

PROPOSAL 107

5 AAC 92.990. Definitions.

Add unconfined and unrestrained domestic cats to the definition of “deleterious exotic wildlife” as follows:

(52) “deleterious exotic wildlife” means any starling, English sparrow, or raccoon; any **domestic cat (Felis catus)**, Norway rat, rockdove or Belgian hare that is unconfined or unrestrained; and any feral ferret or feral swine;

What is the issue you would like the board to address and why? None of the invasive species that the Board of Game (board) has previously identified as “deleterious exotic wildlife” are as deleterious as the unconfined or unrestrained domestic cat. Cats now outnumber dogs in North America, with the number of pet cats tripling in the past 40 years. U.S. households own an estimated 94 million cats, while the best estimates of abandoned, stray and feral (aka free-ranging) cats range from 70-100 million. Cats are now the most abundant terrestrial carnivore in North America.

In the most comprehensive meta-analysis of cat predation conducted to date, free-ranging and pet cats were estimated to kill 1.3 to 4 billion wild birds and 6.3 to 22.3 billion mammals annually in the contiguous United States.¹ A similar analysis estimated that cats kill 100-300 million wild birds annually in Canada, which has a much lower population of cats.² Using the same predation rates as the national study, an estimated 30,000 free-ranging and 74,600 pet cats are estimated to kill 1,148,000 birds and 5,975,000 mammals annually in the Municipality of Anchorage alone.³

These estimates are driven primarily by the high number of cats. The average pet cat probably kills less than a bird a month, but it adds up. Most of these prey items are native species, not deleterious exotics like house mice, rats or house sparrows. Cats kill more wild birds annually than windows, communication towers, vehicles, and pesticides combined.¹

Cats are the sacred cows of America. Unlike dogs, in most jurisdictions pet cats don’t require licenses, leashes or constraints. The public (and most animal control agencies) seem to accept free-ranging cats, but not free-ranging dogs. For example, Alaska state law allows a person to shoot a dog that is harassing wildlife (under certain conditions), but not a cat.

Adding insult to injury, the board has classified some species of feral pets (including ferrets, European rabbits [erroneously listed as “Belgian hares”], pigeons, rats and mice) and other feral domestic animals (such as feral swine) as “deleterious exotic wildlife” or invasive species, but not feral cats.

Feral cats are considered to be one of the world’s 100 worst invasive species by the International Union for Conservation of Nature,⁴ one of the 50 top invasive species in western states by the Western Governor’s Association (of which Alaska is a member state),⁵ and a species with high invasive potential in Alaska by the University of Alaska’s Alaska Natural Heritage Program.⁶

Starlings, house (“English”) sparrows, rock (“doves”) pigeons, European rabbits (“Belgian hares”) and feral swine are included in the definition of deleterious exotic wildlife primarily because they compete with native species for food and other resources such as nest sites. They can also spread diseases to native species. Brown (“Norway”) rats, raccoons, and ferrets are included because they kill wildlife. But none of these species (with the possible exception of rats on Aleutian islands) compete with, kill, or spread diseases to Alaska’s wildlife to the extent that cats do.

Domestic species may not be released into the wild in Alaska (5 AAC 92.029). However, unlike most other domestic species, there seems to be little concern for free-ranging cats. Many owners don’t even try to confine them. Because they are far more regulated, dogs are seldom as problematic as cats.

A good example of the unquestioned, unique status of cats is the inclusion of ferrets as deleterious exotic wildlife in Alaska. Ferrets – because they are weasels domesticated as a hunting aid – are thought by some to pose a threat to wildlife if released into the wild. Two states, Hawaii and California, still prohibit owning ferrets as pets. Nevertheless, a summary of issues and options prepared for California noted that ferrets were less likely to be predators than prey, and would not survive more than about three days in the wild according to one source, although he stretched that estimate to a few weeks just to be safe.⁷ Despite their fierce reputation, ferrets do not seem to pose a significant problem to native wildlife. A survey of multiple state and county officials from a wide array of natural and agricultural agencies found less than one sighting of a feral ferret per year, with no discernable impact on wildlife noted.⁸ And yet cats, which kill billions of wild birds and mammals in North America (and millions in Alaska) annually, are not on the state’s list.

A similar comparison can be made with rats. An analysis of the cost of alien and invasive species in the U.S. conducted in 2005, when cat populations were approximately two-thirds as high as current estimates, calculated the annual value of wild birds killed by feral cats (i.e., not including those killed by pet cats) to be approximately \$17 billion, only slightly less than the economic cost of rats.⁹ The analysis didn’t subtract the value of small mammals, amphibians and reptiles killed by cats. Nor did it factor in the human health impacts of toxoplasmosis and other cat-related diseases. The same analysis concluded that the economic cost of feral and pet dogs was \$620 million annually, including treatment of dog bites and human fatalities. When a careful, objective assessment concludes that cats pose a greater environmental threat than rats, you know we have a serious problem. Why aren’t cats on the state’s list of deleterious exotic wildlife?

The Board of Game appears to have a low threshold for “feral.” Swine, ferrets and non-indigenous gallinaceous birds (e.g., turkeys, chickens, pheasants) are considered feral “if the animal is not under direct control of the owner, including being confined in a cage or other physical structure, or being restrained on a leash” (5 AAC 92.029[d][1]). However, somewhat surprisingly, the much more abundant and problematic free-ranging domestic cats are not included on the state’s list of feral animals.

I considered adding only “feral cats” to the definition. Individual feral cats tend to kill more wild birds and mammals than stray or pet cats. However, almost all unconfined and unrestrained cats kill wild birds and mammals. The problem isn’t limited to feral cats; the problem is the growing number of cats, irresponsible owners, and the propensity of cats to hunt and kill even when they

are well fed. It is also extremely difficult for an enforcement officer to differentiate between a feral, stray, abandoned or any other free-ranging cat because many pet cats don't wear collars or tags. Not including all unconfined and unrestrained cats on the state's list of deleterious exotic wildlife makes a mockery of that list.

In a previous Board of Game meeting, some members expressed a concern that adding cats to the list of deleterious exotic wildlife would result in promiscuous shooting of pet cats. However, having a law on the books that allows any person to shoot a dog that is harassing big game doesn't seem to have resulted in a lot of pet dogs being shot by neighbors. Most people won't shoot a feral cat, but the risk of penalties or losing one's pet cat should instill a sense of responsibility in cat owners, as it does in dog owners.

¹ Loss, S.R., T. Will, and P.P. Marra. 2013. The impact of free-ranging domestic cats on wildlife in the United States. *Nature Communications* 4. <http://www.nature.com/articles/ncomms2380>

² Blancher, P. 2013. Estimated number of birds killed by house cats (*Felis catus*) in Canada. *Avian Conservation and Ecology* 8:3. <http://www.ace-eco.org/vol8/iss2/art3/>

³ Sinnott, R. 2019. Animal control in Anchorage, Alaska: cats and dogs deserve equal treatment. Prepared for the Anchorage Animal Control Advisory Board and Anchorage Watershed and Natural Resources Advisory Commission, Anchorage, Alaska. 110 pp. <https://www.muni.org/Departments/OCPD/Planning/SiteAssets/Pages/WNRCReso-MinutesArchive/WNRC%20ltr%20to%20Animal%20Control%20Board%20w%20Report-12-20-2019%20rev.pdf>

⁴ Lowe, S., M. Browne, S. Boudjelas, and M. De Poorter. 2000. 100 of the world's worst invasive alien species. Invasive Species Specialist Group, International Union for Conservation of Nature (IUCN). http://www.issg.org/pdf/publications/worst_100/english_100_worst.pdf

⁵ Western Governors' Association. 2018. Top 50 invasive species in the West. http://westgov.org/images/editor/WGA_Top_50_Invasive_Species.pdf

⁶ McClory, J., and T. Gotthardt. 2008. Non-native and invasive animals of Alaska: a comprehensive list and select species status reports. Final report. Alaska Natural Heritage Program, University of Alaska Anchorage, Anchorage, Alaska. 64 pp. http://www.adfg.alaska.gov/static/species/nonnative/invasive/pdfs/invasivespp_report.pdf

⁷ Umbach, K.W. 1997. Ferrets: a selective overview of issues and options. CRB Note 4(3):9 pp. California Research Bureau, California State Library. <http://www.legalizeferrets.org/wp-content/uploads/2016/03/CA-Research-Library-Article.pdf>

⁸ Lepe, A., V. Kaplan, A. Arreaza, R. Szpanderfer, D. Bristol, and M.S. Sinclair. 2017. Environmental impact and relative invasiveness of free-roaming domestic carnivores – A North American survey of governmental agencies. *Animals* 7(10), 78. <http://www.mdpi.com/2076-2615/7/10/78/htm>

⁹ Pimentel, D., R. Zuniga, and D. Morrison. 2005. Update on the environmental and economic costs associated with alien-invasive species in the United States. *Ecological Economics* 52:273-288. https://www.forest-trends.org/wp-content/uploads/imported/pimentel-et-al_2005-update-on-envir-econ-costs-of-invasives-pdf.pdf

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