



THE WILDLIFE SOCIETY

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23 July 2008

Jane Hendron
U.S. Fish and Wildlife Service
6010 Hidden Valley Road
Carlsbad, CA 92011

Dear Ms. Hendron:

On behalf of The Wildlife Society, I am writing to support the U.S. Fish and Wildlife Service in its plan to remove feral cats from San Nicolas Island in the Channel Islands of California. While I understand that the official public comment period for the Environmental Assessment for San Nicolas Island Seabird Restoration Project (EA) has passed, we hope the Fish and Wildlife Service (FWS) will nonetheless consider this letter of support.

The Wildlife Society (TWS) is an international, membership organization dedicated to excellence in wildlife stewardship through science and education. Since 1937, TWS has worked to advance the science and practice of wildlife management and conservation, promote continuing education of wildlife professionals, and advocate for science-based wildlife policy. These activities further the Society's mission to represent and serve wildlife professionals – the scientists, technicians, and practitioners actively working to manage, conserve, protect, and study wildlife and their habitats worldwide. The Wildlife Society currently has nearly 8,000 members in the U.S., Canada, and worldwide.

The Wildlife Society promotes the maintenance of biological diversity and ecosystem integrity and opposes the modification and degradation of natural biomes by invasive species. These nonnative species have the potential to adversely affect native and endangered wildlife and plant species and are one of the most widespread and serious threats to the integrity of native wildlife populations and natural ecosystems. Exotic species present special challenges for wildlife managers because their negative impacts are poorly understood by the general public, many exotic species have become such an accepted component of the environment that many people regard them as "natural," some exotic species have advocacy groups that promote their continued presence, and few policies and laws deal directly with their control.

Feral and free-ranging domestic cats are exotic species to North America. A growing body of literature strongly suggests these cats are a significant factor in the mortality of small mammals, birds, reptiles, and amphibians. Because free-ranging cats often receive food from humans, they can reach population levels that may create areas of abnormally high predation rates on wildlife. When the wildlife prey is a threatened or endangered species, the result may be extirpation or extinction. Effects of cat predation are most pronounced in island settings (both actual islands

and islands of habitat), where prey populations are already low or stressed by other factors, or in natural areas where cat colonies are established.

The Wildlife Society strongly supports and encourages the humane elimination of feral cat colonies and opposes the establishment of managed feral cat colonies, the public feeding of feral cats, especially on public lands, and release of unwanted pet or feral cats into the wild. We commend the Fish and Wildlife Service for developing a plan to remove non-native feral cats from San Nicolas Island, thereby allowing the native plant and animal species to flourish.

TWS supports the FWS' preferred alternative that calls for integrated adaptive management, using a mix of live trapping (followed by euthanasia) and shooting (with or without specially trained dogs). The EA clearly indicated why other management options would not be effective in this situation. Trap-neuter-release is not permitted on Navy property and, in any event, would not effectively remove the cats from the Island in a reasonable time frame. Trapping and relocation to managed colonies elsewhere would simply transfer the management problem created by the cats to another habitat and is therefore unpalatable. While trapping and adopting out the cats may sound like a reasonable alternative, these cats are not tame, and therefore will never make good candidates for adoption. FWS was correct in its analysis that removal of the cats through trapping and shooting is the best alternative, consistent with wildlife management and conservation practices and principles, as well as animal welfare.

Again, The Wildlife Society commends FWS in its approach to removing feral cats from San Nicolas Island so that the native populations of seabirds, reptiles, and small mammals can thrive.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Hutchins", written in a cursive style.

Michael Hutchins, Ph.D.
Executive Director/CEO, The Wildlife Society