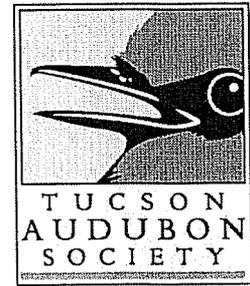


July 25, 2014

To the Honorable Chair and Members,
Pima County Board of Supervisors



Leaders in conservation
and education since 1949

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On behalf of Tucson Audubon Society I am writing to you regarding your upcoming hearing on the Community Cats Program. We understand you have been asked to approve spending \$200,000 per year of taxpayer's money to fund a three-year program.

We appreciate that there is vocal support from some sectors of the public for this proposal and that Members of the Board are compassionate, caring individuals. We also know that Members of the Board have shown a strong commitment to the conservation of native wildlife and to promoting public health and safety. Therefore, we ask you to consider the following important information as you deliberate the merits of adopting this program.

Often stated goals for Trap, Neuter, Release (TNR) programs are the reduction of euthanasia and reduced intake of feral cats into animal care centers. However, in our eyes the most important criterion of success for the effective management of feral cat populations is the reduction of the number of feral cats in the environment. We asked Best Friends, part-funder of the proposed project, for peer-reviewed and published scientific papers that show that TNR has at least a good chance of reducing the numbers of feral cats. We reviewed those that they sent us and we see that there is no clear evidence that TNR reduces these numbers. In fact, there are numerous peer-reviewed scientific studies that have concluded that TNR is *not* an effective method to control populations of feral cats.^{1,2,3,4,5}

Some of these studies indicate that TNR programs actually lead to an increase in the number of feral cats.^{1,3,5,6} Researchers from these studies concluded that these increases were the result of decreased territoriality following spaying or neutering, the supplemental feeding of cats associated with TNR colonies, and the increased abandonment of pets at colony sites by irresponsible owners. One long-term TNR study concluded that TNR was a waste of "money, time, and energy."³

TNR also keeps cats on the streets where they lead harsh and traumatic lives. TNR subjects cats to predation by coyotes, attacks by

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dogs and other feral cats; car collisions; ingestion of poison; exposure to disease; and more. Feral cats are far more likely to contract feline leukemia virus and feline immunodeficiency virus.⁷ Feral cats may also be a reservoir for parasites such as hookworms, and one Florida study found that over 92 percent of feral cats were infested with fleas.^{8,9} The numerous dangers and potential for suffering posed to feral cats are such that People for the Ethical Treatment of Animals (PETA) vigorously opposes TNR, taking the position that it is inhumane for the cats as well as the wildlife they hunt, injure, and/or kill.¹⁰

Feral cats are a non-native species in the United States and are efficient, instinctive predators. Contrary to claims by TNR practitioners, the feeding of feral cats does not eliminate the killing of wildlife. Scientific studies have repeatedly shown that even well fed cats hunt and kill wildlife instinctively and opportunistically.^{11,12} Research by scientists from the Smithsonian Conservation Biology Institute and the U.S. Fish and Wildlife Service recently estimated that cats are responsible for the deaths of no less than **1.4 billion birds and 6.9 billion mammals** in the United States every year.¹³ Even the mere presence of cats in the environment has been shown to reduce bird reproductive output and survivorship.¹⁴

Lastly, permitting feral cats to continue to roam outdoors is a threat to public health and safety. According to scientists from the Centers for Disease Control and Prevention, cats are consistently the number one carrier of rabies among domestic animals and pose a “disproportionate risk for potential human exposure.”¹⁵ Even when TNR programs incorporate rabies vaccinations, the required booster shots necessary to ensure public safety are almost never administered. Indeed, the Florida Department of Health advises that “the concept of managing free-roaming/feral domestic cats is not tenable on public health grounds because of the persistent threat posed to communities from injury and disease.”¹⁶ The Florida Department of Health further states that “allowing cats to roam free is not in the best interests of the community’s health and [that] deliberate release or abandonment of feral or domestic cats is not sanctioned under Florida’s conservation and cruelty laws.”¹⁶

Cats are also the essential host for the parasite that causes toxoplasmosis to complete its life cycle and may excrete hundreds of millions of the parasite’s infectious eggs in its feces.¹⁷ In people, toxoplasmosis has been linked to schizophrenia, Alzheimer’s, obsessive compulsive disorder, and other neuro-degenerative diseases and can cause sudden spontaneous abortion and fetal abnormalities in pregnant mothers. Furthermore, a new study has documented “remarkable” working memory performance reductions in seniors 65 and older that test positive for the parasitic disease.¹⁸ All of these reasons and more have led the National Association of State Public Health Veterinarians to conclude that roaming feral cats and TNR are detrimental to public and environmental health.¹⁹

Although some activist organizations, such as Best Friends, seek to maintain feral cat colonies outdoors and may even claim that TNR is grounded in science or widely accepted, many state agencies, professional societies, and non-profit organizations understand that maintaining cats outdoors is detrimental to cats, wildlife, and people. In fact, in 2013 a proposed bill that would have exempted TNR from abandonment prohibitions was rescinded after an outcry from private property owners and non-governmental organizations across the state of Florida.

Based on the overwhelming evidence that invariably indicates the failure of TNR to reduce feral cat populations and their associated risks to wildlife and human health and safety, we respectfully suggest that you utilize the best available scientific information and reject the proposal before you to incorporate TNR into the methods employed by the Pima Animal Care Center. Rather than promoting a program that will maintain roaming colonies of cats outdoors, the County would be better served by actively, effectively and humanely removing these feral animals.

If the Board of Supervisors adopts the TNR resolution, we ask is that adoption be for a limited period of three years, and that there should be a stipulation that funds be allocated to an independent organization to monitor the feral cat populations during this period in order that future decisions can be made based upon the data collected, within an adaptive management framework.

In August, many people travel to Tucson from around the nation to celebrate our region's birds by taking part in the Tucson Bird & Wildlife Festival, and spend their money while here. How incongruous it would then be for the County to decide to release significantly more feral cats, non-native predators and likely the single greatest source of anthropogenic mortality for US birds and mammals¹³, into Pima County's natural environment.

We attach Tucson Audubon's policy on feral cats for your information.

Thank you for your consideration,

Sincerely,



Dr. Paul Green
Executive Director



Christina McVie
Conservation Chair

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Tucson Audubon on Domestic and Feral Cats

February 2008

Background

Domestic cats (*Felis catus*) were brought into North America by humans. They are domesticated descendants of wild cats of northern Africa. Cats that escape to the wild at an early age or that are born of wild cats are unsocialized and are referred to as feral cats. Stray cats are house cats that can be caught and resocialized. Free-ranging house cats are those that live with people but that are allowed to go outside.

Cats that spend time outdoors, whether feral or socialized, kill hundreds of millions of birds and other small wildlife each year, including endangered species. They do this even if they are well fed, wear bells, and are declawed. This has been documented in many areas, and a small study in the Tucson area shows similar results. According to the Arizona Game and Fish Department, a University of Arizona study of five suburban house cats found they killed a total of 113 animals in just 12-15 weeks. The bird species they killed included not only common suburban birds but also Gambel's Quail, Inca Dove, Black-throated Sparrow, Lark Bunting, and Gila Woodpecker. Cats are documented to have killed a Cactus Ferruginous Pygmy-Owl. For information on feral and free-ranging cats in Arizona, see the Arizona Game and Fish Department brochure at www.azgfd.gov/pdfs/w_c/abci/KeepingCatsIndoors.pdf.

The lives of outdoor cats are generally difficult and much shorter than indoor cats. They are killed by diseases, cars, poisons and predators such as coyotes.

It is the view of the Conservation Committee of Tucson Audubon that we need to address the deleterious effect of cats on wildlife in our region. The two main approaches have been government registration and control of cats (similar to how dogs are regulated) and the trap-neuter-release (TNR) strategy. Tucson Audubon understands there are well-reasoned arguments on both sides. Advocates of TNR suggest it is more humane to maintain and feed colonies of spayed and neutered feral cats than to capture them. They argue that these cats live out their lives without reproducing, and can be protected from disease by inoculations at the time they are spayed or neutered.

Tucson Audubon believes the bulk of the evidence suggests that TNR is less effective at mitigating the effects of predation on already stressed native wildlife populations and diversity than municipal control efforts. While we do not argue with trapping and neutering, we do not believe that releasing cats into free-ranging colonies and feeding them is a responsible way to steward our environment. In addition, feeding wildlife, feral cats included, is not legal in Arizona. Managed colonies attract new feral cats that may reproduce before they are neutered or spayed. Managed colonies often do not decrease in size as hoped. And while cats in managed colonies may be protected from hunger and disease, they are not protected from predators, parasites, poisons and being hit by cars.

General Recommendations that Tucson Audubon can promote

Support the American Bird Conservancy's *Cats Indoors!* campaign:
www.abcbirds.org/abcprograms/policy/cats/.

Keep cats indoors. To allow cats time outdoors, walk them on a harness and leash, or create an outdoor enclosure. Encourage others to keep cats indoors. Domestic cats that are accustomed to going outdoors can be converted into indoor-only cats. There are many ways to keep indoor cats active and occupied; see the Arizona Game and Fish Department pamphlet at www.azgfd.gov/pdfs/w_c/abci/KeepingCatsIndoors.pdf.

Keep your cat healthy, inoculated from disease, and tagged or microchipped.

Spay or neuter your cat before it can reproduce. If you feel you want more cats in the future, consider adopting them from a shelter rather than allowing your cat to breed.

Do not feed stray or feral cats. Do not abandon a cat you cannot care for. Find it a home or take it to a shelter. For the shelter nearest you, see the directory at www.asPCA.org (click on "Adopt").

Support shelters that treat cats humanely and that make every effort to find non-outdoor homes for them.

Conduct an American Bird Conservancy "Cats Indoors!" campaign in your community, conduct a media campaign, or print an article or PSA in your organization's newsletter. More information and free materials are available at www.abcbirds.org/abcprograms/policy/cats/.

Support efforts of public land managers to humanely trap and remove cats from habitat managed for wildlife.

Work for local cat ordinances that prohibit cats from roaming off their owner's property. Encourage municipalities to adopt other measures to reduce predator activity, including bans on feeding feral cats and prohibition of TNR programs.

Where existing TNR managed cat colonies are threatening local wildlife populations, work with cat advocates to develop a plan and a timetable for permanent removal of those cats.

Specific Recommended Actions for Tucson Audubon

1. Promote the American Bird Conservancy's two sets of recommendations upon which the above was based: *Recommendations for Resource Managers* and *Recommendations for Conservationists* that appear in the American Bird Conservancy's Report "The impact of feral and free-ranging cats on bird species of conservation concern." Available at <http://www.abcbirds.org/newsandreports/NFWF.pdf>
2. Implement the recommendations contained in that report.
3. Initiate work with the University of Arizona to collect information on the effects of cats on wildlife populations in southern Arizona.

RECOMMENDATIONS FOR RESOURCE MANAGERS

Federal and state wildlife biologists provide the first line of defense in protecting rare birds from predators, including cats. However, their ability to protect rare birds is often hampered by inadequate funding and unwillingness by some staff to deal with potentially controversial issues such as predator control. The following recommendations may be helpful to resource managers.

- Identify predator threats at specific sites, including the use of nighttime monitoring.
- Increase efforts to trap and remove predators or undertake additional predator management where warranted.
- Increase predator removal measures where enclosures and/or electric fence are not effective or feasible.
- Conduct public outreach efforts to reduce detrimental human activities near nesting birds, including the distribution of informational brochures, such as ABC's "Keeping Cats Indoors Isn't Just For The Birds," placement of interpretive signs at nesting sites, informal on-site contact with the public, formal group presentations, and staffing of informational booths at local events and festivals.
- Coordinate management efforts, such as predator removal, with municipalities and other landowners.
- Encourage municipalities to adopt ordinances or other measures to help reduce predator activity, including bans on feeding of domestic or wild animals, and a prohibition of TNR programs.
- If managed cat colonies are threatening local wildlife populations, work with cat advocates to develop a plan and a timetable for permanent removal of those cats.
- Conduct research on developing more effective predator control measures.
- Increase state and federal funding requests for predator management.

RECOMMENDATIONS FOR CONSERVATIONISTS

Conservation groups and individuals have an important role to play in helping to educate the public on responsible pet ownership and in generating support for predator management projects. Here are some tips that can help protect birds from free-roaming cats in your community.

- Keep your own cats indoors, and walk it outside on a harness and leash, or in an outdoor enclosure. Encourage others to keep their cats indoors.
- Spay or neuter your cat at an early age before it can reproduce.
- Do not feed stray cats and never abandon a cat you can no longer care for. Instead, find a good home for your cat or take it to an animal shelter or humane society. For a shelter nearest you, see the National Shelter Directory at <http://www.asPCA.org>.
- Work for passage of local cat ordinances that prohibit cats from roaming off their owner's property.
- Conduct a *Cats Indoors!* campaign in your community. For free downloadable materials and more information, see <http://www.abcbirds.org/cats>.
- Support efforts of public land managers to humanely trap and remove cats from habitat managed for wildlife.
- Conduct a media campaign in your community using print and radio Public Service Announcements (PSAs) found at <http://www.abcbirds.org/cats>.
- Sponsor a children's poster competition for National Keep Your Cat Indoors Day, held on the second Saturday in May. For more information see <http://www.abcbirds.org/cats/NKYCID.htm>.
- Print an article or PSA in your organization's newsletter.
- Ask your state wildlife agency to print an article in their magazine and/or produce a Web page on the issue for their Web site.
- Ask your state wildlife agency to adopt the *Cats Indoors!* campaign and distribute brochures and other materials to the public through their visitor centers, educational programs, and displays.