

Mr. Craig Martin, Chief
Branch of Aquatic Invasive Species
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041

Mr. Martin,

My name is Casey LeFever. I am the owner of Next Day Koi, Inc. As one of the largest online koi dealers in the U.S., Next Day Koi currently employs 9 individuals full-time.

I am writing to you today to express my absolute opposition to the proposed addition of *Cyprinus carpio*, aka common carp or “koi”, to the Injurious Wildlife listing. This action was proposed in a petition submitted to U.S. Fish and Wildlife by the Center for Injurious Species Prevention on September 23, 2016. The petitioner’s filing is based upon the erroneous and publically stated conclusion by the FWS that koi represent a “high risk” for injury to human beings, agriculture, horticulture, forestry, or wildlife and wildlife resources in the United States.

Koi keeping is a very important part of the pet industry, both in the U.S. and abroad. The hybridization of common carp to produce koi began in the 1820s among Japanese hobbyists. Koi were first introduced to the world during a 1914 exposition in Tokyo, and the koi hobby quickly spread across the globe. My grandfather, Wyatt LeFever, was quite possibly the first individual to import Koi into the U.S. He began breeding the koi he had imported, starting what is today known as Blue Ridge Fish Hatchery, the largest and longest running koi farm in the U.S., in business for more than 50 years.

Thousands of families and individuals across the U.S. enjoy Koi currently. Next Day Koi alone has a customer list over 10,000 names long, and we are just one of many dealers in the U.S. industry. People across the U.S. appreciate the beauty and variety of koi, while enjoying

the relaxing and creative hobby of creating and maintaining water features. Most keepers value their koi just as much as one would value a dog, cat, or other pet, considering them a part of the family.

I believe this action should be opposed based on the following factors:

1. **Negative Economic Impact** – According to the 2013 USDA Census of Aquaculture for 2013, koi farms in the U.S. accounted for nearly \$7,000,000 of revenue. Addition of common carp, or koi, to the Injurious Wildlife listing would essentially eliminate this industry overnight, instantly eliminating this \$7,000,000 from our economy.

However, the \$7,000,000 listed in the USDA census is only a small part of the overall figure, **as it only accounts for revenue from actual production farms**. This figure **does not** account for revenue from wholesalers and dealers, as well as omits revenue from supporting industries. These supporting industries include manufacturers of food, pond liners, filters, pumps, and many other accessories associated with the koi and water gardening industry.

All told, the koi industry adds tens of millions of dollars to our national economy each year. Adding common carp to the Injurious Wildlife listing would eliminate this industry, at a time when our country and economy can hardly afford to lose revenue and jobs.

2. **Ineffectiveness** – The U.S. Fish Commission, precursor to U.S. Fish and Wildlife Service, distributed common carp to any and all interested parties and stocked public waterways starting in 1877. Common carp have been documented in all 50 states of the U.S., most for more than 100 years. They are very well established in waterways across the entire United States.

Myself, nor anyone else involved in this issue, has seen **any** proposal or plan to remove the common carp populations that already exist in our natural waterways. Considering how well established common carp are in all natural waterways, one struggles to imagine what a feasible plan for removal and eradication would even look like.

Adding common carp to the Injurious Wildlife listing, as a result of the ill-considered ranking by the FWS of koi as “high-risk”, will do nothing to stop or even reduce the populations of common carp in our waterways. Addition to the list would eliminate a hobby that is valued by people throughout the United States and the businesses that support the hobby, with no tangible gain to our natural resources.

3. **Prevention** – Myself, along with other business owners and vested parties in the industry, are committed to increasing environmental education and knowledge amongst koi and water gardening hobbyists. Through these programs we will educate hobbyists on becoming responsible environmental stewards, while still enjoying the hobby that they love.

We are still in the early stages of development with this, but some of our methods include:

- a. Blog articles and direct emails to our mailing lists that provide alternatives and suggestions to the very few hobbyists that might consider release, as well as practical ideas to prevent escape.
- b. My company will soon begin including an insert into each shipment of fish that we send out, educating customers on how to act as responsible koi keepers and positive stewards of the environment.

c. We are in the process of developing a “Koi Keepers Promise” page on our website. This page will ask people to “promise” to prevent release into natural waterways, as well as provide multiple alternatives to release. Customers and hobbyists will be able to digitally sign the page, pledging their dedication to reducing and eliminating the release of koi or common carp into natural waterways. The page will display a list of those who have signed the promise, as well as a count of the total number signees.

4. Inaccuracy – The belief that koi are injurious wildlife is inaccurate. The [USGS NAS database common carp fact sheet](#) reports that “only a small percentage of common carp records in the U.S. open waters are based on koi”. This would seem to indicate that, because of their very bright and attractive coloration, the few koi that do manage to escape into natural waters do not survive, as they are quickly eliminated by predators.

Myself and my colleagues in the koi industry take this matter very seriously. We are committed to fighting addition to the Injurious Wildlife listing and saving the businesses that we love, and that we have worked for so long to build. I welcome any feedback or questions that you may have for me.

Sincerely,
Casey LeFever
President
Next Day Koi, Inc.