



March 11, 2024

The Honorable Deb Jung, Chair
Members of the Howard County Council

Dear Ms. Jung and Council Members:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) and our thousands of members and supporters in Howard County. We've heard from many of them who are troubled by the introduction of [Bill No. 13-2024](#), which proposes to legalize the abandonment of domestic cats when done under the guise of trap, neuter, and release (TNR) operations and to limit county animal control authorities' ability to address resident complaints about outdoor roaming cats. We hope the information herein is useful as you weigh the issue, and we **urge you to withdraw the proposed ordinance.**

Advocates of TNR routinely mislead officials into believing that all cats in a community can and will be captured, vaccinated, and sterilized by volunteers and that the practice will eventually reduce the number of homeless and feral cats. **Neither is true.** Many cats are missed or prove too difficult to trap. Unpaid individuals can't realistically be relied on to follow through with such a resource-heavy, time-consuming, labor-intensive, and long-term project. Cat populations also change in dynamics and grow rapidly—and when unsterilized, exponentially—as residents abandon unwanted cats at colonies, mistakenly believing that they'll be looked after.

The **National Association of State Public Health Veterinarians** notes the following:

[N]o evidence exists that maintained cat colonies adequately reduce human public health risks or appropriately address their impact on pets or native wildlife. Several reports suggest that support of “managed cat colonies” may **increase the public's likelihood of abandoning unwanted pets in lieu of more responsible options.**¹ [*Emphasis added.*]

PETA is an animal protection organization, so [our opposition to TNR programs](#) arises from animal welfare concerns. Cats are domestic animals, whether they're socialized or not, and they don't survive long outdoors. (Veterinary [experts estimate](#) that homeless cats live for an average of less than three years, a fraction of the 12- to 20-year life expectancy of an indoor cat.)

“Natural attrition” is the euphemism used by TNR proponents to describe the deaths of homeless cats left to fend for themselves outdoors. Like other open-admission animal shelters across the country, PETA is regularly called to help stray and feral cats found with eyeballs hanging out of their sockets, eyes and

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

Washington, D.C.
1536 16th St. N.W.
Washington, DC 20036
202-483-PETA

Los Angeles
2154 W. Sunset Blvd.
Los Angeles, CA 90026
323-644-PETA

Norfolk
501 Front St.
Norfolk, VA 23510
757-622-PETA

Berkeley
2855 Telegraph Ave.
Ste. 301
Berkeley, CA 94705
510-763-7382

Info@peta.org
PETA.org

Affiliates:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)

¹National Association of State Public Health Veterinarians, “Free-Roaming/Unowned/Feral Cats,” Position Statement, September 1996, <http://www.tnrrealitycheck.com/media/NASPHV.pdf>

noses crusted shut from upper respiratory infections, tails and legs stripped of skin after attacks by other animals, and ears turned into a bloody pulp from scratching at untreated ear mites.

Others are found wasting away from feline AIDS or leukemia. Like the cats we consider companions and keep indoors to protect them, cats abandoned outdoors also suffer from **hidden ailments**, including urinary tract infections, urinary blockages, and organ failure but are deprived of adequate veterinary care. *These animals are biologically identical to the cats who share our homes* and who receive regular veterinary care to prevent and treat diseases and parasites. **Cats who've been sterilized and abandoned outdoors aren't "saved."** They still die—typically [violently and after prolonged suffering](#).

We also receive reports about cats who are perceived to be a nuisance and have been intentionally harmed and/or killed by frustrated or hostile residents. While TNR proponents use marketing terms like “community cats,” many, if not most, people do not welcome the presence of roaming cats on or around their property. Even with caretakers and rigorously enforced guidelines, cats left abandoned outdoors can and do come to harm. Recently in Arizona, numerous homeless cats—who'd been sterilized and “released” by a group of people—were [found injured or dead](#) after they were evidently shot with a BB or pellet gun. In Florida, three homeless cats who'd been sterilized and reabandoned by a group were found [“dead—with their heads apparently bashed into concrete.”](#) In West Virginia, numerous homeless cats who'd been fed in a neighborhood were [“found dead, all showing signs they may have been poisoned.”](#) And in Texas, a woman who fed a “colony” of approximately 50 homeless cats at a park said that all but five or six of the animals had been poisoned and [endured “a horrible, slow death that I wouldn't wish on anyone.”](#)

In Havre de Grace, Maryland, a cat who was part of a colony fed by members of a TNR group was found dead with “visible injuries.”² A note was left next to the animal that read, “The cats must go.”³ A spokesperson for the group said that another cat who had been fed at the location had been shot with a BB gun and that others had been poisoned. These are just a few of the countless cases we track. **As domesticated animals who depend on humans for basic necessities of life and safety, cats are at risk when left outdoors to fend for themselves.**

Populations of homeless, roaming cats also pose a risk to public health. **The Maryland Department of Health** concurs with the **Centers for Disease Control and Prevention** and reports that “cats are the most frequently identified rabid domestic animal.”⁴ The near impossibility of re-trapping cats to provide them with legally required rabies vaccinations is one reason why free-roaming cat populations [have been identified](#) as a significant public-health threat.

A cat who'd been sterilized, **vaccinated**, and abandoned as part of a TNR operation in Florida bit a resident who was trying to help the suffering animal. [The cat tested positive for rabies](#), and the resident required post-exposure treatment. After a rabid cat was

²Elizabeth Janney, “HdG Cat Killer Focus of Animal Cruelty Investigation,” Patch.com, February 13, 2017, <http://patch.com/maryland/havredegrace/hdg-cat-killer-focus-animal-cruelty-investigation>.

³*Ibid.*

⁴Maryland Department of Health, “Rabies,” Health.Maryland.gov, <https://health.maryland.gov/phpa/OIDEOR/CZVBD/pages/rabies.aspx>.

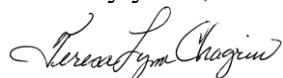
recently found in Ellicott City, Yahoo.com reported that “[t]he county health department advises residents against feeding any stray or feral animals, including leaving food dishes outside.”⁵ Last month, an aggressive rabid feral cat was found near an elementary school in [Frederick County](#), and last summer a rabid cat in [Cecil County](#) attacked at least two people.

Struggling native wildlife also don’t stand a chance against roaming cats. **The Maryland Invasive Species Council**, which includes representatives from several state and federal agencies, including the U.S. Department of the Interior, the U.S. Department of Agriculture, the Maryland Department of Agriculture, and the University of Maryland, reports the following:

[S]mall cats are not part of the native food web in North America and can wreak havoc on an ecosystem. ... Feral cats can take a toll on native wildlife, decimating populations already under stress due to habitat shrinkage. ... Supplemental feeding of feral cats is not an answer. Even well-fed feral cats will capture and kill, but not always eat, their prey.⁶

PETA is concerned about cats and wildlife alike, and we hope you’ll consider wildlife, too. We stand ready to help in any way we can to aid the county in passing proven, effective ordinances and establishing programs to address animal protection and public safety in your community. I can be reached at 443-320-1277 or TeresaC@peta.org. Thank you for all your hard work for the residents of Howard County.

Sincerely yours,



Teresa Chagrin
Animal Care and Control Issues Manager
Cruelty Investigations Department

Attachments

- PETA Flier: “Homeless Cats Are Not Super-Felines”
- PETA, “Important Briefing for Community Leaders on Trap, Neuter, Reabandonment (TNR) Programs”

⁵Jacob Calvin Meyer, “Rabid Feral Cat Found in Ellicott City, Howard Health Department Says,” Yahoo.com, April 14, 2021, <https://www.yahoo.com/now/rabid-feral-cat-found-ellicott-000600382.html>.

⁶MDInvasivesp.org, “Invasive Species of Concern in Maryland: Feral Cats,” April 2010, <https://mdinvasivesp.org/iotm/april-2010/#:~:text=Feral%20cats%20can%20take%20a,%2C%20amphibians%2C%20and%20even%20fish>.



Bringing back the birds

3/13/2024

Howard County Council
3430 Court House Drive
Ellicott City, MD 21043

Dear Chair Jung, Vice Chair Walsh, and Council Members:

On behalf of American Bird Conservancy and our members, I am writing to express our **opposition to CB13-2024, Trap-Neuter-Return Program – Establishment**. Trap, neuter, release (TNR) programs fail to reduce cat populations, while purposely re-abandoning and maintaining roaming cats outdoors, a practice that facilitates ongoing nuisances and harms in the community.

Scientific studies have overwhelmingly concluded that **TNR programs are insufficient to reduce cat populations** and may actually be counterproductive. Consider the following evidence:

- In a long-term study of two highly organized TNR programs in California and Florida, researchers found **ongoing cat population growth**, and data indicated that “no plausible life history variables would likely allow for TNR to succeed in reducing [cat] population size.”ⁱ
- A study of two TNR colonies in South Florida indicated that population size remained the same in one colony and actually increased in the other. The study authors concluded that TNR programs “are **not an effective method** to help control the population of unwanted feral and free-roaming cats.”ⁱⁱ
- A study evaluating ten years of intensive TNR in Rome, Italy, concluded that TNR programs were “not sufficient for managing urban feral-cat demography” and resulted in “a **waste of money, time, and energy**.”ⁱⁱⁱ
- A study in Oklahoma found that TNR was “**insufficient to reduce unowned cat populations**” after a 5-year TNR program resulted in “no significant change in free-ranging cat abundance.”^{iv}
- In an evaluation of cat management options, a study found that **TNR “was actually counterproductive”** to cat population management goals.^v

Roaming cats are also a serious public health risk. **Cats are the top source of rabies among domestic animals** in the United States and disproportionately expose more people to the deadly disease.^{vi,vii} An estimated 16% of rabies post-exposure prophylaxis in the U.S. is administered due to exposure from a cat.^{viii} This represents a significant financial, physical, and emotional burden. **Between 2001 and 2020 in Maryland, there were 23x more rabid cats than rabid dogs, and rabid cats accounted for 85% of all rabid domestic animals.** Although some TNR programs provide a single rabies vaccine to each “community cat,” this is insufficient protection. According to the National Association of State Public Health Veterinarians (NASPHV) Compendium on Animal Rabies Prevention and Control, every cat requires an initial vaccine, a follow-up vaccine after one year, and periodic vaccines at one- or three-year intervals to protect the cat and the public.^{ix} As a result of rabies risks, the NASPHV recommends that “**stray dogs, cats, and ferrets should be removed from the community.**”¹³

Cats are also a definitive host for the parasite, *Toxoplasma gondii*, that causes toxoplasmosis. The parasite can only sexually reproduce in the gut of a feline, and cats then excrete up to hundreds of millions of the parasite’s eggs into the environment. **All warm-blooded species, including humans, are**



Bringing back the birds

susceptible to this disease, which is the second leading cause of deaths from foodborne illness in the U.S.^x Infections in people may also result in blindness, memory loss, or even death and is associated with neuropsychiatric diseases such as schizophrenia.^{xi} **It is precisely because of risks of toxoplasmosis (e.g., miscarriage, intellectual disabilities) that pregnant women are advised not to change cat litter.**^{xii} TNR would result in the entire county becoming one giant litterbox.

TNR programs also endanger wildlife. Roaming cats are predators and one of the world's most harmful invasive species.^{xiii} Cats have contributed to the extinction of 63 species in the wild and are the leading source of human-caused bird deaths in the United States and Canada.^{xiv,xv} In the U.S. alone, cats are estimated to **kill 2.4 billion birds every year.**^{xvi} Even well-fed cats will hunt and kill wildlife.^{xvii} Enabling hordes of roaming cats, whether sterilized or not, is a death sentence for local wildlife.

Cat re-abandonment programs, such as **TNR, also expose communities to nuisances and the County to potentially serious legal liabilities.** Cats do not remain where you set them and often create problems for local residents, including property damage, spread of fleas and ticks, fouling garden beds, conflicts with pets, and disease transmission. Who wants a cat colony near their home? What happens if a resident is exposed to rabies or experiences property damage associated with these released cats? Additionally, many wildlife species are protected by a variety of state and federal laws, including the Migratory Bird Treaty Act and the Endangered Species Act. If a released cat "takes" a protected species, the County could be liable, as occurred in a case filed against the State of New York.^{xviii}

For all of these reasons and more, TNR is opposed by the following organizations:

[American Association of Wildlife Veterinarians](#) | [American Ornithologists' Union](#) | [Association of Avian Veterinarians](#) | [International Wildlife Rehabilitation Council](#) | [National Association of State Public Health Veterinarians](#) | [National Wildlife Rehabilitators Association](#) | [National Wildlife Federation](#) | [The Wildlife Society](#)

I appreciate your interest in reducing the stray and feral cat population. However, TNR is not an appropriate solution. **A better solution would be to remove these cats from the environment and to promote responsible pet ownership, such that cats never become stray or feral in the first place.**

I appreciate the opportunity to provide these comments on behalf of our members and would be happy to work with you to develop appropriate management solutions. **Please oppose CB13-2024.**

Respectfully,

Grant Sizemore, M.S.
Certified Wildlife Biologist®
Director of Invasive Species Programs

-
- ⁱ 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.
- ⁱⁱ 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.
- ⁱⁱⁱ Natoli E., L. Maragliano, G. Cariola, A. Faini, R. Bonanni, S. Cafazzo, and C. Fantini. 2006. Management of feral domestic cats in the urban environment of Rome (Italy). *Preventive Veterinary Medicine* 77: 180-185.
- ^{iv} Coe S.T., J.A. Elmore, E.C. Elizondo, and S.R. Loss. 2021. Free-ranging domestic cat abundance and sterilization percentage following five years of a trap-neuter-return program. *Wildlife Biology* 1: 1-8.
- ^v McCarthy R.J., S.H. Levine, and J.M. Reed. 2013. Estimation of effectiveness of three methods of feral cat population control by use of a simulation model. *Journal of the American Veterinary Medical Association* 243: 502-511.
- ^{vi} Gerhold R.W. and D.A. Jessup. 2013. Zoonotic diseases associated with free-roaming cats. *Zoonoses and Public Health* 60(3): 189-195.
- ^{vii} 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.
- ^{viii} Christian K.A., J.D. Blanton, M. Auslander, and C.E. Rupprecht. 2009. Epidemiology of rabies post-exposure prophylaxis--United States of America, 2006-2008. *Vaccine* 27: 7156-7161.
- ^{ix} Brown C.M., S. Slavinski, P. Ettestad, T.J. Sidwa, and F.E. Sorhage. 2016. National Association of State Public Health Veterinarians Compendium of Animal Rabies Prevention and Control. *Journal of the American Veterinary Medical Association* 248: 505-517.
- ^x Scallan E., R.M. Hoekstra, F.J. Angulo, R.V. Tauxe, M. Widdowson, S.L. Roy, J.L. Jones, and P.M. Griffin. 2011. Foodborne illness acquired in the United States—major pathogens. *Emerging Infectious Diseases* 17: 7-15.
- ^{xi} Aguirre A.A., T. Longcore, M. Barbieri, H. Dabritz, D. Hill, P.N. Klein, C. Lepczyk, E.L. Lilly, R. McLeod, J. Milcarsky, C.E. Murphy, C. Su, E. VanWormer, R. Yolken, and G.C. Sizemore. 2019. The One Health approach to toxoplasmosis: epidemiology, control, and prevention strategies. *EcoHealth* 16: 378-390.
- ^{xii} Centers for Disease Control and Prevention. Toxoplasmosis and Pregnancy FAQs, https://www.cdc.gov/parasites/toxoplasmosis/gen_info/pregnant.html (accessed 1/9/2019).
- ^{xiii} Lowe S., M. Browne, S. Boudjelas, and M. DePoorter. 2004. 100 of the world's worst alien invasive species: a selection from the Global Invasive Species Database. Invasive Species Specialist Group, Species Survival Commission, International Union for the Conservation of Nature. 12 pages.
- ^{xiv} Doherty T.S., A.S. Glen, D.G. Nimmo, E.G. Ritchie, and C.R. Dickman. 2016. Invasive predators and global biodiversity loss. *Proceedings of the National Academy of Sciences* 113: 11261-11265.
- ^{xv} North American Bird Conservation Initiative, U.S. Committee. 2014. The State of the Birds 2014 Report. U.S. Department of Interior, Washington, D.C. 16 pages.
- ^{xvi} 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. doi: 10.1038/ncomms2380
- ^{xvii} Loyd K.A.T., S.M. Hernandez, J.P. Carroll, K.J. Abernathy, and G.J. Marshall. 2013. Quantifying free-roaming domestic cat predation using animal-borne video cameras. *Biological Conservation* 160: 183-189.
- ^{xviii} Stipulation of Settlement and Order of Dismissal, ABC v Rose Harvey 2:16-cv-01582, Aug. 4, 2018.



March 18, 2024

Deb Jung, Chair
Howard County Council
3430 Court House Drive
Ellicott City, Maryland 21043

Re: Support CB13-2024 Trap-Neuter-Return

Dear Chair Jung and members of the Council,

The Humane Society of the United States (HSUS), the nation's largest animal protection organization, understands that managing community cats is a complex issue that concerns many local leaders and agencies mandated to serve and protect the public. Cat management should be designed to protect public safety, protect cats, and provide animal control agencies with effective, proactive, humane tools to manage cat populations. We support and promote strategic, non-lethal management of community cats who already exist outdoors through sterilization and vaccination efforts, such as trap-neuter-return (TNR). Our publication, [Managing Community Cats: A Guide for Municipal Leaders](#), outlines the efficacy and benefits of non-lethal management for unowned community cats.

The HSUS supports the proposed Trap-Neuter-Return Program amendments to Howard County's animal ordinance and the efforts of local stakeholders to implement TNR and other proven strategies for addressing free-roaming cats for the benefit of all residents of your community. The updates enable the county's animal control division to set guidelines for conducting TNR as well as supports the countless residents who provide food, water, shelter and veterinary care to the county's community cats. The new law will also clarify that caring for these cats is not a de facto nuisance, rather there must be a mitigating factor to declare the action such.

Community cat programs are now the standard for animal shelters across the country, combining community-based trap-neuter return with shelter policies allowing healthy stray cats to be sterilized and vaccinated then returned to their outdoor home and efforts to rehome young kittens. Many animal control agencies and animal shelters work with their community to ensure the sterilization and vaccination of community cats and provide support to the people who care for them, with more than half directly participating in sterilizing and returning cats. It's estimated that almost one third of shelters have staff positions dedicated to community cat programs. This is a testament to how effective these efforts are.

After a century of removing cats from the outdoors without having an impact on their numbers, shelter professionals have found trap-neuter-return based programs are far more effective in both saving lives within the shelter and decreasing the overall population of free-roaming cats in our communities. A number of studies have been published to support this:



- A community cat program at the University of Central Florida in the 1990s reduced cat population by 85% over the course of 10 years.¹
- A population of over 300 cats in Newburyport, MA was eliminated through a concerted TNR effort paired with rehoming of adoptable kittens.²
- A 67% decrease in cat population was found in a Chicago neighborhood targeted for TNR, over the course of 8 years.³
- A study of TNR in rural North Carolina compared the impact of TNR with control groups. There was a 36% mean decrease where TNR was employed (range 30-89%) versus a 47% mean *increase* of control groups – where the actual increases across the three sites were 31%, 127%, 283%.⁴

Sadly, kittens born to the cats currently living outdoors, if not sterilized, will continue to fill the shelter at taxpayer expense or they will perish – only 25% of kittens born outdoors survive past 6 months of age. These deaths are preventable with TNR.

A study of data from before and after community cat programs were implemented six shelters across the country found a 40% decline in kitten intake with a 32% decline in overall cat intake and a corresponding 87% decline in kittens euthanized and an 83% decline in overall feline euthanasia.⁵

Trap-neuter-return programs are supported by the [American Association of Feline Practitioners](#) and the [Association of Shelter Veterinarians](#) as well as a plethora of other veterinary organizations and individual veterinary professionals. The [American Bar Association](#) also supports TNR, encouraging county and municipal governments to adopt laws that allow residents to engage in TNR and the ongoing management of free-roaming cats.

The National Animal Care and Control Association, a professional organization for animal control and humane law enforcement officers, also favors TNR over trap and remove. In a statement on [Animal Control Intake of Free-Roaming Cats](#), it states: It is the position of NACA that indiscriminate pick up or admission of healthy, free-roaming cats, regardless of temperament, for any purpose other than TNR/SNR, **fails to serve**

¹ Levy, J. K., Gale, D. W., & Gale, L. A. (2003). 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*, 222(1), 42-46. doi:10.2460/javma.2003.222.42

² Spehar, D., & Wolf, P. (2017). An Examination of an Iconic Trap-Neuter-Return Program: The Newburyport, Massachusetts Case Study. *Animals*, 7(11), 81.

³ Spehar, D., & Wolf, P. (2018). A Case Study in Citizen Science: The Effectiveness of a Trap-Neuter-Return Program in a Chicago Neighborhood. *Animals*, 8(1), 14.

⁴ Stoskopf, M. K., & Nutter, F. B. (2004). Analyzing approaches to feral cat management—one size does not fit all. *J Am Vet Med Assoc*, 225(9), 1361-1364.

⁵ Spehar, D. D., & Wolf, P. J. (2019). Integrated Return-To-Field and Targeted Trap-Neuter-Vaccinate-Return Programs Result in Reductions of Feline Intake and Euthanasia at Six Municipal Animal Shelters [Original Research]. 6(77). <https://doi.org/10.3389/fvets.2019.00077>



**THE HUMANE SOCIETY
OF THE UNITED STATES**

commonly held goals of community animal management and protection programs and, as such, is a misuse of time and public funds and should be avoided.

A trap-and-remove management scheme is simply ineffective and expensive. Consider a scenario where an officer traps and removes a portion of the cats, possibly satisfying the initial complaints. The remaining cats will reproduce, and the population will return to the level it was prior to the officer's trapping. The officer will again respond to complaints by removing those cats who are easily trapped, while the remaining cats produce new kittens. The cycle continues and the problem is never solved. The costs associated with various community cat management strategies implemented over the course of ten years was analyzed in a peer-reviewed paper published last year. A summary of the finding is outlined in [Guidance to Better Manage Free-Roaming Cat Populations](#).

Working alongside humane organizations and compassionate citizens to sterilize and stabilize the community's cat population can achieve the shared goal of fewer unowned cats outdoors. Fewer outdoor cats mean fewer community complaints and a reduced risk of predation on wildlife. For reasons mentioned above, TNR programs are the most effective option for protecting native wildlife—not allowing for TNR does not mean cats are removed from outdoors, rather it means they simply aren't managed and are allowed to continue to reproduce. More cats means more of a threat to wildlife.

Moreover, allowing residents to openly manage cat colonies promotes the adoption of sanitary feeding practices, identification, and intervention of new cats to the colony – who may be lost or abandoned – so that they may be reunited or rehomed, and collaboration with authorities when a problem arises. By clearing pathways for cats to be sterilized, an overall reduction in the community's outdoor cat population can be realized more quickly.

Thank you for considering our comments to make your Howard County a healthier and safer place for people, cats, and wildlife. Should you have any questions or desire to discuss this matter in more detail, please don't hesitate to reach out to us. We welcome an opportunity to assist you in creating effective, humane policy for cats and your community.

Sincerely,

Danielle Bays
Senior Analyst, Cat Protection and Policy
dbays@humanesociety.org
202-839-2022

Jennifer Bevan-Dangel
State Director, Maryland
jbevandangel@humanesociety.org
410-303-7954



MARYLAND ORNITHOLOGICAL SOCIETY



March 18, 2024

To: Howard County Council

RE: CB-13

Dear Members of the Howard County Council:

The Maryland Ornithological Society (MOS) and its Howard County Chapter, the Howard County Bird Club (HCBC) wish to comment on CB-13-2024. MOS is an all-volunteer organization of two thousand members established in 1945 for the study, enjoyment, and protection of birds and their habitats. HCBC was established in 1972 and has 375 members.

We are very concerned about the continuing steep decline of our bird populations. The United States have lost 29% of our birds since 1970.¹ One cause of the decline is free-roaming cats, which kill 1-3 billion birds per year in the U.S.² It should be noted that all native songbirds are federally protected under the International Migratory Bird Treaty Act of 1918 (MBTA).³ Legislating the release of cat with full knowledge of their certain continued bird predation constitutes legally sanctioning countless violations of the intent of the long-standing MBTA.

We can all agree on two points. None of us want to see cats suffer, and we must do something to lower the number of feral cats. We do not think the CB-13, which would officially establish a Trap-Neuter-Return program in Howard County, will accomplish those goals.

The bill states "TNR is humane and effective." It is neither, certainly not to birds, that die in terror and agony, nor to the cats. TNR returns cats to outdoors, where they are subject to weather, disease, predators, cars, and food insecurity. Feral cats in the main do not die a natural death. In fact, for this reason, People for the Ethical Treatment of Animals, (PETA) strongly oppose TNR as inhumane, both to cats and their victims.⁴ Dr. Michael Fox, former Vice-President of the Humane Society of the United States, also condemns the practice, calling TNR "good in theory only" and "a total failure."⁵

Peer-reviewed studies have shown that TNR only rarely reduces the numbers of cats. The only studies where numbers have shrunk have been small colonies of less than 50, or in isolated locations that do not allow in-migration of new cats. And TNR does not reduce numbers in the short term, as the cats are put back into place. One can reasonably ask, when will numbers actually begin to decline, and how many TNR colonies actually disappear with time as they are supposed to do? One study which a prominent TNR advocacy organization cites as a "success,"

documents a program in the Florida Keys that took 22 years to reduce the number of cats by 55%. The same organization also cites two studies done in California and New Mexico as proof that TNR works, but uses reduction in shelter intake and euthanasia as a measure of success, without measure of colony size. That organization's "Trap-Neuter-Return Research Compendium" cites but two cases where a TNR colony disappeared. In one case, it took 16 years, in the other, 10 years. One would think if the program was so successful, they would cite numerous cases, rather than just two.

Cats in a TNR program will still catch and kill birds, so these programs do nothing to help our declining bird populations. The area around a TNR site is likely to become devoid of small passerine birds and other small prey, which, in turn, can no longer support native predators, process known as hyper-predation.⁶

TNR and free-roaming cats also present a serious threat to public and wildlife health. While the cats are supposed to be vaccinated against rabies and other diseases, they rarely get the periodic booster shots needed to maintain immunity or to receive continuity of care. Omission of veterinary care meets the CB13-2024 definition of cruelty. Maryland and surrounding states have one of the highest rates of rabies in cats, according to the Centers for Disease Control (CDC). Yet TNR programs are not required to treat cats as rabies vectors, which is required of wildlife rehabilitators, who deal with species such as racoons or foxes.

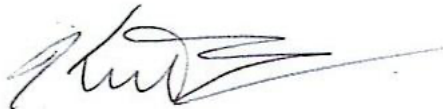
Cats spread the parasite *Toxoplasma gondii* in their feces, in fact, as the definitive host, they are the only source of the parasite in the environment. Toxoplasmosis is a leading cause of human death from food-borne illness, and has been linked to brain and behavioral changes in humans. Of concern is that over 60 million people are infected in the U.S. The CDC states that the best way to keep cats from getting infected by *Toxoplasma gondii* is to keep them indoors. Toxoplasmosis also infects wildlife, and has been found in white-tailed deer, and the cause of recent deaths of endangered sea otters in California.

We suggest the following steps to reduce the number of cats in a humane way, which in turn will benefit wildlife, public health, wildlife health, and the cats.

- Aggressively educate the public on the problem of cat overpopulation and the need for neutering and vaccination
- Encourage cat owners to neuter their cats if not engaged in breeding
- Encourage cat owners to keep their cats indoors or leashed or fenced when outdoors. A good resource for those wishing to expose their cats to the outdoors without hurting wildlife is the American Bird Conservancy's Cats Indoors! Program.
- Enact and enforce local municipal and county leash and licensing laws, with requirement of microchipping
- Fully fund municipal and county animal control agencies
- Provide low-cost or free neutering programs by local governments and humane organizations.

- Strongly promote adoption programs by animal control agencies and local governments as well as other appropriate solutions such as enclosed sanctuaries, where neither wildlife nor public health are threatened
- Require animal control agencies to use euthanasia only as a last resort, while ensuring that genuine pets are not accidentally put down.
- That MOS continues a dialogue on this issue with organizations and government agencies to devise the most appropriate, humane, and conservation-minded solutions to the issues.

To conclude, CB-13 is bad for birds, public health, wildlife health, and the cats. We urge the Council to table this bill for further study and demonstrable action on the recommendations offered above.



Kurt R. Schwarz
 Conservation Chair Emeritus
 Maryland Ornithological Society

¹ Rosenberg, Kenneth V. et al, Decline of the North American avifauna, Science, VOL 366, NO. 6451, 19 September 2019, https://www.science.org/doi/10.1126/science.aaw1313?adobe_mc=MCORGID%3D242B6472541199F70A4C98A6%2540AdobeOrg%7CTS%3D1707754028

² Loss, Scott R., et al, The impact of free-ranging domestic cats on wildlife of the United States, Nature Communications, 29 January 2013, https://repository.si.edu/bitstream/handle/10088/19537/nzp_Loss_et_al_2013_Nature_Communications_-_Impact_of_cat_predation_on_US_wildlife.pdf?sequence=2&isAllowed=y

³ Title 16 US Code 73-712 Migratory Bird Treaty Act of 1918, <https://www.govinfo.gov/content/pkg/USCODE-2020-title16/pdf/USCODE-2020-title16-chap7-subchapII-sec703.pdf>

⁴ PETA, The Great Outdoors? Not for Cats!, <https://www.peta.org/issues/animal-companion-issues/overpopulation/feral-cats/great-outdoors-cats/>

⁵ Fox, Dr. Michael W. Releasing Cats to Live Outdoors: Humane, Environmental, and One Health Concerns, <https://drfoxonehealth.com/post/releasing-cats-to-live-outdoors-humane-environmental-and-one-health-concerns/>

⁶ Longcore, Travis, Catherine Rich, and Lauren M. Sullivan, “Critical Assessment of Claims Regarding Management of Feral Cats by Trap-Neuter-Release,” Conservation Biology, Volume 23, No. 4, 2009, <http://www.urbanwildlands.org/Resources/2009LongcoreetalConBio.pdf>



MARYLAND VOTES FOR ANIMALS

PO Box 10411
BALTIMORE, MD 21209

March 18, 2024

To: County Council of Howard County, Maryland
Re: Bill No. 13 -2024 – Trap- Neuter- Return Program - Establishment

Dear Councilmembers,

My name is Lisa Radov. I am the President and Chair of Maryland Votes for Animals. We champion humane legislation to improve the lives of animals in Maryland. One of the signature pieces of legislation that we passed was the Maryland Spay and Neuter Fund which not only gives low income spay and neuter services to Marylanders, it also provides these services to local TNR programs.

We are committed to supporting local efforts to establish more TNR programs that can participate in the statewide program. We hope with the establishment of a TNR program in Howard County, that residents can help the community cats in Howard County with the grants available through the Maryland State Spay/ Neuter Fund.

Maryland Votes for Animals strongly supports Bill 13- 2024. I know that the Maryland Spay and Neuter Fund will be eager to see local shelters and rescues in Howard County apply for these grants to fund TNR programs.

Thank you for considering this bill that will help so many cats in Howard County.

With gratitude,
Lisa

Lisa G. Radov
President and Chair of the Board
Maryland Votes for Animals, Inc.
www.voteanimals.org
radovlisa@gmail.com
443-286-5457