

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 <u>April 12, 2011, letter to Secretary Ken</u> <u>Salazar</u>. 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 Roebling 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, <u>http://www.floridahealth.gov/chdPasco/publications/Rabies/RabiesGuide2013Final.pdf</u>.

⁶ Tenter A. M., A. R. Heckeroth, 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 Hawaiina 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 and request a response from you about how the Department is addressing this pervasive conservation challenge.

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

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.

Citizens Committee to Complete the Refuge **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