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,

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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.
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