

PROPOSAL 63 – 5 AAC 92.029. Permit for possessing live game. Prohibit the release of feral or stray domesticated cats into the wild as follows:

Put simply, to specifically and by name outlaw “Trap, Neuter, Release” (TNR) and all other "no-kill" programs predicated on trapping and treating feral domesticated cats and then returning them to the wild, or feeding and maintaining colonies of such cats unconfined, anywhere in the state of Alaska. An example of my proposed textual additions are given below in ***bold, italicized, underlined*** font:

Example: **AAC 92.029 Permit for Possessing Live Game** (d): Under this section, and in accordance with the definition of "game" as in AS. 69.05.940 (which includes feral domestic animals), a game animal defined as deleterious exotic wildlife or nonindigenous gallinaceous bird is 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; ***feral animals shall not be maintained unconfined in Alaska under the aegis of "no-kill" management programs such as TNR, TVNR, RTF or any other such program not providing for secure and continuous confinement of such animals at all times. Owners of such animals shall apply for permits issued by the department for all animals in their care, and shall abide by all conditions required by said permits.***

In support of the above I include text from **AAC 92.029 Permit for Possessing Live Game** (h): "Upon application" (for temporary release for hunting, field trials, etc.) the board will add a species to the list in (b) of this section if there is clear and convincing evidence that the species is (1) ***not capable of surviving in the wild in Alaska***; (2) is not capable of causing a genetic alteration of as species that is indigenous to Alaska; (3) ***is not capable of causing a significant reduction in the population of a species that is indigenous to Alaska***; (4) ***is not capable of transmitting a disease to a species that is indigenous to Alaska***; (5) ***does not otherwise present a threat to the health or population of a species that is indigenous to Alaska***; (6) is not captured from the wild for use as a pet; (7) does not present a conservation concern to the species' native habitat outside of this state; (8) can reasonably be maintained in good health in private ownership; and (9) ***does not present a likelihood that concerns about, or threats to human health and safety will lead to adverse consequences for captive animals.***

The ***underlined, italicized*** font in items (1), (3)-(5) and (9) clearly disqualifies feral cats from being considered as a species suitable for even temporary release into the wild.

The alternative solution I propose would be to reclassify feral cats as "vermin" and allow unlimited take, year-round.

What is the issue you would like the board to address and why? Respectful greetings to members of the Alaska Board of Game: My proposal is to add language to 5 AAC Ch. 92.029 specifically prohibiting release of feral or stray domesticated cats (*Felis catus*) into the outdoors, or maintaining them unconfined anywhere in the state of Alaska, as part of any so-called "no-kill" management scheme touted to be a "viable alternative" to euthanasia or other lethal means of animal control currently provided for by existing State regulation.

Such schemes are identified under various acronyms such as: TNR--"Trap, Neuter, Release"; TVNR--"Trap, Vaccinate, Neuter, Release"; RTF--"Return-to-Field", etc. Proponents' claims to the contrary notwithstanding, these programs have proved utterly worthless for control or reduction of feral cat populations, and they pose a growing public health threat to our citizens, zoonotic disease threat to our valuable native wild mammals (terrestrial and marine, game and non-game), and an egregious threat by direct depredation to Alaska's smaller native mammal and bird populations.

I submit this proposal because misguided "animal welfare activists" in Alaska have proposed to this board that exemptions be made to the existing language of 5 AAC 92.029 prohibiting release of domesticated animals into the wild, and which prohibits maintaining feral domesticated animals as defined per AS.16.05.940 "...if the animal is not under direct control of an owner, including being confined in a cage or other physical structure, or being restrained on a leash."

Such "humane" activists desire exemptions to 5 AAC 92.029 so they can feed and maintain unconfined feral cat colonies in our environment. These groups already maintain such colonies in Anchorage and in the Mat-Su Valley illegally—they have admitted this on their websites and I've obtained screenshots of said admissions, which I will print and provide upon request during the period for public input or as the board directs.

Last May, an Anchorage Animal Control Officer verbally acknowledged to me that at least two illegal feral cat colonies in Anchorage were "managed" or otherwise cared for by one of these groups. The group's president volunteers at the Anchorage animal shelter. One of her online statements suggest the illegal cat colonies may have been moved to locations which are being kept secret.

The irresponsible practice of trapping, neutering, vaccinating and then returning feral cats where they were trapped represents egregious threats to public health and wildlife conservation, and does nothing whatsoever to reduce feral cat presence in our environment—quite the opposite. The following examples constitute some of the reasons for my proposal and opposition to a proposal which was unsuccessfully, attempted to be submitted to the board last year. Please be advised that I can provide peer-reviewed scientific reports substantiating every example listed below, and again, will provide said documentation on board request:

(1) Since the advent of "no-kill" feral cat programs, cats have become the primary domesticated rabies vector in the US. Nearly one-third of human rabies exposures—about 13,000 annually—are cat-vectored. This has been the case for nearly three decades.

(2) One reason for this is that TNR colony "care-takers" only give the initial rabies shot when they trap a cat. The required annual rabies booster is never given, because once trapped the cats become wary and difficult to re-trap (so the caretakers simply don't bother).

(3) The worst incidence of human rabies exposure in US history was due to a TNR feral cat colony in one New Hampshire town in 1994. A rabid raccoon attracted to food left out for the cats transmitted the virus to four feral kittens. The colony "caretakers" subsequently gave (or sold) these kittens to a local pet store, which distributed them to the public. 665 individuals had

to receive post-exposure prophylactic inoculations for rabies. It cost that municipality nearly \$2 million to treat them. Rabies is nearly always fatal.

(4) Cats are also the definitive host of a highly dangerous pathogen—*Toxoplasma gondii*—which reproduces exclusively in feline digestive tracts. In the US between 40% and 70% of free-roaming cats are infected with it, usually throughout their lives. The pathogen's oocysts are its infectious agents, and infected cats shed hundreds of millions of them with their feces. The oocysts persist and remain infectious for up to 4.5 years, and—again thanks to "no-kill" programs like TNR and the resulting proliferation of feral cats—they now occur in our environment at densities of from three to 434 per square foot.

(5) Although it's almost certain *T. gondii* oocyst density in Alaska is less than in the lower '48—if for no other reason than because of our colder climate and smaller feral cat population—a pregnant woman in Anchorage consumed toxoplasmosis-infected flesh from a moose which her husband shot in October 2013, and passed the oocysts she ingested with her meal to her unborn child, who nearly died. The child recovered thanks to heroic measures, but may still lose his eyesight to ocular lesions caused by toxoplasmosis. He will in any event be infected for life.

(6) Per the CDC toxoplasmosis is the leading cause of pathogenic blindness—mostly but by no means exclusively in children—and the second-leading cause of fatal food-borne illness, surpassed only by Salmonella. 4,500 Americans are hospitalized with toxoplasmosis-related food-borne illness each year. Nearly 10% of them die.

(7) The incidence is far greater in areas where there are large populations of free-roaming cats: 50% of Ohio's white-tailed deer population is now infected with toxoplasmosis. It's now unsafe to eat venison from these animals unless it's cooked to a core temperature of at least 157 degrees F, or frozen to at least -21 degrees F for at least two weeks to destroy the infectious oocysts.

(8) In British Columbia some Inuit mothers have been afflicted with chronic miscarriages and birth defects after consuming toxoplasmosis-infected beluga meat. The prevalence of infection in belugas is such that Canadian health agencies now attempt to screen beluga for toxoplasmosis before allowing its consumption.

(9) Toxoplasmosis causes up to 5,000 stillbirths, blind, hydrocephalic, microcephalic, severely deformed and mentally debilitated infants in the US each year.

(10) *T. gondii* oocysts survive in seawater, which they enter with runoff into the nearshore marine environment, where they are taken up into the tissues of oysters, mussels, anchovies and sardines. Cetaceans, pinnipeds and otters from Arctic Canada to New Zealand and from the US Pacific Coast to the United Kingdom consume these contaminated organisms and die from it—by the thousands. Apparently all species of terrestrial mammals—and several bird species—are just as susceptible to toxoplasmosis as marine mammals.

(11) *T. gondii* oocysts contaminate above-ground rural and/or urban drinking water supplies if they're inadequately filtered--chlorination does not kill them. This has caused toxoplasmosis outbreaks in several regions.

(12) The oocysts can and do aerosolize. Inhalation or ingestion of one oocyst is sufficient to blind, permanently debilitate or kill a child, elderly or immuno-compromised person. Possibly one-fifth of the US population is infected with toxoplasmosis. A healthy immune system suppresses its symptoms. However, everyone's immune system will degrade with age, and the oocysts will still be present—toxoplasmosis infection is for life—there is no cure.

(13) I have mentioned only two of the more than three dozen deleterious and/or potentially fatal zoonotic diseases which cats carry—some others are bartonellosis, tularemia, leishmaniasis, MRSA, toxocariasis and plague. These diseases are more prevalent and infectious in regions with large stray and feral cat populations. My purpose in submitting this proposal in opposition to legalizing TNR or other worthless "no-kill" programs in my state is to prevent Alaska from becoming like those regions.

(14) Describing TNR as "worthless" is by no means an overly harsh assessment. Since the advent of this program in the US, two- and three-decades old feral colonies have become commonplace, for example in Washington DC and Disneyland (Anaheim). Even more telling, TNR was first practiced in the UK. Despite a half-century of TNR, the British stray and feral cat population has more than doubled—from 4.1 million in 1965 to 9.1 million today.

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