

DOCKETED

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Shaping the future for birds

January 28, 2014

The Honorable Sally Jewell
Secretary
U.S. Department of the Interior
Washington, D.C. 20240

Dear Secretary Jewell,

On behalf of the undersigned conservation organizations, we urge swift action to address the threat to wildlife populations and human health posed by feral cats.

In the past year, a series of new scientific studies have been published documenting extensive wildlife mortality resulting from cat predation, growing risk to human health from rabies and toxoplasmosis spread by cats, and the ineffectiveness of trap, neuter, release (TNR) programs at stemming cat populations. As Secretary, you are in a position to direct action to conserve wildlife and to adopt land management policies that will ensure public lands are not degraded by the presence of cat colonies.

This issue was raised with the Department in an attached [April 12, 2011, letter to Secretary Ken Salazar](#). To date, while discussions with Department of the Interior or U.S. Fish and Wildlife Service (FWS) staff have taken place, no meaningful actions needed to address this problem have been taken by the Department.

As the Smithsonian Institution and FWS have found, there is great urgency due to the high mortality wildlife populations face. A peer-reviewed study by scientists from these two organizations estimated that approximately 2.4 billion birds and 12.3 billion mammals are killed in the United States by cats every year.¹ While both owned and un-owned cats contribute, un-owned (e.g., feral) cats are responsible for over two-thirds of these bird deaths and nearly 90 percent of mammal deaths. Cats are now the number one source of direct anthropogenic mortality for birds and mammals, and their impact on wildlife will only increase as the numbers of cats – which have tripled in the last 40 years – continue to rise.^{1,2}

¹ Loss S. R., T. Will, and P. P. Marra. 2013. The impact of free-ranging domestic cats on wildlife of the United States. *Nature Communications* 4:1396.

² Lepczyk C. A., N. Dauphiné, D. M. Bird, S. Conant, R. J. Cooper, D. C. Duffy, P. J. Hatley, P. P. Marra, E. Stone, and S. A. Temple. 2010. What conservation biologists can do to counter trap-neuter-return: response to Longcore et al. *Conservation Biology* 24: 627-629.

Most recently, the Centers for Disease Control and Prevention (CDC) has determined that feral cat colonies pose a threat to human health. According to the CDC, cats are consistently the number one carrier of rabies among domestic animals and disproportionately pose a risk of human exposure to rabies because of the increased likelihood of human-cat interactions.^{3,4} A recently published study led by CDC scientists stated, “The propensity to underestimate rabies risk from cats has led to multiple large-scale rabies exposures.”³ Continued tolerance for roaming feral cats is, according to the Florida Department of Health, “not tenable on public health grounds because of the persistent threat posed to communities.”⁵

Toxoplasmosis also threatens the health and welfare of people and wildlife. This disease is caused by a parasitic protozoan that depends on cats to complete its life cycle. Up to 74 percent of all cats will host the toxoplasmosis-causing parasite in their lifetime and shed hundreds of millions of infectious eggs as a result.⁶ Any contact, either directly or indirectly, with cat feces risks human and wildlife health. In humans the parasite often encysts within the brain, which may cause behavioral changes and has been linked to schizophrenia, Alzheimer’s, and other neuro-inflammatory diseases.⁷ Pregnant women may suffer sudden abortion or fetal developmental defects (e.g., blindness).⁶ Wildlife are similarly at risk, and contamination of watersheds with infected cat feces has been linked to the deaths of a number of freshwater and marine species (e.g., otters, Hawaiian monk seals).^{8,9,10}

TNR programs fail to reduce cat populations and cannot be relied upon as a management tool to remove cat colonies or protect people and wildlife. Multiple peer-reviewed studies, including the CDC’s, have found that TNR programs do not adequately reduce feral cat populations or effectively mitigate health concerns.^{4,11,12} TNR colonies may actually lead to increased numbers

³ Blanton J. D., J. Dyer, J. McBrayer, C. E. Rupprecht. 2012. Rabies surveillance in the United States during 2011. *Journal of the American Veterinary Medical Association* 241: 712-722.

⁴ Roebing A. D., D. Johnson, J. D. Blanton, M. Levin, D. Slate, G. Fenwick, and C. E. Rupprecht. 2013. Rabies prevention and management of cats in the context of Trap-Neuter-Vaccinate-Release programmes. *Zoonoses and Public Health* doi: 10.1111/zph.12070.

⁵ Florida Department of Health. 2013. Rabies prevention and control in Florida, 2013. Florida Department of Health, Tallahassee, <http://www.floridahealth.gov/chdPasco/publications/Rabies/RabiesGuide2013Final.pdf>.

⁶ Tenter A. M., A. R. Heckerroth, and L. M. Weiss. 2000. *Toxoplasma gondii*: from animals to humans. *International Journal for Parasitology* 30: 1217-1258.

⁷ Webster J. P., M. Kaushik, G. C. Bristow, and G. A. McConkey. 2013. *Toxoplasma gondii* infection, from predation to schizophrenia: can animal behavior help us understand human behavior? *The Journal of Experimental Biology* 216: 99-112.

⁸ Kreuder C., M. A. Miller, D. A. Jessup, L. J. Lowenstine, M. D. Harris, J. A. Ames, T. E. Carpenter, P. A. Conrad, and J. A. K. Mazet. 2003. Patterns of mortality in southern sea otters (*Enhydra lutris nereis*) from 1998-2001. *Journal of Wildlife Diseases* 39: 495-509.

⁹ Conrad P. A., M. A. Miller, C. Kreuder, E. R. James, J. Mazet, H. Dabritz, D. A. Jessup, F. Gulland, and M. E. Grigg. 2005. Transmission of *Toxoplasma*: clues from the study of sea otters as sentinels of *Toxoplasma gondii* flow into the marine environment. *International Journal for Parasitology* 35: 1155-1168.

¹⁰ Honnold S. P., R. Braun, D. P. Scott, C. Sreekumar, and J. P. Dubey. 2005. Toxoplasmosis in a Hawaiiina monk seal (*Monachus schauinslandi*). *Journal of Parasitology* 91: 697-699.

¹¹ Castillo D. and A. L. Clarke. 2003. Trap/Neuter/Release methods ineffective in controlling domestic cat “colonies” on public lands. *Natural Areas Journal* 23: 247-253.

of cats.^{11, 12} One long-term study of TNR in Rome, Italy, went so far as to call TNR a “waste of money, time, and energy.”¹² The only sure way to simultaneously protect wildlife and people is to remove feral cats from the landscape.

Cat colonies are a common problem on many federal lands managed by the Department of the Interior. We urge that each agency develop a clear policy for the removal of cat colonies on the federal lands they are responsible for stewarding.

Sincerely,

Accipiter Enterprises, Educational Birds of Prey
Alaska Wild Animal Recovery Effort Inc.
Allamakee County Protectors
Allegheny Highlands Alliance
Alliance for the Wild Rockies
American Bird Conservancy
American Birding Association
American River Parkway Foundation
Anne Arundel Bird Club
Audubon Minnesota
Audubon Naturalist Society
Audubon Society of Kalamazoo
Audubon Society of New Hampshire
Audubon Society of Northern Virginia
Audubon Society of Rhode Island
Bexar Audubon Society
Bird Ally X
Bird City Wisconsin
Bird Conservation Network
Black River Audubon Society
Black Swamp Bird Observatory
Bridgerland Audubon Society
Central New Mexico Audubon Society
Central Valley Bird Club
Centre Wildlife Care
Chesapeake Audubon Society
Chicago Audubon Society
Chicago Bird Collision Monitors
Chicago Ornithological Society
Citizens Committee to Complete the Refuge

¹² Natoli E., L. Maragliano, G. Cariola, A. Faini, R. Bonnani, S. Cafazzo, and C. Fantini. 2006. Management of feral domestic cats in the urban environment of Rome (Italy). *Preventive Veterinary Medicine* 77: 180-185.

Clearwater Audubon Society
Coastal Bend Audubon Society
Coastal Virginia Wildlife Observatory
Colorado Wild Rabbit Foundation
Connecticut Audubon Society
Cornell Lab of Ornithology
Coulee Region Audubon Society
Delmarva Ornithological Society
Department of Fisheries and Wildlife, Oregon State University
Desert Rivers Audubon Society
Detroit Audubon Society
Eastern Long Island Audubon Society
Elisha Mitchell Audubon Society
Endangered Habitats League
Environmental Protection Information Center (EPIC)
Evergreen Audubon
Five Valleys Audubon Society
Flathead Audubon
Florida Keys Hawkwatch
Florida Wildlife Federation
Foothills Audubon Club
Freedom Center for Wildlife Inc.
Friends of Atascadero Wetlands
Friends of Beautiful Pendleton County
Friends of Dyke Marsh
Friends of the Kalmiopsis
Friends of the Tampa Bay National Wildlife Refuges
Georgia Important Bird Areas Conservation Program
Georgia Ornithological Society
Geos Institute
Golden Eagle Audubon Society
Grand Valley Audubon Society
Great South Bay Audubon Society
Greater Ozarks Audubon Society
Greater Wyoming Valley Audubon Society
High Country Audubon Society
Hilton Pond Center for Piedmont Natural History
Hope Valley Audubon Society
Houston Audubon
Howard County Bird Club
Hoy Audubon Society
Huntington-Oyster Bay Audubon Society
Idaho Conservation League
Illinois Audubon Society

Illinois Ornithological Society
Ivy Creek Natural Area
John Burroughs Natural History Society
Juniata Valley Audubon Society
Kalmiopsis Audubon Society
Kansas Wildlife Federation
Kerncrest Audubon Society
Kettle Range Conservation Group
Kissimmee Valley Audubon Society
Klamath Forest Alliance
Lab of Avian Biology – University of Maine
Lahontan Audubon Society
Lake County Audubon Society
Lake-Cook Audubon
Lane County Audubon
Lehigh Valley Audubon Society
Lindsay Wildlife Museum
Los Angeles Audubon Society
Madison Audubon Society
Madrone Audubon Society
Magic
Manistee Audubon
Maricopa Audubon Society
Maryland Ornithological Society
Maryland/Delaware Chapter of The Wildlife Society
Mid-Coast Audubon Society
Minnesota Chapter of The Wildlife Society
Minnesota Herpetological Society
Minnesota River Valley Audubon Chapter
Monmouth County Audubon Society
Montana Audubon
Montana Falconers Association
Montana Fish, Wildlife, and Parks
Montgomery Friends of Open Space
Mt. Diablo Audubon Society
Native Songbird Care & Conservation
Natural History Museum of Los Angeles County
New Hampshire Audubon
New Jersey Association of Wildlife Rehabilitators
New Jersey Audubon
New York City Audubon Society
New York State Wildlife Rehabilitation Council
North Carolina Chapter of The Wildlife Society
North Dakota Birding Society

Northern Flint Hills Audubon Society
Oconee Rivers Audubon Society
Ohlone Audubon Society
On A Wing And A Prayer
Otter Creek Audubon Society
Pamela Jo Hatley Professional Association
People for the Ethical Treatment of Animals
Peregrine Audubon Society
Pomona Valley Audubon Society
Progressive Democrats, Sonoma County
Queens County Bird Club Inc.
Quick Reference Publishing
Rainforest Biodiversity Group
Ralph T. Waterman Bird Club
Redbud Avian Rehabilitation Center, Inc.
Redwood Region Audubon Society
Robert Cooper Audubon Society
Sacramento Audubon Society
Salem Audubon Society
San Diego Audubon Society
San Francisco Bay Joint Venture non-federal partners
Sangre de Cristo Audubon Society
Santa Barbara Audubon Society
Santa Clara Valley Audubon Society
Sassafras Audubon Society
Save Our Allegheny Ridges
Save Our Cabinets
Saving Birds Thru Habitat
Seattle Audubon Society
Sequoia Audubon Society
Shadow Oaks Wildlife Care
Skagit Audubon Society
Soda Mountain Wilderness Council
SoHo Dogs Inc.
Songbird Care and Education Center
South Bend-Elkhart Audubon Society
South Florida Audubon Society
Southeastern Arizona Bird Observatory
Southern Adirondack Audubon Society
Southwestern New Mexico Audubon Society
St. Louis Audubon Society
St. Lucie Audubon Society
Stockbridge Audubon Society
Tampa Audubon Society

Tennessee Chapter of Sierra Club
Tennessee Ornithological Society
The Biodiversity Group
The Institute for Bird Populations
The Nature Conservancy - Kentucky Field Office
The Rural Alliance
The Trumpeter Swan Society
The Wildlife Center of Virginia
Tippecanoe Audubon Society
Virginia Beach SPCA Wildlife Program
Virginia Bluebird Society
Virginia Society of Ornithology
Wabash Valley Audubon Society
Warioto Audubon Society
Weeden Foundation
Western Nebraska Resources Council
Whitescarver Natural Resources Management LLC
Wild Utah Project
Wildbird Recovery
Wildlife Care Alliance
Wildlife Care Association
Wildlife Center of Silicon Valley
Wildlife Emergency Services
Wildlife Rehabilitation and Release
Wildlife Research and Consulting Services LLC
Will County Audubon Society
Winnebago Audubon Society
Wisconsin Audubon Council
Wisconsin Society for Ornithology
World Safaris/Safari Professionals
Wyncote Audubon Society
Yellowstone to Uintas Connection
Yellowstone Valley Audubon Society
York Audubon Society
Yosemite Area Audubon Society
Youth Environmental Alliance
Zumbro Valley Audubon Society