

September 3, 2015

District Department of the Environment
Fisheries and Wildlife Division
1200 First Street NE, 5th Floor
Washington, DC 20002



Re: Wildlife Action Plan

On behalf of the Washington Humane Society (WHS) and our 20,000+ supporters, I would like to submit this statement as part of the public comment for the District of Columbia Wildlife Action Plan 2015 Update (the Plan).

WHS strongly opposes the proposed language regarding TNR in the District of Columbia Wildlife Action Plan 2015 Update. Our current law, the DC Animal Control Code §8-1802, specifically promotes the reduction in euthanasia and the utilization of “trap, vaccinate, spay or neuter and return practices as a means of controlling the feral cat population”. In 2007, the year before the law making TNR the official policy of the District was enacted, 3,935 cats were killed under assumptions similar to those outlined in Chapter 4 Section 4.6.2 and Chapter 6 Section 6.4.1 of the District of Columbia Wildlife Action Plan 2015.

Since implementing humane control practices for the free ranging cat population, WHS has seen a 78% increase in the number of healthy cats leaving our facilities. We have seen a corresponding decrease of 71% in euthanasia rates. Most significantly, there has been a decline in our free roaming cat intake of 17% from 2011 to 2014. This is particularly important as we are the only agency in the District that shelters and measures statistics for free roaming cats. We stand firmly behind these results as evidence that a strong TNR program lowers the unnecessary killing of healthy animals. Our declining intake data makes the case that TNR is indeed an effective method of controlling the free roaming cat population.

In Chapter 4 Section 4.6.2 the Plan states that “Free ranging cats kill an estimated 1.3-4.0 billion birds and 6.3-22.3 billion small mammals in the United States annually.” The references used to substantiate the figures all originate from the Loss, Will and Marra 2013 paper, “The Impact of Free Ranging Domestic Cats on Wildlife in the United States” (Loss, Will and Marra, 2013). This article has been roundly criticized for its lack of reliable statistical methods for analyzing, contrasting, and combining different studies (Matthews, 2013). When using a small sample size as Loss, Will and Marra did to arrive at results, meta-analysis would be used by most scholars to produce a smaller estimation error and normalize results of dissimilar studies (Matthews, 2013). The failure to utilize meta-analysis calls to question the validity of the published results.

The Plan does not refer to data that measures what is happening to bird and small animal populations in the District; as far as we are aware, no such studies have yet been conducted.

In addition to the lack of reliable scientific data to support the claim that cats kill over 1 billion birds per year as asserted in Chapter 4, Chapter 6 Section 6.4.1 identifies cats as an invasive species based upon the Invasive Species Specialist Group's "100 of the World's Worst Invasive Alien Species, A Selection From the Global Invasive Species Database." This report's use as a source is questionable as the data is not specific to the United States or the District of Columbia. Furthermore the District of Columbia Wildlife Action Plan 2015 fails to address any of the other of the World's Worst Invasive Alien Species in our community such as squirrels and rabbits. Given cats' long history of living with humans, the Federal Government has omitted free-ranging cats from its definition of "injurious, non-indigenous wildlife", which is at odds with the position of the DC Department of the Environment (Gorman & Levy, 2004).

I was particularly concerned about the allegation made in Chapter 6 Section 6.4.1 that "TNR animals are often released on National Park Service property and into prime wildlife habitats." This is simply untrue. As the leading TNR group in the District, WHS does not "release" cats in these locations, but instead returns cats back to the communities that care for them. It's particularly important to note that WHS is not introducing cats into new areas. Rather, we are collecting animals where they are already living and bringing them to our facilities to provide important services such as basic veterinary care, vaccines, and sterilization – at no cost to the District government or its taxpayers – and then returning the cats to the areas where they were found.

The suggestion that "free-ranging cats" could be "taken in by several adoption facilities operating in the District" is misleading. Our shelter at 1201 New York Avenue NE is the only facility in the District which will accept stray cats; there is not a plethora of 'adoption facilities.' What is left unsaid is what would happen to those animals. Free-ranging cats are challenging to adopt as they are not well socialized. Truly feral cats, who are even further down the socialization continuum, cannot be adopted as they are unsocialized with people. Prior to TNR as a strategy for managing the urban cat population, healthy free ranging cats were captured and killed because they could not be successfully adopted.

Over the years it has been proven through countless studies that the impact of euthanizing millions of cats each year has an insignificant impact on the problem of animal predation (Hurley, 2013). The District would have to kill 50% of the cat population to experience a long term decline (Hurley, 2013). The District would likely find it difficult to gain public support for a program designed to kill cats. TNR is consistent with the community's desire for the non-lethal management of free-ranging cats; in our daily interactions with the citizens of the District – tens of thousands of interactions each year – the vast majority applaud a non-lethal means to manage the cat population. The sentiment is evidenced throughout the country by the number of people and organizations dedicated to support TNR programs.

In addition to my leadership role at WHS, I have served as the President of the National Federation of Humane Societies, and have a firm grasp of programs that are working throughout the nation. In January of 2014 I was part of a small group of industry leaders convened by the ASPCA to study best practices for managing cat populations in communities. This group, comprised of representatives from virtually all of the largest animal protection organizations (including those who serve domestic animals, farm animals and wildlife), identified TNR as the best practice. Washington, DC, is regularly cited as a community with progressive and insightful animal welfare practices; ending TNR and returning to the ineffective practices of past centuries would be a significant regression.

In summary, the Plan would seem to suggest one of two outcomes for free ranging cats: leaving the cats where they are, to breed robustly and unchecked, and therefore contribute to a greater overpopulation problem; or rounding them up and killing them. There is no third way. Taking them to an 'adoption facility' to be adopted is fantastical; as the long-time experts in this region we can assure you that the significant majority of long-term outdoor cats cannot be converted into pets. No one would wish that more than we do, but it is simply not the case.

We will continue to explore ways to manage and conserve the District's diverse animal population. As the organization responsible for both domestic animals and wildlife in the District, we are continuously advancing programs employing best practices that benefit the community of humans and non-humans alike.

WHS believes that based on science, public values and a humane ethical obligation, the current draft of the District of Columbia Wildlife Action Plan 2015 needs to be revised to identify and implement non-lethal means of addressing concerns regarding the bird and cat populations. The Washington Humane Society would look forward to working in partnership with the District Department of the Environment to develop a Wildlife Action Plan that would allow for a collaborative solution that will meet the community's needs and desires. Approaches could include a long-term quantitative study of TNR programs in DC; collaborative efforts to promote cats living indoors; advancing education on responsible cat ownership and increasing the availability of low cost/free spay and neuter services. We stand ready to work with you toward these ends.

My sincere regards,

WASHINGTON HUMANE SOCIETY

A handwritten signature in black ink, appearing to read 'Lisa LaFontaine', written in a cursive style.

Lisa LaFontaine
President and Chief Executive Officer

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