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The Unified Voice of Agribusiness

May 20, 2015

Virginia Department of Game and Inland Fisheries
Attn. Policy Analyst and Regulatory Coordinator
P.O. Box 90778
Henrico, VA 23228

To Whom It May Concern:

Thank you for the opportunity to submit written comments regarding the Department of Game and Inland Fisheries (DGIF) proposed expansion of the elk protection area from the current three-county area in Southwest Virginia to all counties west of the Blue Ridge Mountains. The Virginia Agribusiness Council represents around 40,000 farmers and agribusinesses around the Commonwealth, and agriculture, which is Virginia's largest private sector industry, generates over \$50 billion in economic activity per year.

After reviewing this proposal and discussing the issue with our membership, we urge DGIF to not move forward with the proposed amendment. We have historically opposed the reintroduction of elk in Virginia, and as we stated in 2010, we continue to believe that this proposal over time will have severe statewide implications. Specifically, we raise the following points in opposition of the proposal to further reintroduce elk into Virginia.

Further Migration of the Species

In effect, DGIF would be allowing and encouraging migration of the species into additional counties in western Virginia, including several key cattle and crop producing localities. As the migration into additional counties and agricultural areas occurs the potential for disease transmission and property damage increases significantly.

Damage to Agribusinesses

Adding a new species into additional localities (and others as further migration takes place) will significantly increase the threat of damage to crops, fences, and property for area agribusinesses. The production of fruit, fruit trees, vegetables, crops, and pasture utilized by livestock operations will likely be impacted by elk that either consume the crops or damage the property. The damages incurred by these producers is more than a wildlife "nuisance." It is a loss of productivity and income. We are concerned that the proposed plan provides no detail for addressing crop damages or compensation when damages occur. Current efforts to address damages to crops and livestock from wildlife are not satisfactory. We question why the state should encourage the introduction of another species that results in additional damages for producers to incur.

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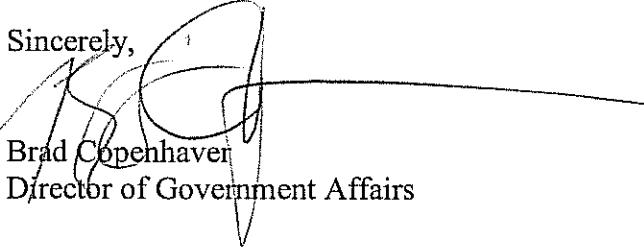
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Disease Transmission

We remain extremely concerned about the potential impact of disease transmission from the introduced herd to domestic livestock. Diseases such as Bovine Tuberculosis and Brucellosis, to name a few, will not only impact those producers whose animals are infected, but also the ability of other producers statewide to market and sell their products. The Commonwealth and the cattle industry have cooperated over decades to establish a Tuberculosis and Brucellosis-free status. Potential introduction of this disease from elk, and the potential loss of this "free" status would be detrimental to our cattle markets and producers who sell their animals across state lines. Further, as is the case with other damages caused by elk, there is no specific indemnification plan or program outlined in the proposal to address disease transmission and its impacts on the livestock industry.

In conclusion, the Virginia Agribusiness Council cannot support this proposal that has such great risks and impacts to the agribusiness industry. Further thought must be given to planning for damages and indemnification, and specific solutions outlined to the issues raised by the industry most impacted by this proposal. We appreciate this opportunity to comment and look forward to working with you to address these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Copenhaver', is written over a horizontal line. The signature is stylized and extends across the line.

Brad Copenhaver
Director of Government Affairs