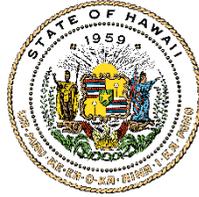


JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
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DEPUTY DIRECTOR - WATER
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MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES
ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND

July 25, 2023

TO: Board of Agriculture, Hawaii Department of Agriculture
FROM: Department of Land and Natural Resources, Division of Forestry and Wildlife
SUBJECT: Testimony on Plant Quarantine Branch Agenda Item #1

The Department of Land and Natural Resources, Division of Forestry and Wildlife (Division) **opposes the request from Tiffany Leilani Nerveza-Clark to initiate administrative rule-making and rule amendment to Ch. 4-71 to change the list placement of the hybrid Savannah cat, crossed of the Serval, with the domestic cat from the list of prohibited animals to enable individual possession.**

The Savannah cat is a hybrid of a domestic cat and an African serval, making the cat much larger than a normal domestic cat and retaining many of the serval's features including enhanced hunting capabilities. The hybridization with the serval cat poses major risks to native fauna. In Australia, attempts to import Serval cat hybrids have been denied because of the risk they would pose to Australia's native mammal and bird populations. An Australian study from 2019 predicted with modeling that an estimated "91% of Australia's extant terrestrial mammal fauna would likely face some risk of predation from savannah cats, including 93% of non-volant mammal species that have threatened conservation status" ([Dickman et al 2019](#)).

In Hawaii, many of our migratory and forest bird populations that still remain are already under threat from invasive species such as mosquitoes and free-roaming "domestic" cats. Free-roaming cats have been caught on game cameras predating on migratory seabirds (Image 1) and pose a major challenge for ongoing conservation efforts. They also spread toxoplasmosis to Hawaiian monk seals and birds. We have seen countless cats be abandoned into Hawaii's natural areas, parks, and public spaces where they pose an environmental and human health risk. The allowance of a new predator to Hawaii that has the potential to harm the unique fauna that is already at risk would be irresponsible and set a precedent that other harmful species could be removed from the prohibited list allowing their importation into the State for individual possession.

Mahalo for the opportunity to provide testimony in opposition.



Image 1 (DLNR) Image from game camera in 2016 where researchers discovered the bodies of six endangered Hawaiian Petrels at a remote breeding colony in Hono o Na Pali Natural Area Reserve, Kauai. All had been dragged from their breeding burrows by feral cats and partially eaten, including one incident that was caught on a monitoring camera.



Board of Agriculture
July 25, 2023
Department of Agriculture
9 a.m. Plant Quarantine Branch
1849 Auiki Street
Honolulu, Hawaii 96819

**Testimony to Oppose Amendment to Hawaii Administrative Rules, Ch 4-71
To Authorize Importation or Individual Possession of Serval Hybrids**

Aloha Chairperson and Members of the Board of Agriculture,

The Coordinating Group on Alien Pest Species (CGAPS) **opposes amendment to chapter 71, Hawaii Administrative Rules, that would allow the importation or possession of the Savannah cat, crosses of the Serval, *Felis (Leptailurus) serval* with the domestic cat, *Felis catus*.**

The chapter 71 HAR Prohibited List includes any cross between a domestic cat and a species on the chapter 71 HAR Prohibited List or Restricted List. The serval is on the chapter 71 HAR Restricted List Part A (authorized for research and exhibition only; not for individual, private, or commercial use). The Prohibited List also includes all hybrid crosses where one or both parents are prohibited. Since a hybrid of a domestic cat x serval is prohibited, any cross of that hybrid with a domestic cat or another Savannah cat would also be prohibited.

We hope the Board will maintain the Savannah cat as a prohibited species. The potential impacts of Savannah cats in Hawaii are unknown. While some Savannah cat owners will be very conscientious and ensure that their Savannah cat is never allowed outside or to mix with stray or feral cat populations, other owners may not. A pet Savannah cat could also inadvertently sneak out from even the most conscientious owner.

The exact percentage of serval genes in each Savannah cat is unknown. Even if the Savannah cat is spayed or neutered, the larger size of Savannah cats compared to domestic cats and the potential for retention of serval traits could allow a Savannah cat to predate on native species more effectively or on a wider range of species than Hawaii's current feral or stray cat populations. The potential threat to native birds, including threatened and endangered species, and other species is unknown in Hawaii.

In 2008, the Australian Government published a Final Environmental Assessment of the Suitability of the Import of the Savannah Cat (Domestic Cat x Serval Hybrid Specimens) into

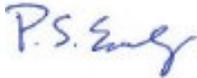
Australia.¹ That Assessment concluded, “the importation of Savannah Cats at any generation could exacerbate and increase the threat to the Australian environment.”² We hope the Department of Agriculture will thoroughly consider the risks described in that Assessment with respect to allowing importation of Savannah cats into Hawaii before making any amendment to the Savannah cat’s status in chapter 71, HAR.

Thank you for the opportunity to provide testimony on this issue.

Aloha,



Christy Martin
CGAPS Program Manager



Stephanie Easley
CGAPS Legal Fellow

¹<http://www.environment.gov.au/archive/biodiversity/trade-use/publications/pubs/savannah-cat-assessment-report.pdf> (Australian Final Environmental Assessment)

² Australian Final Environmental Assessment, p. 33.

Clingan, Marci

From: helen raine <helenraine1@gmail.com>
Sent: Thursday, July 20, 2023 5:30 PM
To: HDOA.BOARD.TESTIMONY
Subject: [EXTERNAL] testimony - hybrid cat ban

Dear Board,

As a conservation professional working in Hawai'i, I urge you in the strongest terms not to change, weaken or amend the current ban on the importation of hybrid cats to our island state. I see first hand on a regular basis the devastation that existing domestic cats cause to threatened and endangered wildlife in Hawai'i- allowing the importation of a potentially more deadly predator into the islands will continue to put pressure on native birds that are already close to extinction, with species such as the 'alae 'ula and koloa maoli numbering less than 1000 birds each globally. We have a responsibility to protect these native Hawaiian birds from predators - introducing new predators in the form of hybrid cats moves us further away from that goal. Moreover, I do not believe that the vast majority of local people would support the wishes of a small minority of people to bring these non native species into Hawai'i, given the appalling consequences of previous introductions on our unique wildlife.

I appreciate your consideration of this request and am happy to discuss this further.

Thanks and regards

Helen Raine
Biologist.

Clingan, Marci

From: Jessica Miller <jmiller@marstel-day.com>
Sent: Thursday, July 20, 2023 3:39 PM
To: HDOA.BOARD.TESTIMONY
Subject: [EXTERNAL] Testimony for Hybrid Cats in Hawaii

Hi,

I would like to provide a testimony against the petition to change the list placement of the hybrid Savannah cat from the list of prohibited animals to enable individual possession. Feral cats are already a significant issue in Hawai'i as they predate on threatened and endangered species that are critical to the ecosystem. The possibility for hybrid cats to escape or be released from their enclosed quarters poses unnecessary risk to current and future wildlife. I believe it is more appropriate to dedicate our time and resources to effectively addressing the current feral cat issue before introducing new and more dangerous cats to Hawai'i.

Thank you for your time and consideration.

Best,
Jessica Miller
Climate Resilience and Natural Resource Partnerships Planner
<http://www.marstel-day.com>
(540) 498-8365

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Maui Nui Seabird
Recovery Project

P.O. Box 903, Makawao, HI 96768
808.572-3500 – mauinuiseabirds@gmail.com
www.mauinuiseabirds.org

July 20, 2023

To: Hawai'i Board of Agriculture

From: Jay F. Penniman
Manager, Maui Nui Seabird Recovery Project

Subject: Subject: (1) Request for Review of the Petition from Tiffany Leilani Nerveza-Clark to Initiate Administrative Rule Making and Rule Amendment to Chapter 4-71, Hawaii Administrative Rules (HAR), to Change the List Placement of the hybrid Savannah cat, crosses of the Serval, *Felis (Leptailurus) serval* with the domestic cat, *Felis catus*, From the List of Prohibited Animals to enable individual possession.

Please note my absolute opposition to approval of the above referenced Request for Review to change List Placement for these or any other *Felis species*.

I manage the Maui Nui Seabird Recovery Project, a project of the Pacific Cooperative Studies Unit (PCSU) of the University of Hawai'i at Manoa, in close cooperation with the Hawai'i Division of Forestry & Wildlife. Our mission is to restore and protect Hawaiian native seabird populations.

Feral cats are one of the most invasive alien mammals that impact our native wildlife. They have no place on the landscape of the Hawaiian Islands. Before human occupation of the archipelago there were two mammals present; ilio-holo-i-ka-uaua (*Monachus schauinslandi*, Hawaiian monk seal) and 'Ōpe'ape'a (*Lasiurus cinereus*, Hawaiian hoary bat). Neither of these species predates Hawaiian avian species; seabirds, forest birds, or water birds. Therefore all of our native avifauna has evolved with no mammalian predator adaptation. Our birds are uniquely vulnerable to alien mammal predation. All *Felis species* are obligate carnivores; they are genetically programmed to hunt and present an insurmountable threat to our native wildlife. In addition, for the parasitic protozoan, *Toxoplasma gondii*, Felids are the only known definitive host in which the parasite may undergo sexual reproduction. The disease caused by this organism, Toxoplasmosis, may be passed to any mammal and has also infected nene (*Branta sandvicensis*, Hawaiian goose) and alala (*Corvus hawaiiensis*, Hawaiian crow).

Conservation biologists in Hawai'i are working to develop means to remove existing feral cats and maintained cats on the landscape. These mammals have no place free ranging on our islands. Adding the potential to increase the diversity of *Felids* in Hawai'i must be rejected. It seems that regulations requiring cats to be kept indoors or on leashes are routinely opposed by the cat care community. People regularly abandon pet cats, believing that the cats will be able to survive on their own and ignoring the fact that cats predate native wildlife and when freely roaming, have exposure to disease, and accidents when not kept as controlled pets.

Please reject this request and join in efforts to further regulate cats that are already held as pets. All cats should be treated as pets in the same way as dogs are. Cats should be licensed to individuals, be kept indoors and on leashes when outdoors. These requirements are best for the health and well being of the cats themselves as well as for protection of our native wildlife.

Mahalo nui for your attention,

A handwritten signature in blue ink on a light-colored background. The signature is stylized and appears to read "Jay F. Penniman".

Jay F. Penniman

jayfp@hawaii.edu

808-280-4114