



(Sample TNR Policy Presentation)

**Trap-Neuter-Return: Developing an Effective
Strategy for the Permanent Reduction of
Feral and Stray Cat Populations in *[insert
name of your community]***

(NOTE: portions in red [electronic file] or bold [printed version] need to be filled in or adapted pursuant to the relevant facts and data in your community. All other portions of the presentation should be read closely to see if further changes need to be made to fit your particular circumstances. Pagination in Table of Contents may need to be adjusted.)

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Trap-Neuter-Return: Developing an Effective Strategy for the Permanent Reduction of Feral and Stray Cat Populations in *[insert name of your community]*

Foreword

“The ASPCA supports Trap-Neuter-Return (TNR) as the most humane and effective strategy for managing the feral cat population....”¹

American Society for the Prevention of Cruelty to Animals Policy Statement

[Include also one or two quotes from prominent animal welfare professionals in your community. Include full text of their statements as appendixes similar to the ASPCA policy statement quoted from above.]

Introduction

[Insert name of your proposed TNR program] is an animal control program designed to resolve our community’s severe feral and stray cat overpopulation crisis through the use of Trap-Neuter-Return, popularly known as TNR.² The proposed program includes workshops to train members of the public in how to perform TNR, support services such as trap banks and free or low cost spay/neuter, referrals by animal control of feral and stray cat complaints to the program, and shelter policies designed to encourage the use of TNR by the public **[add or subtract program elements as appropriate]**. The question now is whether to make Trap-Neuter-Return official policy for dealing with feral and stray cats in *[insert name of your community]*.

To properly evaluate this issue, it first should be recognized that the current system of feral and stray cat control in *[your community]* is failing. Exact figures on the cats’ population are elusive, but can be estimated. Dr. Julie Levy, DVM, a professor at the University of Florida, Gainesville and one of the leading academicians in the feral cat field, recently evaluated demographic studies on the topic and concluded that, “[f]or purposes of estimating the size of a community’s feral cat population, it is reasonable to estimate 0.5 cats per household.”³ In *[your community]*, there are approximately *[insert number of]* households **[go online and look up the US Census for number of households in your town, city or county]**,⁴ leading to an estimate of *[insert number of]* feral cats by this formula. **[NOTE: If you have reliable estimates of the number of feral cats from other sources for your community, perhaps based on figures from**

¹ See Appendix 1 for full ASPCA Statement on Trap-Neuter-Return.

² “Feral” refers to cats who are living outside human homes and have reverted to a wild state, while “stray” refers to cats who have been recently abandoned and are still domesticated. Most street cats are feral and tend to live in family groups referred to as colonies.

³ Levy, Julie, DVM, “Feral Cat Management,” Chap. 23, p. 378, in *Shelter Medicine for Veterinarians and Staff* (Blackwell Publishers, 2004) [hereinafter referred to as “Levy”].

⁴ U.S. Census 2000.

animal control or local animal organizations, mention these estimates too, and add a footnote if necessary to describe the source.]

Whatever their actual total number may be, feral and stray cats can be found throughout our community. Their unchecked reproduction has created a significant burden in terms of quality of life. As catalogued by Dr. Margaret Slater, DVM, of Texas A&M, another leading veterinarian in the field, complaints include such behaviors as, “spraying, fouling yards and gardens with feces, yowling and fighting; sick, injured, or dead cats; and dirty footprints on cars.”⁵ The cats have commonly been accused of driving people from their gardens and backyards with the noxious odor of unaltered males spraying, and waking residents up night after night from the noise of fighting and mating. An estimated **1 of every 5 calls [insert the percentage of calls to animal control in your community related to stray or feral cats]** that comes into animal control from the public relates to feral cats.⁶ This amounts to approximately **[insert number]** feral cat calls per day **[or week or month]** on average⁷ or **[insert total number calls per year]** calls annually. This annual figure over the past few years has been **[constant or rising.]**⁸

The impact of the feral and stray cat population goes beyond quality of life issues and reaches far into the cost and effectiveness of our community’s animal control system. The unneutered street cat population serves as a constant source of new cats and kittens. Many of these animals find their way into local shelters, taking up badly needed space, making it more difficult to adopt out cats already rescued and contributing to a financial burden of **thousands or hundreds of thousands** of dollars a year **[insert whichever applies]** from the cost of euthanizing cats.

To date, the official policy for dealing with feral cats has been a mixture of “trap-and-kill” - so named because ferals are unadoptable and invariably end up being euthanized when captured - and doing nothing. Both approaches have failed and will continue to fail if further pursued.

As will be explained fully, because of feral population dynamics, trap-and-kill has no impact on the overall number of cats, creating no more than short-lived dips in their levels. The method is particularly ineffective when practiced sporadically and in random locations **[as has been the case for many years in our community – include if applicable.]**

[Note: adapt or eliminate the following paragraph if ignoring the problem is not the dominant approach by animal control in your community.] Doing nothing simply allows a bad situation to get worse, yet ignoring the problem has been the dominant approach so far. The reason for this is simple: lack of resources. There are currently a total of **[insert number]** of field officers to contend with all of the **[insert as applicable: hundreds or thousands or tens of thousands]** of rapidly reproducing, elusive feral cats throughout our community. Even if the officers spent every working hour trying to capture the cats, they would never get more than a small percentage. The officers’ limited time is considered better spent on more immediate and solvable problems.

⁵ Slater, Margaret R., DVM, *Community Approaches to Feral Cats*, p. 39 (Humane Society of US Press, 2002) [hereinafter referred to as “Slater”].

⁶ **Cite the source for your figures for percentage of calls attributed to stray/ferals and how many calls this amounts to per day, week or month.**

⁷ **Ibid.**

⁸ **Id.**

In sum, the present situation in *[your community]* is characterized by a *[city or town]* overrun with feral and stray cats, an animal control agency flooded with complaints that cannot be addressed *[or: an animal control agency flooded with complaints that never go down in volume]*, a shelter system overburdened with the cats and their offspring, and the employment of methodologies that have completely failed in the past and have no reasonable chance of success in the future. Clearly the time has come to take a new approach.

An alternative that has proven effective at controlling the cats' population in many communities does exist: Trap-Neuter-Return (TNR). TNR involves three steps: (1) trapping the cats in a colony, (2) veterinary intervention in the form of neutering, eartipping⁹ and rabies vaccination, and (3) return of the cats to their home territory where they are then fed, sheltered and monitored on an ongoing basis by a designated caretaker. Whenever possible, kittens and friendly, adoptable adults are removed from the colony and offered for placement in homes.

[Note: If TNR is already being unofficially practiced in your community, give a brief one paragraph description of the successful efforts already underway. For example: In the five years since the method was brought to New York City by Neighborhood Cats, a great deal has been accomplished. Hundreds of local feral cat caretakers have been trained to practice TNR. Free spay/neuter services for ferals are provided by both the American Society for the Prevention of Cruelty to Animals (ASPCA) and the Humane Society of New York, and thousands of feral cats have been altered. Several city agencies have utilized TNR to successfully address their own feral cat problems, including the Parks Department, the Correction Department, the NYPD and the Department of Sanitation. In addition, the Mayor's Alliance for NYC's Animals has embraced TNR by forming the New York City Feral Cat Council, a coalition of local organizations involved in implementing the technique.]

As described in this report, TNR is growing increasingly popular and being utilized in more and more communities across the nation. This movement can be attributed to its many proven advantages over more traditional methods of animal control, including permanent reduction of feral and stray cat populations, cost savings to animal control and the elimination of nuisance behaviors like spraying and fighting. In addition, by returning the ferals to their territory, TNR allows the neutered and vaccinated cats to provide the public health benefits of rat abatement and protection against rabies transmission from wildlife species. The lower feral population also helps to lower any predation on birds and wildlife by the cats.

Unlike any other method known, Trap-Neuter-Return holds out the realistic possibility of a permanent, long-term solution to feral and stray cat overpopulation and all its associated ills. That is what *[name of your proposed TNR program]* is all about.

⁹ "Eartipping" is the universal sign of a neutered feral cat and involves removing the tip of the left ear in a straight line cut.

The Advantages of TNR

- **Feral and Stray Cat Population Reduction**

TNR reduces free-roaming cat populations through two means – first, by the removal of adoptable cats,¹⁰ and, second, through attrition outpacing births over time.

An excellent example of both means is provided by the twelve year old TNR program practiced with municipal approval and cooperation in Newburyport, a popular coastal town in Massachusetts. In 1992, after attempts to eradicate the approximately 300 cats living on the town's waterfront had failed, the municipality agreed to allow a TNR project. In 1992 through 1993, a private organization, Merrimack River Feline Rescue Society,¹¹ trapped all of the cats and kittens. 200 were removed for adoption, resulting in an immediate population decline of over 66 percent.¹² The other 100 cats were returned and then closely monitored over subsequent years. Some died or disappeared, while others became adoptable and were removed. Presently in 2004, there are 17 cats left, representing a decline of 83 percent from the original number returned, and a drop of 94 percent from the 300 cats present prior to the initiation of TNR.¹³

One of the first feral cat colonies worked on in *[your community] by [your organization or relevant individual]* provides an excellent example of the positive impact of TNR. *[Note: provide details of population reduction from an early TNR project in your community. For example: From September, 1999 through June, 2000, a total of 29 out of 32 cats and kittens were trapped.¹⁴ 20 of the cats were removed and adopted out, 1 was removed and placed in a sanctuary, while 8 were released back to the site. Of the 8 released, within the first year 1 died and 2 went missing, leaving a total population remaining at the site in June, 2000, of 8 cats (5 neutered, 3 untrapped and unneutered), a total population reduction in less than one year of 75 percent.¹⁵ Currently, as of July, 2004, there are 5 cats residing in the territory, representing a drop of 84 percent following the advent of TNR at the site.¹⁶]*

Other TNR success stories in *[your community]* in terms of population control are abundant. *[Note: describe other successful TNR projects in and around your area. Give as precise numbers as you can in terms of how many cats were there when the project started, how many are there now, what is the percentage decline, etc. Add footnotes and give citations to your sources. Mention any testimonials you have gathered from the heads of agencies, institutions, etc., which express gratitude for and/or recognize your efforts and include the full testimonials as Appendices. Same with any press clippings – mention them and then include the full articles as Appendices. This section, which might extend a page or two, is your chance to show TNR is already working in your community.]*

¹⁰ Slater, p.14.

¹¹ www.mrfrs.org

¹² Correspondence, Stacey LeBaron, President, Merrimack River Feline Rescue Society, July 15, 2004.

¹³ Ibid.

¹⁴ *Cite to source – include any documentation like a tracking sheet as an Appendix.*

¹⁵ *Ibid.*

¹⁶ *Cite to source.*

When TNR has been taken to the next level and practiced not just anecdotally at select sites, but on a community-wide basis, feral cat population reduction has been dramatic, as reflected by lower intake and euthanasia rates.¹⁷ In San Diego County, from 1988 through 1991, stray cat intake rates for municipal shelters were rising at a rate of approximately 10% a year, peaking in fiscal year 1991-1992 at a total of 19,077 cats, of whom 15,525 were euthanized.¹⁸ In 1992, the Feral Cat Coalition of San Diego was founded and began implementing TNR on a county-wide basis. Two years and 3100 neutered feral cats later, stray intake rates had dropped by 35% and euthanasia by 40% with no other plausible explanation for the declines other than the TNR efforts.^{19 20}

In San Francisco, beginning in 1993, the San Francisco SPCA combined with San Francisco Animal Control to introduce a comprehensive city-wide TNR program, one that combined no cost spay/neuter with educational initiatives and incentives for getting feral cats altered. From 1993 through 1999, cat impounds dropped by 28%, euthanasia rates for feral cats dropped by 73%, and euthanasia rates for all cats fell by 71%.²¹

Maricopa County, Arizona, is one of the most heavily populated and rapidly growing regions in the country. Maricopa County Animal Care & Control introduced a TNR program (entitled Operation FELIX) as part of a comprehensive spay/neuter and adoption program. As a result of the overall program, there was a drop in the euthanasia rate from 25 cats per 1000 county residents to only 9 cats per 1000.²² FELIX was considered so successful that the Maricopa County Board of Supervisors has passed a resolution declaring TNR the official county policy for feral cat control.

In southern Florida, where local TNR programs were introduced in the early 1990's, euthanasia by animal control has dropped by half with most of the decline attributed to fewer cats being killed. For example, in 2001, all shelters combined in the Fort Lauderdale/Miami corridor euthanized 14.1 cats and dogs per 1000 residents, compared to 33.0 per 1000 in 1997.²³ In Tampa, where TNR has not been implemented, the euthanasia rate in 2001 was 32.4 cats and dogs per 1000 residents, while across the bay in St. Petersburg where TNR has been widely practiced, the rate is only 13.7.²⁴

Proof that TNR effectively reduces feral populations in the long term also comes from the academic community. Dr. Levy conducted an eleven year TNR project at her campus at the University of Florida, Gainesville.²⁵ The program resulted in a 66% decline in the feral population over the course of the study. Dr. Levy concluded that, "A

¹⁷ Reducing the feral population lowers euthanasia rates in primarily two ways. First, fewer feral cats are brought into shelters and euthanized. Second, fewer feral kittens means friendly cats already in the system face less competition for shelter space and homes and are spared euthanasia.

¹⁸ Chappell, Michelle, DVM, "A Model for Humane Reduction of Feral Cat Populations," *California Veterinarian* (Sept/Oct 1999).

¹⁹ Ibid.

²⁰ Cat Fanciers Association Almanac (1995), www.cfainc.org/articles/trap-alter-release.html

²¹ San Francisco SPCA report, Sept. 2000.

²² Leonard, Christina, "Animal Control sets records with more adoptions, less euthanasia," *The Arizona Republic*, July 15, 2002.

²³ Clifton, Merritt, "Where cats belong--and where they don't," *ANIMAL PEOPLE*, June 2003.

²⁴ Ibid.

²⁵ Levy, J., "Evaluation of the effect of a long-term trap-neuter-return and adoption program on a free-roaming cat population," *Journal of the American Veterinary Medical Association*, Vol. 222, No. 1, January 1, 2003.

comprehensive long-term program of neutering followed by adoption or return to the resident colony can result in reduction of free-roaming cat populations in urban areas."

- **Cost Savings**

TNR provides substantial cost savings to animal control in two ways. First, there is the volunteer manpower generated to get the cats fixed and stop them from reproducing. Even now, at its early stages in *[your community]*, TNR has brought countless hours of volunteer labor to bear on getting the feral cat situation under control, none of which has cost the *[city or town]* a cent. Given the magnitude of the problem, there is no realistic possibility the municipality could ever itself fund a large enough animal control work force to resolve the overpopulation crisis. The volunteers and the cost savings they represent are crucial to move beyond the current state of affairs.

Substantial cost savings are also realized when TNR is implemented on a large enough scale to realize lower euthanasia rates in municipal shelters. In San Diego, during the period of 1992 through 1994, the average cost of interning and then euthanizing a cat was \$121. The 40% drop in euthanasia over those two years from the privately funded county-wide TNR program saved the county approximately \$796,000.²⁶

[The animal control agency in your community] estimates that the cost of processing and euthanizing a cat surrendered to a municipal shelter is *[\$XX per cat]*. In fiscal year 2003-2004, a total of *[insert number]*²⁷ cats were euthanized by animal control at an approximate total cost of *[insert total amount of \$ by multiplying number of cats by cost per cat]*.²⁸ Every 10% reduction in the number of cats euthanized would save over *[insert amount of \$ equaling 10 percent of last figure]* per year. **[Note: if your town has a animal control contract for a fixed sum of \$, get an educated estimate of the amount attributable to euthanizing cats and what savings could be had by lowering the euthanasia rate.]**

[Animal control in your community's] euthanasia figures for cats over the last four fiscal years are in sharp contrast to the progress and cost savings demonstrated in communities with successful TNR programs. Cat intake and euthanasia figures for the past four fiscal years at animal control were as follows:²⁹

[NOTE: Insert a chart showing the relevant figures from your community. For example:]

	<u>Intake</u>	<u>Euthanized</u>	<u>% euthanized</u>
2000-2001	1,250	890	71%
2001-2002	1,100	800	73%
2002-2003	1,025	725	71%
2003-2004	1,200	825	69%

²⁶ Chappell, Michelle, DVM, "A Model for Humane Reduction of Feral Cat Populations," *California Veterinarian* (Sept/Oct 1999).

²⁷ *Cite to source.*

²⁸ *Cite to source.*

²⁹ *Cite to source.*

[Note: the analysis in the following paragraph is based on the sample chart above – change the numbers and relevant commentary to reflect the intake, euthanasia and % euthanized data in your community.]

Thus, in fiscal year 2000-2001, animal control euthanized 890 cats, equaling 71% of all cat intakes whereas in fiscal year 2003-2004, animal control euthanized 825 cats, equaling 69% of intakes. Little progress has been made in four years. Indeed, cat euthanasia in absolute terms rose 12% in 2003-2004 compared to the year before (100 more cats euthanized), while cat intakes rose 16% (175 more cats). This means animal control expended more funds this past year to intake and euthanize cats than it did the year before, despite slightly lowering the percentage of cats euthanized. These higher numbers may well reflect a growing street cat population. Unless the feral cat population is brought under control, not only will cost savings go unrealized, costs could actually rise further.

Studies have found there is a significant cost savings even when the municipality itself funds TNR efforts and does not rely on private organizations to bear the costs. Orange County, Florida, implemented a TNR program for two and a half years from 1995 through 1998. Previously, when they received a feral cat complaint, they sent out an officer to trap the cat, held the animal for the mandatory waiting period, then euthanized. This cost \$105 per cat. By contrast, having volunteers trap the cats and then providing spay/neuter and vaccination services cost the county \$56 per cat, a savings of \$109,172 over the length of the study (2228 cats).³⁰

A recent TNR project performed in *[your community]* exemplifies how TNR, by creating public-private partnerships, can solve animal control problems while at the same time reducing costs to the municipality. **[Note: If you can, insert an example of a TNR project in your community which saved the municipality money because (1) the work was done by private groups who bore all the costs instead of animal control and (2) the project succeeded in lowering or stabilizing the population of feral cats. Include any involvement at all by animal control or municipal officials. For example:**

Annette R., a resident of the Uptown area, was feeding a large colony of unneutered feral cats in her backyard when a neighbor called animal control to complain about kittens on his property. Rather than proceeding to make a costly and time-consuming attempt to trap, remove and euthanize the colony, animal control contacted [the local TNR organization] who agreed to coordinate a TNR project. Annette was trained at a workshop and subsequently, using personnel and equipment provided by [the local TNR organization] all 11 adults and 12 kittens in the colony were trapped. The adults were neutered at a local clinic with private funds and then returned to the property, while all the kittens were placed for socialization and adoption with another local nonprofit. The result was an immediate population reduction of over 50 percent, the prevention of future litters of kittens, greatly diminished nuisance behavior for the neighborhood, and all at zero cost to animal control.]

³⁰ Hughes, K., Slater, M., Haller, L., "The Effects of Implementing a Feral Cat Spay/Neuter Program in a Florida County Animal Control Service," *Journal of Applied Animal Welfare Science*, Vol. 5, No. 4 (2002).

- **Reduced Nuisance Behavior and Fewer Complaints**

Neutering the cats resolves most quality of life issues. The noxious odor associated with the spraying of unaltered males is caused by testosterone in the urine. Once the cat is fixed, this is no longer a problem. The cessation of reproductive activity also brings an end to mating behavior and the noise associated with it – both the yowling of females in heat and the fighting among male cats. In addition, neutered feral colonies tend to roam much less and so become much less visible.

According to Dr. Slater’s research, “Managed colonies of feral cats can be part of the solution to nuisance complaints.”³¹ Dr. Slater cites one animal control agency in Florida that found complaints in a six-square block area dropped by half after implementation of a TNR program.³² In the city of Cape May, New Jersey, complaints to animal control about cats dropped by 50 percent after four years of sanctioned TNR.³³ After funding and running its own TNR program, the Animal Services Department of Orange County, Florida, also reported decreased complaints about cats.³⁴

The approximately *[insert number of]* complaints received per year by *[your animal control agency]* about feral cats demands a new and more effective approach.

- **Caretaker Cooperation**

No effective animal control policy for feral cats can be implemented on a large scale without the cooperation of the people who feed and watch over the cats on a daily basis. Trapping cats is generally accomplished by baiting humane box traps that close behind a cat when he enters to eat the bait. If food is not withheld the day prior to trapping, many cats will not enter the traps. Caretaker cooperation in withholding food is thus essential. Caretakers also possess unique knowledge regarding the cats, including their numbers, habits and whereabouts. As a result, a caretaker can either greatly assist or effectively thwart animal control efforts.

A survey of cat caretakers who presented cats for sterilization in a TNR program revealed that they are intensely bonded to the cats they feed and will not participate in animal control programs that threaten their felines’ welfare.³⁵ At the same time, caretakers are easily recruited to perform much of the labor involved in getting the cats controlled through sterilization, representing, as mentioned, a substantial cost savings compared to traditional animal control programs using paid staff.³⁶ Thus, TNR is an effective tool for enlisting public support to solve a difficult community problem while at the same time mitigating public anger resulting from either the “trap-and-kill” or “do nothing” methodologies.

³¹ Slater, p. 39.

³² Ibid.

³³ Id.

³⁴ Levy, p. 381.

³⁵ Centonze LA, Levy JK, “Characteristics of feral cat colonies and their caretakers,” *Journal of the American Veterinary Medical Association* 2002; 220:1627-1633.

³⁶ See caretaker participation in sterilization clinics described in: Williams LS, Levy JK, Robertson SA, Cistola AM, Centonze LA, “Use of the anesthetic combination of tiletamine, zolazepam, ketamine, and xylazine for neutering feral cats,” *Journal of the American Veterinary Medical Association* 2002; 220:1491-1495.

The Lack of Effective Alternatives for Feral Cat Control

One of the most powerful arguments for Trap-Neuter-Return as a method of feral and stray cat control is also one of the most basic – nothing else works. Whatever its imperfections in practice and theory, TNR is the **only** animal control methodology that has shown a reasonable chance of controlling feral cat populations in an **[urban or rural]** environment like **[your community.]** Whatever ills one may rightly or wrongly associate with feral cats – whether it’s public health concerns, wildlife predation or anything else – those problems will not be reduced without a reduction in the level of the feral cat population. To achieve this, TNR is the only approach with hope of success, as an examination of the available alternatives makes clear.

- **Trap-and-kill**

Trap-and-kill has been the traditional approach of animal control in the United States towards free-roaming cats for decades. It should be enough to conclusively establish the complete failure of this method by pointing out that current estimates of the number of feral cats in this country now run into the tens of millions.³⁷ Trying to remove the cats doesn’t work to lower their numbers. It’s a clumsy, simplistic technique that completely fails to take into account critical environmental factors and feral cat population dynamics. Trap-and-kill results in nothing but turnover – new feline faces, but not fewer. There are a number of reasons for this, including (a) the “vacuum effect,” (b) overbreeding by untrapped cats, (c) abandonment of domestic cats and, (d) lack of animal control resources.

The Vacuum Effect

The “vacuum effect” was first chronicled by wildlife biologist Roger Tabor during his studies of London street cats. He observed that when a colony of feral cats was suddenly removed in toto from its territory, cats from neighboring colonies soon moved in and began the unchecked cycle of reproduction anew until the population was back up to its former level.³⁸ As explained in another study, “the presence of feral cats in a place indicates an ecologic niche for approximately that number of cats; the permanent removal of cats from a niche will create a vacuum that then will be filled through migration from outside or through reproduction within the colony, by an influx of a similar number of feral cats that are usually sexually intact; and removal of cats from an established feral colony increases the population turnover, but does not decrease the number of cats in the colony.”³⁹

Migration of new cats into recently vacated territory can be traced to two factors: first, feral cats are present at a particular location for a reason - the habitat provides adequate food and shelter. Second, no feral colony is an island, but is part of an extensive ecosystem containing similar colonies, one adjoining the next. As a result, if a

³⁷ Slater, p. xi.

³⁸ Tabor, Roger, “The Wild Life of the Domestic Cat,” p. 183 (1983) [hereinafter referred to as “Tabor”].

³⁹ Zaunbrecher, Karl I., DVM, & Smith, Richard E., DVM, MPH, “Neutering of Feral Cats as an Alternative to Eradication Programs,” *Journal of the American Veterinary Medical Association*, Volume 203, Number 3, August 1, 1993.

colony is removed from its territory, but the habitat is left unchanged, neighboring cats will move right in to take advantage of the food source and shelter that remains. Reproduction and population growth ensue until the natural ceiling is again reached, that being the number of cats the habitat can support.⁴⁰

Eliminating all food sources is virtually impossible.⁴¹ Once a cat is spotted by a kind soul who starts to leave food, a food source is created. People are going to feed outdoor cats no matter what, as the ineffectiveness of feeding bans with serious civil and criminal consequences has demonstrated.⁴² It is also difficult in institutional settings, whether it's jails, restaurants or apartment complexes, to adequately seal dumpsters and other garbage containers to keep out feral cats.

Overbreeding

The trapping and removal of every member of a feral colony is a difficult and time-consuming task. Even TNR activists have great difficulty in capturing 100 percent of a colony and must allow at least several days of trapping efforts to accomplish this. When busy animal control personnel attempt to trap a feral colony, inevitably some cats are left behind. With less competition for the food and shelter that remains, these cats reproduce faster and more of their offspring survive until the carrying capacity of the habitat is again reached.⁴³

Abandonment

Unaltered domestic cats are constantly being abandoned into our streets, often by uneducated owners who do not realize problem behaviors by sexually intact cats could be readily resolved by neutering. Without monitors and caretakers in place to quickly capture and either fix or adopt out these former domestics, they too, are available to repopulate any suitable habitat made vacant by trap-and-kill efforts.

Lack of animal control resources

Few communities, including *[your community]*, have the resources to devote to trying to trap and remove a significant percentage of the feral cats in the municipality.

Waukegan, Illinois: a case study in the failure of trap-and-kill

Waukegan, Illinois is a township of 88,000 located on the shore of Lake Michigan. Waukegan's long-standing method for controlling their feral cat population has been the traditional trap-and-kill.⁴⁴ Recently, the town has made news by trying to effectively ban TNR. The town's council enacted an ordinance that forbids the release of any cat except into an outdoor enclosure. To build and operate such an enclosure, a kennel license must

⁴⁰ Clifton, Merritt, "Seeking the truth about feral cats and the people who help them," *ANIMAL PEOPLE*, Nov. 1992.

⁴¹ Hartwell, Sarah, "Why Feral Eradication Won't Work," (1994, 2003), www.messybeast.com/eradicat.htm.

⁴² E.g., a court in Fort Lee, NJ, where feeding any animal outdoors is banned, recently fined a stray cat feeder \$300 and threatened her with a 30 day jail term if she continued. Nonetheless, Neighborhood Cats has documented the ongoing feeding and care of scores of feral cats in the township.

⁴³ Clifton, Merritt, "Street Dog & Feral Cat Sterilization and Vaccination Efforts Must Get 70% or Flunk," *ANIMAL PEOPLE*, October 2002.

⁴⁴ Hamill, Sean, "Neuter, release program for feral cats stirs debate," *Chicago Tribune*, July 7, 2004.

be sought and paid for. In addition, a prior ban against feeding stray cats is in effect. Stiff fines enforce these provisions.⁴⁵

According to Tina Fragassi, the local animal control warden, her agency has trapped and removed approximately 500 feral cats each of the past eleven years.⁴⁶ In Ms. Fragassi's view, this steady number reflects the success of Waukegan's policies in controlling the cats.⁴⁷ The truth is just the opposite and points to the futility of trap-and-kill.

That every year 500 cats need to be trapped indicates the feral population is remaining at the same level. The feline faces may be changing, but the total number of cats is staying the same. As a result, every year in Waukegan the same amount of time and wages is invested in animal control seizing 500 cats, the same cost is incurred by the township in adhering to mandatory waiting period and euthanasia requirements, and the same number of complaints are made. By contrast, a successful animal control approach would mean fewer and fewer feral cats in the community as reflected by continually *falling* seizures, costs and complaints. This is the goal of TNR. As explained by Dr. Slater, TNR “should be considered an interim solution to the problem of feral, free-roaming cats – the first step towards reducing the size of the colony through attrition.”⁴⁸

- **Eradication**

Eradication of feral cats, defined as the one hundred percent removal of all ferals from an area, has been advocated since at least 1916.⁴⁹ The method has proven successful, however, only on small, uninhabited islands after decades of intensive control measures including poisoning, hunting, trapping and introduction of infectious feline diseases.⁵⁰ One of the best-known examples of the difficulty of eradication is Marion Island, a small uninhabited island (12 miles x 8 miles) located southeast of South Africa between South Africa and Antarctica.⁵¹

In 1949, a group of scientists left the island, leaving behind 5 unneutered cats. By 1977, there were an estimated 3,400 cats preying on ground-nesting seabirds.⁵² Deliberate infection of the feral cat population with Feline Panleukopenia Virus (feline enteritis) followed and killed around 65% of the cat population by the early 1980's.⁵³ Many of the remaining 35% developed immunity to the disease and continued to breed.⁵⁴ Between 1986 and 1989, 897 cats were further exterminated by hunting. Traps with poison baits were then used to kill the cats who eluded the guns. No cats have been seen since 1991. In 1993, sixteen years after it was begun, the eradication program was declared a success.⁵⁵

⁴⁵ Ibid.

⁴⁶ Hamill, Sean, Chicago Tribune reporter, interview of Tina Fragassi.

⁴⁷ Ibid.

⁴⁸ Slater, p. 14.

⁴⁹ Berkeley, Ellen Perry, *Maverick Cats*, p. 121 (New England Press, 1982, 2001).

⁵⁰ Levy, p. 380.

⁵¹ Hartwell, Sarah, “Why Feral Cat Eradication Won’t Work,” (1994, 2003), www.messybeast.com/eradicat.htm.

⁵² Ibid.

⁵³ Id.; Berkeley, pp. 123-124.

⁵⁴ Hartwell (see fn. 71, *supra*).

⁵⁵ Ibid.

The methods used on Marion Island – introduction of infectious disease, shooting and poisoning – would be unfeasible in a populated area such as *[your community]* for safety, cost and aesthetic reasons.⁵⁶ Even assuming such techniques could be employed, the vacuum effect discussed earlier, which was not present in a geographically isolated situation like Marion Island, would likely outpace eradication efforts.

Despite these considerations, Akron, Ohio recently undertook an attempt to eradicate all free-roaming cats within its city limits. On June 25, 2002, the City Council passed a cat confinement law that authorized the animal control warden to seize and euthanize any cat at large if left unclaimed.⁵⁷ Animal control reportedly requested an additional annual budget of \$410,385 to trap-and-kill what they estimated would be a total of 3500 cats.⁵⁸

Over the next two years following the law's enactment, a total of 2750 cats were picked up and killed.⁵⁹ It is too soon to say whether the law will eventually have its desired effect of eliminating free-roaming cats or whether, as in Waukegan, animal control will continue to seize a consistent number of cats on an annual basis. But it is already abundantly clear that the trap-and-kill program has had serious negative side effects. The killing has spawned extreme divisiveness within the community between animal advocates and municipal officials,⁶⁰ has given rise to at least one lawsuit,⁶¹ has created negative publicity for Akron on a national scale,⁶² has cost the city hundreds of thousands of dollars between the trapping efforts and litigation, and has ship-wrecked the county animal shelter because of the sudden deluge of cats.⁶³

Akron represents the antithesis of what is needed to successfully control feral cat populations on a large scale. According to Dr. Levy, “Clearly, any realistic plan to control feral cats must recognize the magnitude of the feral cat population, the need to engage in continuous control efforts, and the significance of the public’s affection for feral cats. The most successful examples of enduring community-wide animal control have incorporated high-profile non-lethal feral cat control programs into integrated plans to reduce animal overpopulation.”⁶⁴

⁵⁶ Levy, p. 381.

⁵⁷ Akron OH Municipal Code, Title 9, sec. 92.15; *see also*, Sangiacomo, Michael, “Akron law to trap, kill cats is OK, judge rules,” *Cleveland Plain Dealer*, May 6, 2004.

⁵⁸ Pet FBI (2002), www.petfbi.com/issuetravel.htm

⁵⁹ Sangiacomo, Michael, “Akron law to trap, kill cats is OK, judge rules,” *Cleveland Plain Dealer*, May 6, 2004.

⁶⁰ Protest held in front of City Hall (Wallace, Julie, “Akron may help cats get to homes,” *Akron Beacon Journal*, Feb. 11, 2004); City Council received 1200 letters protesting the ordinance, 10 in favor (Cat Fanciers’ Association Legislative Group, “Trends in Animal Legislation: The Year 2002 in Review,” www.cfainc.org/articles/legislative/legislation-review02.html); nonprofit organization called Citizens for Humane Animal Practices formed to fight the Akron law (USA Today.com, “Ohio city council considers electronic tracking of cats,” Feb. 10, 2004).

⁶¹ Lawsuit filed by Animal Legal Defense Fund and six Akron residents with cats (Animal Legal Defense Fund [Akron, Ohio], pub. 10/27/03, www.aldf.org/article.asp?cid=249).

⁶² Akron referred to by Florida resident as having “a national reputation for using the most ineffective, expensive and morally reprehensible means of dealing with feral cats,” (Letter to the Editor, *Miami Herald*, December 21, 2003); Akron website’s message board closed down due to deluge of angry emails from around the world (Sangiacomo, *supra*, *Cleveland Plain Dealer*).

⁶³ Summit County Executive Director James McCarthy “has blamed Akron’s cat law for worsening shelter problems,” (Abraham, Lisa, “Animal Shelter Review Approved – Summit County will bring in national experts to evaluate the troubled program,” *Akron Beacon Journal*, Jan. 23, 2004).

⁶⁴ Levy, p. 381.

- **Trap-and-remove**

Compassionate callers reporting feral cats often initially seek the adoptive placement of the cats or their relocation to a safer place. This “trap-and-remove” approach is impractical on a large scale. Socialization of feral cats is an uncertain process, and even if the time and resources existed to implement socialization on a widespread basis, there are not enough available homes for them. As it is, completely tame cats already in city shelters and up for adoption are regularly euthanized for lack of space. Regarding relocating the cats, Dr. Slater writes, “Transfer to a new location is rarely recommended because finding a suitable site can be difficult, time consuming, and stressful for the cats and often has low survival rates at the new site.”⁶⁵

Furthermore, trap-and-remove creates the same vacuums in the original territory as trap-and-kill and so will likewise have no long-term impact on feral population levels.

- **Do nothing**

The growth of an uncontrolled feral cat population, as with any wild species, will level off when the cats exceed the capacity of the habitat. Beyond capacity, population control comes in the form of starvation and disease.⁶⁶ The problems associated with unneutered feral cats remain. Usually, doing nothing, “results in continued breeding, increased cat mortality, continuing complaints by those near the colony, public health concerns, animal welfare concerns (often generated by high kitten mortality rates), and eventual financial costs in personnel, transportation, and euthanasia to animal care and control agencies and local governments.”⁶⁷

The latter passage accurately describes the present situation in much of *[your community]*.

Issues Surrounding Trap-Neuter-Return

- **Wildlife Predation**

Despite its proven track record for reducing feral cat populations and animal control costs, and despite the lack of any effective alternatives, TNR is still controversial. Much of this controversy can be traced to concerns that feral cats are responsible for a disproportionate amount of predation on birds and other forms of small wildlife. The American Bird Conservancy, sponsor of the “Cats Indoors!” campaign, claims feral cats, “are efficient predators estimated to kill hundreds of millions of native birds representing 20-30% of the prey of free-roaming cats, and countless small mammals, reptiles, and amphibians each year...”⁶⁸ The argument goes that by returning feral cats to their

⁶⁵ Slater, p. 12.

⁶⁶ Clifton, Merritt, “Street Dog & Feral Cat Sterilization and Vaccination Efforts Must Get 70% or Flunk,” *ANIMAL PEOPLE*, Oct. 2002.

⁶⁷ Slater, p. 15.

⁶⁸ American Bird Conservancy’s Resolution on Free-Roaming Cats, www.abcbirds.org/cats/resolution.pdf

territory, TNR encourages this predation to continue and so should be outlawed for the protection of wildlife.⁶⁹

The American Bird Conservancy's position suffers from two key defects. First, no reliable studies support the predation levels being claimed and none identify feral cats as a contributing factor to the decline of any bird or wildlife species. Second, TNR does not encourage but actually discourages predation – in the long run, by reducing the feral cat population in a given area, it reduces whatever level of predation already existed

Available research does not support the conclusion feral cats have a species level impact on bird or wildlife populations

Studies that claim feral cats are responsible for substantial numbers of bird deaths over wide geographical areas, like a state or an entire country, are based on insufficient data and highly questionable extrapolations, and have been repeatedly discredited.⁷⁰ One example is the oft-cited study of predation by cats conducted in a village in the English countryside.⁷¹ The researchers counted the number of prey brought home by 77 cats. Based on this one small sample, they projected a total of 70 million prey by Britain's entire free-roaming cat population, with birds accounting for 30 to 50 percent of the catch.⁷² Extrapolating from one non-randomly selected village to the whole of Great Britain lacks all scientific validity.⁷³ Yet this and similar small-scale studies have been repeatedly subjected to extrapolation and have been sensationalized.⁷⁴

Dr. Gary J. Patronek, DVM, Ph.D., commented on the use of unreliable extrapolations to quantify cat predation as follows:

If the real objection to managed colonies is that it is unethical to put cats in a situation where they could potentially kill any wild creature, then the ethical issue should be debated on its own merits without burdening the discussion with highly speculative numerical estimates for either wildlife mortality or cat predation. Whittling down guesses or extrapolations from limited observations by a factor of 10 or even 100 does not make these estimates any more credible, and the fact that they are the best available data is not sufficient to justify their use when the consequences may be extermination for cats.⁷⁵

⁶⁹ Ibid.; see also Wildlife Society's Policy Statement on Feral and Free-Ranging Domestic Cats, www.wildlife.org/policy/index.cfm?tname=policystatements&statement=ps28

⁷⁰ "Many studies indicate that claims about wildlife mortality due to cat predation are overblown, not based on data or scientific study, or are extrapolated to dissimilar populations or environments." *The Animal Policy Report*, p. 1, Tufts University School of Veterinary Medicine, March 2000.

⁷¹ Churcher PB, Lawton JH, "Predation by domestic cats in an English village," *J Zool (London)* 1987; 212:439-455; Churcher PB, Lawton JH, "Beware of Well-Fed Felines," *Natural History* (July 1989) 98(7): 40-46.

⁷² Ibid.

⁷³ Slater, p. 34; see also Elliot, J., "The Accused," *The Sonoma County Independent* (March 3-16, 1994) [criticizing extrapolations made by Churcher and Lawton], article excerpted at: www.stanford.edu/group/CATNET/articles/understd_pred.html;

⁷⁴ Slater, p. 34.

⁷⁵ Letter to Editor, *Journal of the American Veterinary Medical Association*, Vol. 209, No. 10 (November 15, 1996).

The use of small-scale, non-random studies by the American Bird Conservancy and other organizations to make the case that feral cats are killing hundreds of millions of birds annually in the United States and negatively impacting entire species amounts to no more than sheer propaganda. “In mainland ecosystems, no published data have shown that cats have a detrimental impact on wildlife populations of particular species.”⁷⁶

The American Bird Conservancy’s claim that birds make up 20 to 30 percent of a free-roaming cat’s diet is also based on misinterpretation of several studies.⁷⁷ The assertion is “misleading, inflammatory, self-serving, and undeserving of the repetition it has received in the media.”⁷⁸ To the contrary, reputable studies have repeatedly demonstrated that birds are a relatively small percentage of a feral cat’s diet, which relies much more on ground mammals when they’re available.⁷⁹

Further pointing to the complexity of the issue is a recent study by Britain’s Royal Society for the Protection of Birds. The study was designed to determine the causes of the decline of Britain’s most common garden birds. It was found that cats and magpies preyed on robins, chaffinches, collared doves and wood pigeons, but these bird species were actually rising in number.⁸⁰ This study, as well as others, demonstrates that predation alone does not necessarily have a negative impact on the total prey population.⁸¹

Factors that have been reliably demonstrated to significantly contribute to the decline of bird and wildlife species include, foremost, habitat destruction, then also pollution, competition from other bird species, and predators such as raccoons and opossum.⁸² Effectively exonerating cats is an exhaustive study of the causes of migratory bird decline in the United States published in the spring of 2003 by David I. King of the USDA Forest Service Northeastern Research Station and John H. Rappole, a research scientist with the Smithsonian Conservation and Research Center.⁸³ The study was commissioned by the Defenders of Wildlife,⁸⁴ a prominent national organization whose mission is the protection of native wild animals and plants in their natural environments.

The researchers, after reviewing annual bird census data and 36 earlier studies, reached three important conclusions: (1) the migrant bird populations have declined in numerous species, (2) the most threatened group of species are long distance migrants, and (3) the most important threat to migrants is the destruction of breeding, stopover and, especially, winter tropical habitat.⁸⁵ Specifically, they identified 106 different types of

⁷⁶ Ibid.

⁷⁷ Berkeley, pp. 137-138.

⁷⁸ Berkeley, p. 137.

⁷⁹ Coman, Brian J. and Brunner, Hans, "Food Habits of the Feral House Cat in Victoria," *Journal of Wildlife Management* 36:3 (1972) 848-853; Fitzgerald BM. Chapter 10: "Diet of domestic cats and their impact on prey populations," in: Tuner DC, Bateson P, eds. *The domestic cat*. Cambridge: Cambridge University Press, 1988;123-147.

⁸⁰ "Cats in Clear re: Birds," *Best Friends*, July/Aug. 2004.

⁸¹ See "Predation by house cats, *Felis catus*, in Canberra, Australia. I. Prey composition and preference," *Wildlife Research* 1997, 24:263-277 & H. "Factors affecting the amount of prey caught and estimates of the impact on wildlife," *Wildlife Research* 1998, 25:475-487.

⁸² Slater, p. 34.

⁸³ King, D., Rappole, J., *Population Trends for Migrant Birds in North America: A Summary and Critique*, www.defenders.org/wildlife/new/birds.html (2003)

⁸⁴ www.defenders.org/wildlife/new/birds.html.

⁸⁵ Ibid.

migrant birds and listed the proposed or documented causes for the decline of each. Loss of habitat was by far the cause listed most often. Other causes included human disturbance of breeding sites, pesticides, poisons, and hunting. "Cats" was not listed once.⁸⁶ At least one wildlife author has concluded this study indicates that, "[W]indows, cats, West Nile virus, wind turbines — all those specific causes of death that are apparent in people's backyards -- are not, at present, having any known effect on the population size of any continental bird species."⁸⁷

Further support for the position that feral cats do not have a significant impact on bird species comes from the most recent issue of Audubon, the magazine published by the National Audubon Society. The Sept./Oct. issue contains a report entitled, "State of the Birds 2004." According to the magazine, "Audubon's science team has pooled the best data available since Silent Spring to report on [the nation's birds'] overall health."

The report opens with an article by Greg Butcher, Audubon's director of bird conservation. He writes that, "Threats to avian life in the United States are many, but the most serious is the outright loss of habitat due to expanding agriculture, the clear-cutting of forests, the draining of wetlands, and sprawl."⁸⁸ Mr. Butcher also states that, "...birds here face other perils, as well. Climate change, air and water pollution, pesticides, and collisions with buildings, towers, and wind turbines also take a toll."⁸⁹

Notably, Mr. Butcher does not cite cats as posing a risk to bird species. The only specific mention of cats in the entire State of the Birds 2004 report is in an article entitled "What You Can Do," in which the common sense advice of keeping pet cats indoors is given.

The National Audubon Society's conclusions are consistent with all available research that is regarded as reliable and credible and which concludes feral cats do not have a species-wide impact on any birds or wildlife. The Audubon's director of bird conservation would not fail to mention feral cats as a risk to bird species if he agreed with the American Bird Conservancy's claim that these cats are killing hundreds of millions of birds annually. The Audubon report points to the limited scope of the predation issue, which in truth involves select, isolated sanctuaries and wildlife habitat and not the vast majority of cities, towns and rural settings where feral cats live.

TNR reduces rather than encourages predation

Rather than encouraging predation, TNR can actually aid in the protection of wildlife and bird interests. It must be kept in mind that before any TNR work is done at a given site, the cats are already there, preying upon other species to whatever extent they do. If the cats are then neutered, returned and monitored by a caretaker, reproduction ceases and the population goes down over time, with the fewer cats leading to less predation.

The American Bird Conservancy argues wildlife would be best protected if the first step of trapping is taken, but not the second of return. Euthanasia, they believe, is a more

⁸⁶ Id. (contained in appendix 3 of the King & Rappole report).

⁸⁷ Yakutchit, Maryalice, "Plight of the Vanishing Songbirds," *Defenders of Wildlife Magazine*, Spring 2003; www.defenders.org/defendersmag/issues/spring03/plightsongbird.html.

⁸⁸ Butcher, G., "The Big Picture," Audubon State of the Birds 2004, Audubon, Vol. 106, No. 4 (Sept.-Oct. 2004).

⁸⁹ Ibid.

acceptable solution.⁹⁰ This amounts to no more than advocacy of the trap-and-kill method and suffers from all its flaws – the vacuum effect of cats migrating into newly vacant habitat to take advantage of food sources, the over breeding of any cats in the colony left behind, the lack of adequate animal control resources, and the opposition of caretakers to trapping efforts.

What many bird and wildlife advocates fail to come to grips with is the impossibility of quickly ridding the environment of feral cats in order to protect other species – it simply cannot be done. The only known way to eliminate feral cat colonies, as has been accomplished in Newburyport, is gradually through the TNR process. In Newburyport, where 300 feral cats resided twelve years ago, there are now 17. Plainly, whatever predation existed in 1992 is far lower now. The return of the neutered ferals was not an encouragement for more predation – it was part of the method for permanently lowering the cats' numbers.

Ironically, and sadly, groups like the American Bird Conservancy are actually harming their own interests by opposing the only known method of feral cat control with any reasonable chance of success. By advocating what amounts to either “trap-and-kill” or “trap-and-remove” instead of TNR, they help perpetuate the failed methods of the past – the methods which have led to a national overpopulation of feral cats in the tens of millions. To protect the birds, new approaches and open minds are needed.

It's also important in considering the predation issue to draw a distinction between two very different situations that the current debate tends to muddle together. It's one thing if the particular site in question serves as a unique and critical habitat for wildlife, especially endangered species or migrating birds who might be vulnerable to a cat attack because of factors like their ground-nesting behavior. In those situations, humane alternatives to TNR such as relocation must be considered. It's another thing if the geographical area in question is an entire city or town. Simply because TNR might not be appropriate in a bird sanctuary doesn't mean it should be rejected for all of *[your community.]*

- **Public Health**

From the perspective of public health, feral cats and TNR touch upon three major issues: (1) rabies, (2) other zoonotic diseases, and (3) rat abatement. An examination of these issues demonstrates that on balance, the public health benefits of maintaining neutered, rabies-vaccinated feral cats in their environment through TNR far outweigh any possible public health threats.

Rabies

In 2001, according to the Centers for Disease Control and Prevention (CDC), wild animals accounted for 93% of reported cases of rabies in the United States. Among wild animals, the leading species were raccoons (37.2% of all animal cases in 2001), followed by skunks (30.7%), bats (17.2%), foxes (5.9%) and other wild animals, including rodents (0.7%). Only 6.8% of reported rabies cases were domestic animals.⁹¹ The total number

⁹⁰ American Bird Conservancy's Resolution on Free-Roaming Cats, www.abcbirds.org/cats/resolution.pdf

⁹¹ Krebs, J., Noll, H., Rupprecht, C., Childs, J., “Rabies surveillance in the United States during 2001,” *Journal of the American Veterinary Medical Association* 221(12):1690-1701 (2002): see www.cdc.gov.

of cases attributed to cats in 2001 was 270. Since 1975, there have been no reported cases of a cat transmitting rabies to a human in this country.⁹² Three large-scale exposures of humans to rabid or potentially rabid cats were reported from 1990 through 1996.⁹³ The risk that feral cats, who tend to be shy by nature and fearful of people, could transmit rabies to humans while at large is thus minimal judging by past experience.⁹⁴

The risk does exist to a greater degree in regions where rabies is prevalent among the local raccoon population. Raccoons often inhabit the same territory as feral cats. Most raccoon rabies occurs in the northeast/mid-Atlantic region (69.1% in 2001).⁹⁵ Most cat rabies occurs (214 of the 270 reported cases in 2001) in states where the raccoon-variant of rabies is present.⁹⁶ In 1999, it was discovered that, “Nearly all [rabid domestic] animals (229 cats and 78 dogs) were infected via spillover with the predicted terrestrial variant of the rabies virus, i.e., the variant maintained by and circulated in the dominant terrestrial reservoir species in the geographic location where the infection occurred.”⁹⁷ Consequently, “...feral cats may form an interface between wildlife reservoirs and humans.”⁹⁸

TNR can remove much of the opportunity for rabies to be transmitted from raccoons to feral cats and then to humans by having the cats vaccinated against the virus at the time of neutering. Vaccination of a large percentage of the feral cats in a given location may then create a barrier species for transmission of the virus from raccoons to humans: “By keeping a critical mass (usually 80 percent) of feral cats vaccinated against rabies in managed colonies, a herd immunity effect may be produced, potentially providing a barrier between wildlife and humans and preventing one of the major public health threats caused by feral cats.”⁹⁹

Using TNR to rabies-vaccinate the feral population also makes sense when the lack of suitable alternatives to remove the public health threat is considered. As discussed earlier, eradication of the feral population is not feasible. Trapping and removing a portion of the population results only in turnover, not diminishing numbers, and leaves the feral cat population unvaccinated and susceptible to rabies infection from raccoons. Doing nothing also leaves the ferals unvaccinated and fails to lessen the risk of rabies transmission from wildlife to cats to humans. A managed colony approach, where the cats are vaccinated, monitored on a regular basis and gradually diminish in number, is far more effective in removing the rabies threat.

Supporting the view that vaccinating the feral population can create a barrier against rabies for humans is past experience with domestic dogs. “[A]nimal control and vaccination programs begun in the 1940’s have practically eliminated domestic dogs as reservoirs of rabies in the United States.”¹⁰⁰ While feral cats may not be a reservoir for

⁹² Levy, p. 379.

⁹³ Slater, p. 32.

⁹⁴ Ibid.

⁹⁵ Krebs, J., Noll, H., Rupprecht, C., Childs, J., “Rabies surveillance in the United States during 2001,” *Journal of the American Veterinary Medical Association* 221(12):1690-1701 (2002): see www.cdc.gov.

⁹⁶ Ibid.

⁹⁷ Id.

⁹⁸ Levy, p. 385.

⁹⁹ Slater, p. 32.

¹⁰⁰ Krebs, J., Noll, H., Rupprecht, C., Childs, J., “Rabies surveillance in the United States during 2001,” *Journal of the American Veterinary Medical Association* 221(12):1690-1701 (2002): see www.cdc.gov.

rabies to the same magnitude that domestic dogs once were, widespread implementation of TNR could eliminate even the possibility of that happening. This is a matter of great significance as, “A single incident involving a case of rabies in a companion species can result in large expenditures in dollars and public health efforts to ensure that human disease does not occur.”¹⁰¹

The hands-on practice of TNR entails close interaction between feral cats and humans during the initial phase of trapping and neutering, potentially creating opportunities for bites and rabies transmission. Access to TNR services should, as a result, be conditioned upon training in safe handling techniques.

Other zoonotic diseases

A common misconception is that feral cats pose a health hazard through risk of transmission of other zoonotic diseases besides rabies. Available evidence indicates this is not true. For example, the 8000 acre campus of Stanford University is home to one of the oldest TNR programs in the country. The university-approved, but privately funded and operated program began operation in 1989.¹⁰² Subsequently, when a graduate student complained that the cats presented a health risk, campus administration took up the issue.¹⁰³ The Environmental Health & Safety Department of the university, in consultation with the Santa Clara County Health Department, “determined that there is a general consensus that feral cats pose little health and safety risk to individuals on campus.”¹⁰⁴ The Stanford TNR program continues to the present date, claiming reduction of the feral population from a total of 1500 cats at inception to 200 currently.¹⁰⁵

A transmissible disease often associated with cats is toxoplasmosis which is caused by a common parasite (toxoplasma) probably already found in more than 60 million people in the United States.¹⁰⁶ Very few people display symptoms, but infection can be serious in pregnant women and those with compromised immune systems.¹⁰⁷ The parasite can be transmitted through the accidental ingestion of contaminated cat feces, but infection is more commonly the result of eating or handling raw meat, or gardening.¹⁰⁸ A study conducted in Norway found that living in a neighborhood with cats is not by itself a risk factor for contracting toxoplasmosis.¹⁰⁹

Plague can be transmitted by feral cats who catch the disease from infected fleas, but this concern appears to be geographically limited to the southwestern United States.¹¹⁰ In these regions, flea control and care in handling feral cats with symptoms of pneumonia is recommended.¹¹¹

¹⁰¹ Ibid.

¹⁰² <http://www.stanford.edu/group/CATNET/about.html>

¹⁰³ Correspondence from Carole Miller, co-founder of Stanford Cat Network, April 29, 2002.

¹⁰⁴ Letter from Gary W. Morrow, Biosafety Officer and General Safety Manager, Environmental Health and Safety Dept., Stanford University, Nov. 24, 1992.

¹⁰⁵ <http://www.stanford.edu/group/CATNET/about.html>

¹⁰⁶ www.cdc.gov/healthypets/animals/cats.htm

¹⁰⁷ Ibid.

¹⁰⁸ Id.

¹⁰⁹ Slater, p. 33, citing Kapperud, G., et.al., “Risk factors for *Toxoplasma gondii* infection in pregnancy; Results of a prospective case-control study in Norway,” *American Journal of Epidemiology* 144: 405-412, (1996).

¹¹⁰ Slater, p. 33.

¹¹¹ Ibid.

“Cat scratch fever,” caused by the bartonella bacteria, is relatively common, although it is not clear the risk factor is any higher with the feral cat population as compared to the domestic cat.¹¹² Given ferals’ wariness towards humans and their tendency to keep a distance, presumably the risk factor is lower for them.

Ringworm transmission requires physical contact with the cat and is most likely to be a problem only for caretakers fostering injured or ill feral adults, or fostering kittens.¹¹³

Transmission of roundworms to humans is another health risk mentioned in the literature, but is not unique to feral as opposed to domestic cats.¹¹⁴

When TNR succeeds in lowering free-roaming cat populations – which no other method has been shown to accomplish – then whatever risk exists of transmission of these diseases is lowered as well.

Rat abatement

The rat problem in most urban areas is chronic and growing. For example, according to recent statistics from the New York City Department of Health, complaints in that city about rats have risen 40% in the past two years.¹¹⁵ Complaints continued to rise in the past year despite significantly increased efforts at inspections and exterminations.¹¹⁶

The usefulness of feral cats in controlling rat populations is well documented. Roger Tabor, in his studies of London street cats, noted that one particularly adept tabby female was recorded as having caught 12,480 rats over a six year span (an average of 5 to 6 per day.)¹¹⁷ Farmers and stable owners have long employed feral cats for rodent control.¹¹⁸ Thomas Gecewicz, while serving as Director of Health for the city of Fall River, Massachusetts, found that a TNR’ed colony of feral cats at a local landfill resulted in a cost savings for rodent control.¹¹⁹ In Pennsylvania’s Longwood Gardens, feral cats “are part of the integrated pest management control program to protect certain plant life from damage by small rodents.”¹²⁰ One researcher, Paul Leyhausen, suggests that in urban environments where food sources such as garbage and rats cannot be permanently removed, “the feral cat population serves a very useful purpose and should rather be encouraged than fought.”¹²¹ Some researchers believe the Black Death during the Middle Ages in Europe was exacerbated when the disease was blamed on witches and their feline companions, causing cats to be exterminated and thereby reducing a significant control on the transmission of the disease from flea-infested rats.¹²²

TNR allows the cats to remain in the environment and continue to provide no-cost rat control, while at the same time stemming future population growth and curbing nuisance behavior such as noise and odor.

¹¹² Id.; www.cdc.gov/healthypets/animals/cats.htm

¹¹³ Slater, p. 33.

¹¹⁴ Ibid.

¹¹⁵ “City’s scurry worry: Rat complaints up despite crackdown,” *Daily News*, August 16, 2004.

¹¹⁶ Ibid.

¹¹⁷ Tabor, pp. 112-113.

¹¹⁸ Slater, pp. 38-39.

¹¹⁹ Correspondence, Thomas Gecewicz, July 16, 2004.

¹²⁰ Slater, p. 39.

¹²¹ Berkeley, p. 122.

¹²² Clifton, Merritt, “Where cats belong – and where they don’t,” *ANIMAL PEOPLE*, June 2003.

TNR has the Growing Support of Public Health Officials, Academics, Animal Control Officers and Animal Welfare Organizations

Thomas Gecewicz, who in addition to his service in Fall River also served as the Director of Public Health in Bridgeport, Connecticut from 2000 through 2004, writes: “I can unequivocally state that I, as a public health official, do openly endorse any and all trap, spay, and neuter programs as a public health benefit and cost savings to any community to which it is offered.”¹²³ Dr. Jonathan Weisbuch, M.D., the Chief Medical Officer for Maricopa County, states, “The effectiveness of TNR has been demonstrated by the Maricopa County Animal Care and Control Agency in resolving a complex problem of feral cats overpopulating the streets and alleys of 24 of the most populated cities and towns in Arizona. The program has reduced the number of strays, diminished the number of kittens and resulted in a managed community of felines that no longer stimulate the number of community complaints that were common prior to our initiating the program.”¹²⁴ Ron Cash, Director of Health for Atlantic City, New Jersey, has also found TNR to be a useful public health tool: “We serve a population of approximately 35 million people who visit this community every year. I need to operate a safe city for the tourists of Atlantic City. When we went shopping for a solution to the feral cat concerns in our community, we found TNR. TNR works.”¹²⁵

Dr. Slater concludes, “In communities where basic services are already available, support for feral cat caretakers (including education) and evaluation of options besides ‘wait and see’ or trap and euthanize should be seriously considered as long-term investments.”¹²⁶ Likewise, Dr. Levy states, “TNR has emerged as one viable alternative for nonlethal cat control capable of reducing cat populations over the long term.”¹²⁷ Dr. James Ross, DVM, a Distinguished Professor at Tufts University, concurs: “My experience with feral cat control using the trap, neuter, release (TNR) method in the British Virgin Islands has been very positive. It is a humane way to control the feral cat population. I endorse it in most of the ecosystems I’ve experienced.... I trust you will find it as useful as I and others have.”¹²⁸

Ed Boks, current executive director of Animal Care & Control of New York City and former head of Maricopa County Animal Care & Control, is an enthusiastic supporter of TNR. Mr. Boks has stated that TNR is, “the only viable, non-lethal, humane and cost effective solution to our communities’ feral cat problem....”¹²⁹ In Dallas, Texas, Kent Robertson, manager of Dallas Animal Services, fully endorses TNR and works with local feral cat groups to implement the method: “TNR is much better than killing cats! I hate

¹²³ Correspondence, Thomas Gecewicz, July 16, 2004. Mr. Gecewicz also served as Director of Health in Braintree, Mass., from 1977 through 1990, and as Executive Health Officer in Braintree from 1996 through 1999.

¹²⁴ Correspondence, Jonathan Weisbuch, July 16, 2004.

¹²⁵ “The Humane Solution: Reducing Feral Cat Populations with Trap Neuter Return” [video], Alley Cat Allies, 2001.

¹²⁶ Slater, p. 76.

¹²⁷ Levy, p. 387.

¹²⁸ Correspondence, James Ross, July 16, 2004.

¹²⁹ *AC&C Newsletter*, April 2004, Vol. 1, Issue 2, p. 5.

doing that, but I didn't know what else to do.”¹³⁰ In Seattle, Don Jordan, executive director of the Seattle Animal Shelter, has also turned his animal control agency towards TNR. “Based on the studies out there, we have to take a more active role in helping to manage feral cats. Communities must recognize that there is value in getting populations fixed and stable. This problem is not going to go away unless we all become involved.”¹³¹

The ASPCA, a powerful force for animal welfare and one of the nation's oldest and most respected animal organizations, promoted TNR in a cover story for the Fall 2003 edition of its magazine, *Animal Watch*¹³² and runs its own thriving TNR program in New York City.¹³³ **[Mention any known and respected animal welfare organizations in your region which openly support TNR. Examples might include the San Francisco SPCA or the Tompkins County SPCA (NY).]**

Conclusion

A feral and stray cat overpopulation crisis is now underway in our community, resulting in overcrowded shelters, high euthanasia rates, quality of life complaints and financial burdens. The methods of the past – a mixture of trap-and-kill and doing nothing – have had no impact. Even if the resources were available for animal control to attempt a wholesale removal of the cats, which they're not, the effort would fail due to feral population dynamics and public opposition. Trap-Neuter-Return alone holds out the possibility of turning the crisis around, stemming the flood of homeless cats into shelters, lowering costs and resolving complaints.

Therefore, it is respectfully requested that Trap-Neuter-Return be endorsed as official policy for **[your community.]**

¹³⁰ *Alley Cat Action*, Summer 2004, p. 5.

¹³¹ *Id.* at p. 6.

¹³² Commings, Karen, “TNR: The Humane Alternative,” *ASPCA Animal Watch* (Fall 2003).

¹³³ See www.aspc.org/tnr

Appendix 1



ASPCA STATEMENT ON TRAP-NEUTER-RETURN

The ASPCA supports Trap-Neuter-Return (TNR) as the most humane and effective strategy for managing the feral cat population. The ASPCA Cares program, launched in 2001, operates mobile spay/neuter vans that serve pet owners, shelters and rescuers in New York City's five boroughs. In 2003, over 1,600 feral cats were spayed/neutered as part of the ASPCA Cares TNR initiatives. In addition to providing free surgeries for feral cats, ASPCA Cares ensures that all cats are vaccinated against rabies at the time of surgery, and ear-tipped to clearly identify their status as sterile, healthy cats. The program also maintains a bank of humane traps, which are loaned to rescuers at no charge. Hundreds of local feral cat caretakers have been trained to practice TNR in feral cat workshops taught by Neighborhood Cats Inc. at the ASPCA headquarters. In addition, ASPCA Cares has augmented this training with on-going workshops in feral kitten socialization to help rescuers socialize and re-home the offspring of feral cats. This facilitates the reduction in size of feral colonies.

TNR is an integral part of the ASPCA's long-term strategy to end the euthanasia of adoptable animals in New York City. It is our goal to increase the number of cats spayed/neutered via our mobile clinics by the end of 2004 and to continue promotion of TNR with hands-on assistance. This will include on-going participation in large-scale collaborative projects such as the successful spay/neuter of 250 cats living at the city's correctional facility on Rikers Island in 2002, among others.

August 12, 2004