



ANIMAL
ALLIANCE
OF CANADA



Animal Alliance
Environment Voters
Party of Canada



September 18, 2013

Chairperson and Members,
Municipal Licensing and Standards Committee,
City of Toronto

Dear Chairperson and Members of the Municipal Licensing and
Standards Committee,

**P:\2013\Cluster B\MLS\LS13014
Coyote Response Strategy**

Thank you for the opportunity to comment on the draft Coyote
Response Strategy.

We are generally very pleased and want to thank City staff for
bringing it forward for comment. The prevention and non-lethal
intervention strategies, including the educational component as
outlined in Attachment 1, are excellent.

We are particularly encouraged by the collaborative nature of the
strategy, including consultation with such organizations as the
Toronto Wildlife Centre, Coyote Watch Canada and the Toronto and
Region Conservation Authority, and by the implementation of best
practices drawn from communities like Oakville and Niagara Falls.

We have several amendments and one new recommendation that we
believe will strengthen the strategy. They are as follows:

Amendments:

1. **Background:** Replace value laden terminology like
"habituated" with the following wording: *"food reward
increases proximity tolerance to people and places where
humans frequent"*. This wording is a neutral description used
by Coyote Watch Canada in its Niagara Falls programme, a
programme which teaches peaceful co-existence with coyotes;
2. **Education:** Provide links to organizations like Coyote Watch
Canada and others who provide humane non-lethal resolutions
where humans come into conflict with coyotes;
3. **No-feeding Provision:** Provide clarity to the no-feeding
provision. Although Municipal Licensing and Standards can
investigate and bring charges, the no-feeding provisions which
were in place during previous human/coyote interactions
caused by feeding, were ineffective.

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4. **Removal – Subsection (a):** This section should be amended to read, “TAS will undertake an investigation *with the assistance of wildlife rehabilitation experts such as the Toronto Wildlife Centre* to determine whether the coyote...”
5. **Removal – Subsection (b):** This section should be amended to read, “*TAS will investigate to determine the cause of the bite, such as feeding and make all attempts to remove attractants and modify the behaviours of both humans and coyotes involved in the conflict.*” Conditions for removal will not normally...”
6. **Removal – Subsection (c):** This section should be amended to clearly define what is meant by “*a bona fide threat to public safety*” and that prior to killing the animal or animals, “*TAS investigate to determine to cause of the threat (e.g. biting), such as feeding or protecting a den, and make all attempts to remove attractants, protect the denning site from human interference and modify the behaviours of both humans and coyotes involved in the conflict.*”

New Recommendation:

7. **Create a Strategic Wildlife Unit in the Metropolitan Toronto Police:** A section should be added to recommend that Toronto Animal Services work with the Metropolitan Toronto Police to establish a Strategic Wildlife Unit within the police force, staffed by officers trained in wildlife behavior and humane, non-lethal conflict resolutions and to assist other officers who are called to resolve such conflicts.

Conclusion: Thank you for your work. We urge you to adopt our recommendations and pass the Coyote Response Strategy.

Sincerely,



Barry Kent MacKay
Canadian Representative
Born Free USA



Liz White,
Director/Leader
Animal Alliance/Environment Voters