



26 May 2023

Swan Hunt Recommendations for 2023  
C/O Utah Division of Wildlife Resources  
Main Office  
Box 146301  
Salt Lake City, UT 84114-6301

**Re: Swan Hunt Recommendations for 2023**

Dear Wildlife Board Members and Director Shirley:

On behalf of Safari Club International, I would like to thank you for the opportunity to comment on the Swan Hunt Recommendations for 2023.

As you know, the Swan Hunt Recommendations for 2023 propose closing incidental harvest of trumpeter swans during the swan season and removing the mortality quota for trumpeter swans, thereby making it illegal to take a trumpeter swan. It has been analogized that because ducks require identification when hunting, it isn't implausible that swans should too be identified by hunters. SCI would submit that swan identification is inherently many, many times more difficult on the wing for an average hunter than duck identification and perhaps likely impossible should an individual bird appear in isolation. It has been stated that ten percent of all adult tundra swans do not have yellow on the lores so even that is not a definitive identification marker. Even cranes (whooping and sandhill), where the species overlap and hunting seasons occur, have many different identification markers that allow hunters to distinguish between species. As such and while balancing the Division's rationale for the proposed change, SCI raises concerns about the potential for future enforcement actions against hunters, particularly in light of conversations nationally about potentially heading towards a swan season encompassing both species as trumpeter swans continue to expand in population and range, and encourages the Division to take a light handed approach as the transition to a tundra swan only season occurs.

SCI believes that sound science-based conservation involving hunting as the primary management tool, while maximizing opportunities for all huntable species, is necessary to the long-term health of wildlife. Hunters have long paid the way for conservation, both game and non-game wildlife, and maximizing opportunity for hunting is also key to long-term funding for all conservation. Hunting benefits wildlife conservation.



Thank you again for the opportunity to comment on the Swan Hunt Recommendations. SCI is dedicated to protecting the freedom to hunt and we appreciate the continued partnership with the Division and the Wildlife Board. SCI is always first for hunters!

Sincerely,

A handwritten signature in black ink that reads "Sven K. Lindquist". The signature is written in a cursive style with a large, sweeping initial "S".

Sven Lindquist  
President  
Safari Club International