Outfitter may redact any information about pricing.

- Use a short turnaround for producing the verifying information so that calculations are not delayed for other outfitters in the hunt.
- If the outfitter does not produce the verifying information, use the lower use report numbers.
- Proceed with the verified information for calculations. The verified information may be further cross-checked or investigated. If later investigation shows that the verified information was incorrect/misrepresented/false, it can be referred for potential disciplinary action.

### No Survey Information

For outfitters who did not timely complete the survey, the Subcommittee recommends using the data from the R-5 use reports as submitted, except where the data cannot be reasonably reconciled based on known information from the Board or IDFG and/or the data is not distinguishable by tag or hunt. For those instances, the Subcommittee recommends the Board require verification of outfitted hunter tag use, as set forth above.

In the event, an outfitter who did not timely complete the survey does not respond to the request for verification, the best determination of use will be based upon the other data that is available that indicated the R-5 use information was unreconcilable. The outfitter will be notified about what numbers will be used if the outfitter does not respond with verification.

### Individual Requests

The Subcommittee recommends denying requests to use an outfitter's 2019/2020 use numbers rather than 2018/2019 data. The Commission's decisions were already based on the higher of the two years of use, so the higher 2019 use numbers are accounted for in the IFGC allocation. Such a request would also potentially double-count 2020 data when the next designation cycle comes around, and the subcommittee is hesitant to start mixing in 2020 data. The Subcommittee does not feel that using 2018 and 2019 use is unreasonable, particularly given the above considerations.

### January 2021 Elk Tags Allocated by the Commission

The Idaho Fish and Game Commission allocated 348 additional elk tags at its January 28, 2021 meeting. The Subcommittee recommends the Board use the 2018/2019 use data to designate those allocated tags because they came from the reported use from 2018/2019, is a continuation of the November 2020 Commission action regarding non-resident tag

limits, and pertain to the tags that went on sale on December 1, 2020. Also, all allocated elk tags resulting from the 2020 non-resident tag limits are designated on the same basis with a single calculation.

### **Designations**

The Subcommittee recommends the Board proceed with the designation of allocated tags for elk, and in particular in hunts where there are no use history discrepancies requiring verification. Deer Tags, to be dealt with second, as verification is anticipated to take longer. The Subcommittee further recommends that deer tag designation can occur on a hunt-by-hunt basis; addressing hunts that do not need verification first.

### **Continuation of Subcommittee**

The Subcommittee and Board Staff request the Board authorize the Subcommittee to continue to work to address outfitted hunter tag use issues as it pertains to verifying use and determining what use information is not able to verified or reconciled and a determination of the use that should be used on a case-by-case basis. The Subcommittee also could examine the data for deer hunts to prepare a recommendation for the Board to give to the IDFG regarding which units could be prioritized for additional allocation of deer tags should the Commission allocate additional deer tags at a future time.