Society for Conservation Biology
The Wildlife Society

January 7, 2014

Secretary Sally Jewell
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Secretary Jewell:

On behalf of the Wildlife Society and the Society for Conservation Biology, we are writing today to bring to your attention the threat being posed to wildlife by feral cats. In a 2012 letter to former Secretary Salazar, The Wildlife Society and several other organizations expressed concern about the effects of trap/neuter/release (TNR) as the accepted method of feral cat control, because of the serious harm it poses to native wildlife and potential negative effects on human health. The problem is ongoing, as colonies of feral cats overrun Department of Interior (DOI) land, degrade habitat, and kill native wildlife. We ask for a clear, comprehensive management plan that will protect public land and wildlife from feral cats.

The Wildlife Society was founded in 1937 and is a non-profit scientific and educational association representing nearly 11,000 professional wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to represent and serve the professional community of scientists, managers, educators, technicians, planners, and others who work actively to study, manage, and conserve wildlife and habitats worldwide.

The Society for Conservation Biology is an international professional organization dedicated to promoting the scientific study of biological diversity. The Society's membership comprises a wide range of professionals interested in the conservation and study of biological diversity: resource managers, educators, government and private conservation workers, and students make up the more than 5,000 members worldwide.

Our societies jointly note that feral and free-ranging domestic cats are exotic species to the United States. Exotic species are recognized as one of the most widespread and serious threats to the integrity of native wildlife populations and natural ecosystems.[1] Results from a study conducted by the Smithsonian Conservation Biology Institute and U.S. Fish and Wildlife Service suggest that feral cats kill 1.4-3.7 billion birds and 6.9-20.7 billion mammals every year in the U.S.[2] Because free-ranging cats often receive food from humans, they can reach population

[1] Baker, P.J., S.E. Molony, E.Stone, I.C. Cuthill, and S. Harris. 2008. Cats about town: is predation by free-ranging pet cats *Felis catus* likely to affect urban bird populations? Ibis 150 (Suppl.1):86-99.
[2] 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

levels that create areas of abnormally high predation rates on wildlife. Studies show that even well fed cats continue to hunt and kill small mammals, birds, reptiles, and insects.[3]

Feral cats are an invasive problem on many Department of Interior (DOI) lands. For example, in the Florida Keys, the native wildlife on the islands is subject to heavy predation by cats, which potentially can lead to population declines or even extinctions.[4] The same report by Medina et al. (2011), shows that "feral cats on islands have contributed to 33 (13.9%) of the 238 global bird, mammal and reptile extinctions reported by the IUCN red list." Feral cats are known to hunt federally listed species in the Florida Keys National Wildlife Refuges such as the Lower Keys marsh rabbit (*Sylvilagus palustris hefneri*), Key Largo woodrat (*Neotoma floridana smalli*) and the Key Largo cotton mouse (*Peromyscus gossypinus allapaticola*). [5] At present, control methods for invasive feral cats on the refuges include removal by the U.S. Fish & Wildlife Service through live trapping, transferring the cats to animal control shelters, and "under no circumstances will cats be allowed to be re-released on or near Refuge lands in the Florida Keys national wildlife refuges."[6]

Feral cats pose a significant threat to endangered and threatened species, as well as overall biodiversity. Hawaii contains more endangered/threatened plant and animal species per square mile than elsewhere in the world, and feral cats that are found throughout the islands have detrimental impacts on these vulnerable species. DOI lands such as Haleakala National Park and Kealia Pond National Wildlife Refuge have feral cats that kill native wildlife. Feral cats have no native predators in Hawaii and are able to reproduce year-round due to the mild weather. Federally endangered species such as the Palila (a Hawaiian honeycreeper), the Hawaiian Petrel, Newell's Shearwater, Hawaiian Goose, Hawaiian Coot, Hawaiian Duck, Hawaiian Moorhen and Hawaiian Stilt all face population declines due to feral cat predation. [7] Hawaii maintains a low-cost spay/neuter program, and a TNR program, but still euthanizes thousands of cats every year, including more than 11,000 cats a year on Oahu alone.[8]

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[3] 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.

[4] Medina, F.M., Bonnaud, E., Vidal, E., Tershy, B.R., Zavaleta, E.S., Donlan, C., Keitt, B.S., Le Coree, M., Horwarth, S.V. and Nogales, M. 2011. A global review of the impacts of invasive cats on island endangered vertebrates. Global Change Biology 17: 3503-3510.

[5] Winchester, C., SB Castleberry, MT Mengak. 2009. Evaluation of factors restricting distribution of the endangered Key Largo woodrat. Journal of Wildlife Management 73(3):374-379.

[6] U.S. Fish and Wildlife Service. Florida Keys National Wildlife Refuges Complex: Integrated pest management plan. December 2012.

[7] Mitchell, C., C. Ogura, D.W. Meadows, A. Kane, L. Strommer, S. Fretz, D. Leonard, and A. McClung. 2005. Hawaii's Comprehensive Wildlife Conservation Strategy. Dept. of Land and Natural Resources. Honolulu, HI. 722 pp. http://www.state.hi.us/dlnr/dofaw/cwcs/process_strategy.htm.

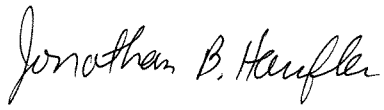
[8] Hawaiian Humane Society. http://www.hawaiianhumane.org

TNR programs have proven to be unsuccessful in controlling predation by feral cats, because they do not eliminate feral cat colonies. In fact, TNR can increase the carrying capacity of feral cat colonies through supplemental feeding by humans, and populations can grow to densities more than 10-100 times those of native predators.[9] Behavioral changes that spayed and neutered cats go through often attract stray cats, further increasing the colony size.[10]

The science clearly shows that feral cats can be damaging to ecosystems, especially in unnaturally high numbers created by human-managed colonies. TNR fails to adequately control predation by feral cats, because it does not eradicate feral cat populations. We strongly encourage you to oppose TNR programs on DOI lands, and create a management plan more effective for dealing with feral cats. Due to the documented limitations of TNR in alleviating feral cat impacts on threatened and endangered species, and the current lack of comprehensive and consistent guidelines for feral cat management on DOI lands, we request that a department-wide policy implements a swift action plan to eradicate feral cats on lands managed by the DOI.

Thank you for considering the views of wildlife and conservation professionals.

Sincerely,



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[9] Liberg O., M. Sandell, D. Pontier, and E. Natoli, 2000. Density, spatial organization and reproductive tactics in the domestic cat and other felids. Pages 119-147 *in* D.C. Turner and P. Bateson, eds. The Domestic cat: the biology of its behavior. Cambridge University Press.

[10] 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.