



August 4, 2014

Pima County Board of Supervisors
Pima County Administration Building
130 W. Congress, 11th Floor
Tucson, AZ 85701

Re: "Community Cats" and Trap, Neuter, Release

Dear Chairwoman Bronson and Supervisors:

We understand that Pima County is considering whether to establish and fund a "community cat" Trap, Neuter, Release (TNR) program, which would sanction the establishment of feral cat colonies in Pima County. On behalf of American Bird Conservancy, Arizona Wildlife Federation, Audubon Arizona, Center for Biological Diversity, Coalition for Sonoran Desert Protection, Sky Island Alliance, and Tucson Audubon Society, we urge your **opposition** to this program due to the significant unintended consequences for public health, private property rights, and native wildlife populations that result from TNR feral cat colonies.

Trap, Neuter, Release Does Not Reduce Free-roaming Cat Populations

Despite the good intentions of many TNR practitioners, TNR programs simply do not effectively manage feral cat populations. Rather than disappearing, colonies persist for years and may actually lead to increases in the numbers of cats. Increases result from a failure to spay/neuter a sufficient number of cats (as high as 94% required), a lack of territoriality by spayed/neutered colony cats, the attraction of individuals to food provided to colonies, and the reputations of colonies as a convenient place to dump unwanted pets. Numerous peer-reviewed scientific studies have concluded that TNR is insufficient to effectively reduce feral cat populations.^{1,2,3,4,5}

¹ 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.

Feral Cat Colonies Threaten Public Health

The practice of enabling and maintaining colonies of feral cats is a recognized risk by public health scientists, agencies, and professional organizations such as the National Association of State Public Health Veterinarians.⁶ Cats are consistently the number one carrier of rabies among domestic animals and represent a “disproportionate risk for potential human exposure.”⁷ Even when feral cat colonies include an initial vaccination to rabies, cats almost never receive a follow-up vaccination necessary to protect the cat and the public. An ear-notch, therefore, is no guarantee of safety. Cats may also transmit the parasite that causes toxoplasmosis in people. Cats excrete the parasite into the environment through their feces, effectively contaminating soil and waterways. In people, toxoplasmosis has been linked to neuro-degenerative diseases such as schizophrenia and can cause miscarriages, birth defects, memory loss, and death.^{8,9}

Feral Cat Colonies Infringe on the Rights of Private Property Owners

Colonies of feral cats are often established on private property with varying degrees of documented permission from the property owner. Even when permission is granted, adjacent property owners may not be as quick to welcome large groups of roaming cats. These feral animals do not understand property boundaries and too often present risks and cause damage (e.g., defecating in gardens or children’s sandboxes). County endorsement of TNR will only make it harder for private property owners to resolve their concerns and unfairly sets the burden to keep cats out on the innocent victim rather than the offending colony.

Feral Cat Colonies Threaten Native Wildlife and Public Lands

Domestic cats are a non-native species that impose considerable ecological damage. Every year in the United States, outdoor cats kill approximately 2.4 billion birds, 12.3 billion mammals, and 650 million

² Andersen M.C., B.J. Martin, and G.W. Roemer. 2004. Use of matrix population models to estimate the efficacy of euthanasia versus trap-neuter-return for management of free-roaming cats. *Journal of the American Veterinary Medical Association* 225: 1871-1876.

³ Foley P., J.E. Foley, J.K. Levy, and T. Paik. 2005. Analysis of the impact of trap-neuter-return programs on populations of feral cats. *Journal of the American Veterinary Medical Association* 227: 1775-1781.

⁴ Schmidt P.M., T.M. Swannack, R.R. Lopez, and M.R. Slater 2009. Evaluation of euthanasia and trap-neuter-return (TNR) programs in managing free-roaming cat populations. *Wildlife Research* 36: 117-125.

⁵ Longcore T., C. Rich, and L.M. Sullivan. 2009. Critical assessment of claims regarding management of feral cats by trap-neuter-return. *Conservation Biology* 23: 887-894.

⁶ National Association of State Public Health Veterinarians. 1996. Free-roaming/Unowned/Feral Cats. Position Statement. <http://www.abcbirds.org/abcprograms/policy/cats/pdf/NASPHV%201996%20-%20Free-roaming,%20unowned,%20feral%20cats.pdf>.

⁷ 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.

⁸ Torrey E. F. and R. H. Yolken. 2013. *Toxoplasma oocysts as a public health problem. Trends in Parasitology* 29: 380-384.

⁹ Gajewski P.D., M. Falkenstein, J.G. Hengstler, and K. Golka. 2014. *Toxoplasma gondii* impairs memory in infected seniors. *Brain, Behavior, and Immunity* 36: 193-199.

reptiles and amphibians.¹⁰ Unfortunately, feeding cats does not eliminate this instinctive hunting behavior.¹¹ Not only are these wildlife species public trust resources, many are also protected by a variety of laws including the Migratory Bird Treaty Act and the Endangered Species Act (e.g., masked bobwhite, mountain plover, southwestern willow flycatcher). To support a program that intentionally releases non-native predators into an environment with known endangered species is a potentially severe legal liability.

The overpopulation of cats in Pima County is certainly a tragic problem, but the implementation of a TNR program will only perpetuate that problem. Furthermore, TNR programs and their associated feral cat colonies violate the Pima County Code of Ordinances (§6.04.110, §6.04.120, §6.04.180). Given the evidence that TNR fails to effectively control cat populations and presents numerous risks to public health, private property, and wildlife, we urge the Pima County Board of Supervisors to oppose funding or legitimizing TNR programs in the County.

We appreciate your consideration.

Sincerely,

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Director of Invasive Species Programs, American Bird Conservancy

Tom Mackin
President, Arizona Wildlife Federation

Sarah Porter
Executive Director, Audubon Arizona

Randy Serraglio
Southwest Conservation Advocate, Center for Biological Diversity

Carolyn Campbell
Executive Director, Coalition for Sonoran Desert Protection

Jan Holder
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Dr. Paul Green
Executive Director, Tucson Audubon Society

¹⁰ 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.

¹¹ Adamec R. E. 1976. The interaction of hunger and preying in the domestic cat (*Felis catus*): an adaptive hierarchy? *Behavioral Biology* 18: 263-272.