

2023.IE6.8 - Citywide Approach to Dogs Off-Leash Areas, Infrastructure and Environment Committee on September 20, 2023_Lenka Holubec_REVISED for City Council meeting on Oct 11, 2023

Oct 11, 2023

VIA Email: councilmeeting@toronto.ca

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RE: 2023.IE6.8 - Citywide Approach to Dogs Off-Leash Areas, Infrastructure and Environment Committee on September 20, 2023

Dear Mayor Olivia Chow and Council Members,

Thank you for this opportunity to comment on Citywide Approach to Dogs Off-Leash Areas.

As a member of [ProtectNatureTO](#), I have commented over the years on a number of issues from a perspective of long-term conservation of natural heritage and protection policies adopted by the City Council and where biodiversity/climate crises lens is critical for sustainability including protecting ecosystems from effects associated with human impacts such as our recreational activities.

Task, presented by 2023.IE6.8 - Citywide Approach to Dogs Off-Leash Areas to review and update the City's approach to planning, locating, funding, building and maintaining Dogs Off-Leash Areas - based on recognized best practices and integrated with the Parks, Forestry and Recreation Facilities Master Plan - **is enormous, to say the least, and would require a process on the level comparable to [Toronto Ravines Strategy](#) to evaluate all important issues/elements based on existing city adopted policies, relevant science research and consulting.**

Recommendations:

1.

[The City wide Study of OLAs](#) initiated by the city was focusing along this path and its findings and conclusions should be utilized prior to embarking on further projects as indicated above.

Many dog owner-based organizations participated in The City wide Study of OLAs, including the Toronto Dog Park Community but also some nature groups such as ProtectNatureTO. It is worth mentioning that already during this Study, the ideas forming now basis of IE6.8 - Citywide Approach to Dogs Off-Leash Areas were discussed as this motion is almost word by word taken Toronto Dog Park Community petition [Toronto Needs an Off-Leash Area Master Plan](#).

2.

Citywide Approach to Dogs Off-Leash Areas would need be pursued in consistency with Toronto's objectives towards biodiversity and climate goals and guiding policies adopted by the city

[Our Plan Toronto: Draft Environment and Climate Change Official Plan Policy Updates](#) just recently proclaimed:

"The City of Toronto has a strong legacy of introducing leading-edge policies to protect the natural environment and address climate change...This Official Plan update emphasizes achieving net zero emissions and climate adaptation and reliance. Protection and enhancement of the City's natural heritage system and water resource systems is a key element of climate adaptation and resilience."

Toronto is fast growing city and is grappling with burgeoning dog numbers as all other big cities in the North America and globally.

Toronto's natural areas and wildlife habitats are under significant stressors related to rapid intensification and increasing number of pets, while the size of the parkland is finite and biodiversity declining.

The ESAs in Toronto are currently only 4% of the city land. Big Cities have important role to play in climate/biodiversity crisis to support local and regional biodiversity and ecological systems from decline.

There is no silver bullet to find solutions for this situation which is in a way related to climate/biodiversity crises.

Globally, the numbers of pets are growing. Recent report [State of the World's Birds](#) comes with [Invasive Alien Species List](#) placing dogs at the top of chart together with cats as the leading cause of bird populations declines.

Calgary has over 150 dog off leash areas, however the problems related to non compliance with the leash laws and impacts on wildlife continue to plague the local nature parks and wildlife.

Toronto is also seen as dogs very friendly city: *"Toronto is truly a world-class city in many regards, but did you know that it's actually been recognized globally for its pet-friendliness? ["2022 study by Luko](#) revealed that Toronto was among the top ten most dog-friendly cities in the world."*

Advocating for more off leash opportunities, DOLAs, natural trails, etc. is logically pursued by dog owners organizations but the fact is that dogs have very significant impact on wildlife and natural areas necessitating this process to be guided by the city adopted policies designed to protect/enhance city's remaining natural assets for the long term and future generations.

The City Official Plan adopted a high level of protection regarding designated natural heritage and natural or environmentally sensitive areas:

[-Toronto Official Plan Office Consolidation February 2019 Chapter 3,4 Natural Environment](#)

"Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas" the ESA/ANSIs

[-Toronto Municipal Code Chapter 608 Parks dogs prohibited areas](#)

A. Natural or environmentally sensitive areas (including designated ravines, wooded or savannah areas, sites of natural or scientific interest, areas which have undergone significant habitat restoration, wetlands or their buffer zones)

Our native wildlife especially is paying a high price for non-compliance with the leash laws (stress, injuries, fatalities, transmission of pathogens) and in the absence of the efficient enforcement. Public education on [Dogs in Natural Areas](#) is very important but cannot substitute for enforcement and implementation of relevant existing protection laws adopted by the city. Protecting remaining natural heritage system to retain it's the ecological function/integrity and enhance biodiversity is crucial for our city's continued sustainability.

City of Toronto made an obligation towards net zero carbon emissions and biodiversity. Growing population and number of pets pose a significant challenge in achieving these goals. How we manage "dogs in the city" and our expectations and demands on natural areas will be critical for biodiversity, while also affecting carbon footprint.

Sincerely,

Lenka Holubec, member [ProtectNatureTO](#) and [HighParkNature](#)

As a member of ProtectNatureTO, I have participated in numerous city efforts including: City Wide OLAs Study; Toronto Island Master Plan; Our Plan Toronto: Official Plan Review; High Park Movement Strategy and The City of Toronto project to develop a Management Plan Framework for Toronto's Environmentally Significant Areas (ESAs).

I offer my participation in any future city's efforts related to 2023.IE6.8 - Citywide Approach to Dogs Off-Leash Areas.

Background:

1.

Impacts of dogs on wildlife and water quality

April 2016, DOI:10.13140/RG.2.1.1107.5445, Metro Regional Government, Portland, Oregon

Lori Hennings, Metropolitan Regional Government - a senior natural resource scientist for Metro https://www.researchgate.net/publication/301800852_Impacts_of_dogs_on_wildlife_and_water_quality

Impacts on wildlife and water include:

1. Physical and temporal displacement
2. Disturbance and stress response
3. Indirect and direct mortality – Dogs transmit diseases (such as canine distemper and rabies) to and from wildlife.
4. Human disease and water quality impacts - Dog waste pollutes water and transmits harmful parasites and diseases to people.

FACTSHEET: IMPACTS OF DOGS ON WILDLIFE ProtectNatureTO / 2019

https://www.protectnatureto.org/wp-content/uploads/2019/10/Impacts-of-dogs-on-wildlife-Factsheet_PNTO_Oct_-2019.pdf

2.

Carbon pawprint: is man's best friend the planet's enemy?

<https://phys.org/news/2021-03-carbon-pawprint-friend-planet-enemy.html> (2021)

"Is your adorable puppy as bad for the planet as a gas-guzzling SUV? While the precise carbon pawprint of our pets is the source of scientific debate, one thing is becoming increasingly clear: lovable, they may be, cats and dogs have an impact on the planet."

In their 2009 book *"Time to Eat the Dog?"*, Brenda and Robert Vale sparked anger among pet owners for saying that the meat eaten by an average canine companion had twice the carbon footprint as driving an SUV 10,000 kilometres.

Footprint of a Pet

<https://www.zerosmart.co.uk/post/the-average-carbon-footprint-of-a-pet> (2022)

Since the start of the pandemic, a total of 3.2 million households in the UK have got a new pet. This now means that the country has 17 million pet-owning homes.

We all know pets are part of the family - but how good are they for the planet? Here is everything you need to know about your pet's carbon footprint and what you can do to reduce their impact on the climate.

Did You Know the Pet Food Industry Has a Huge Impact on the Environment? April 22, 2022

<https://www.mypawco.com/did-you-know-the-pet-food-industry-has-a-huge-impact-on-the-environment/>

The US pet food market reached a value of around US\$ 30 Billion in 2020.
Greenhouse emissions, Land use, Deforestation

3.

Is simply having more dog off leash areas – DOLAs - the answer for the problem related to non-compliance with the rules, escalation of conflicts and increasing impacts of dogs on nature/biodiversity of our green spaces?

Calgary case casts doubt on simply more DOLAs as being a solution:

- The 10 Best Off-Leash Dog Parks in Calgary

–“Calgary is one of the most dog-friendly cities in Alberta, with over **150 off-leash areas** in addition to many pet-friendly services like dog walkers, grooming businesses, and boutique stores with treats for pups.”

<https://www.housesincalgary.ca/blog/the-10-best-off-leash-dog-parks-in-calgary/>

-Wildlife groups say Calgary's off leash dogs causing problems <https://www.cbc.ca/news/canada/calgary/calgary-off-leash-dogs-1.6399337>

-Off-leash dogs could cause problems with Calgary's wildlife <https://calgary.citynews.ca/2022/03/29/calgary-dog-parks-off-leash/>

***Toronto ranked one of the top cities in the world for dogs**

<https://dailyhive.com/toronto/toronto-best-cities-for-dogs-2020> Toronto has made it on yet another list, this time in the “Best Cities for Dogs 2020,” and they’ve managed to make it into the top 10. According to a new study by Coxa, Toronto managed to make it right into the top 10 cities as good locations for our furry friends. Hanging onto ninth place, **Toronto scored an easy 88.67 out of 100, reigning as the only Canadian city to land in the best 10.**”

***Toronto has been ranked as the most pet-friendly city in Canada because**

obviously...<https://www.blogto.com/city/2021/12/toronto-ranked-most-pet-friendly-city-canada/>

After ranking Canadian cities based on their number of veterinarians, pet-friendly restaurants, pet-friendly hotels and of course, pet stores, the company determined that **Toronto is the best option for people moving to Canada from abroad.**

***2022 study by Luko revealed that Toronto was among the top ten most dog-friendly cities in the world**

<https://de.luko.eu/en/advice/guide/best-cities-for-dogs/>

Toronto is truly a world-class city in many regards, but did you know that it’s actually been recognized globally for its pet-friendliness? **A 2022 study by Luko revealed that Toronto was among the top ten most dog-friendly cities in the world.** It’s not hard to see why – the city is home to [over 230,000 dogs](#), has [over 114 pet shops](#) and 65 off-leash dog areas, and affords easy access to plenty of trails and parks. For this post, we’re exploring the Greater Toronto Area to compile our list of the top pet-friendly neighbourhoods, giving each a ranking based on the number of pet-friendly parks, shops and other amenities nearby.

***Toronto’s most pet-friendly neighbourhoods** https://liv.rent/blog/neighbourhoods/top-pet-friendly-neighbourhoods-in-toronto/#Torontos_most_pet-friendly_neighbourhoods

Relevant submissions to the City Council in respect to 2023.IE6.8 - Citywide Approach to Dogs Off-Leash Areas in chronological order starting with the most recent entry:

***(February 15, 2023) Letter from Clyde Robinson, on behalf of Ashbridge’s Bay Nature Stewards and Lenka Holubec, member of ProtectNatureTO (MPB.Supp)**

<https://www.toronto.ca/legdocs/mmis/2023/mpb/comm/communicationfile-165731.pdf>

Re: **Funding for a pilot project allocating Special Constables to patrol selected natural parks,**

{such as High Park- more than half of the park designated as the ESA (Environmentally Significant Area), the ANSI (Areas of Natural and Scientific Interest), the Grenadier Pond – Provincially Significant Wetland; or the Ashbridge's Bay Park (Natural Heritage System - to date over 714 species of flora and fauna have been documented)} **to enforce on leash rules and achieve compliance where this is critical to protect ecosystem from negative effects associated with the off leash dogs**

We are long-time advocates for Toronto's protected natural areas, ravines, shorelines, beaches and wetlands that support many native fauna and flora. This biodiversity can be only sustained if these natural areas are used by the public in consistency with the city adopted laws, while the city ensures these rules are implemented and enforced.

Proposed Funding for a pilot project allocating Special Constables to patrol selected natural parks to enforce on leash rules and achieve compliance where this is critical to protect ecosystem from negative effects associated with the off leash dogs is by no means a solution but only a baby step towards tackling the existing problems related to a lacking protection and unsustainable use of Toronto's remaining natural heritage. Yet, we believe that even this small step will result in more sustainable use and will bring significant ecological benefits, while increasing greatly all public enjoyment derived from nature.

OUR ASK:

To make selected parks better protected, we suggest introducing Special Constables to the By-Law staff as the Pilot program

We propose that regular/dedicated attendance by the Special Constables in selected pilot parks would achieve high compliance with the rules and this way cut down on negative effects associated with the off-leash dogs that are very significant - [Impacts of dogs on wildlife and water quality](#)

The current By-Law staff unfortunately does not have the proper authority to enforce the By-Laws that are in place, and therefore our taxes are not being properly spent. Nature and park users end up paying the price.

[Responsible Dog Ownership – Results of Consultation, November 10, 2015](#) "The study's findings show that in urban Canadian municipalities with very active ticketing and licensing enforcement the reported bite rate was much lower. This finding indicated to the authors that higher levels of enforcement led to a reduction in dog bites and it also led to more reporting by members of the public."

...

Yet, most of us are not aware that native species, and biodiversity in general, is not only threatened by invasive plant species by also by invasive alien animals.

Relationship between dogs and humans can be traced back to at least 15,000 years ago and with our human numbers growing now to 8 billion, dogs have propagated enormously, which resulted in science viewing dogs (and cats) as invasive mammalian species implicated in extinction and global biodiversity loss.

Recent report [State of the World's Birds](#) comes with [Invasive Alien Species List](#) **placing dogs at the top of chart together with cats as one of the leading cause of bird populations declines.**

...

The City Official Plan adopted a high level of protection regarding designated natural heritage.

[Toronto Official Plan Office Consolidation February 2019 Chapter 3,4 Natural Environment](#)

"Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas" (in respect to the ESAs and ANSI's)

[Toronto Municipal Code Chapter 608 Parks dogs prohibited areas](#)

A.Natural or environmentally sensitive areas (including designated ravines, wooded or savannah areas, sites of natural or scientific interest, areas which have undergone significant habitat restoration, wetlands or their buffer zones).

[Our Plan Toronto: Draft Environment and Climate Change Official Plan Policy Updates](#)

just recently proclaimed:

"The City of Toronto has a strong legacy of introducing leading-edge policies to protect the natural environment and address climate change...This Official Plan update emphasizes achieving net zero emissions and climate adaptation and reliance.

Protection and enhancement of the City's natural heritage system and water resource systems is a key element of climate adaptation and resilience."

***PH32.6 - Our Plan Toronto: Draft Environment and Climate Change Official Plan Policy Updates Planning and Housing Committee on March 25, 2022**

(March 25, 2022) Submission from Lenka Holubec, ProtectNatureTO and High Park Nature (PH.New)

<https://www.toronto.ca/legdocs/mmis/2022/ph/comm/communicationfile-146602.pdf>

Excerpt:

The ESAs in Toronto are currently only 4% of the city land. Big Cities have important role to play in climate/biodiversity crisis to support local and regional biodiversity and ecological systems from decline.

Toronto plays a critical role in the North American birds migration and this role was highlighted when the city has received last years from the Nature Canada Birds Friendly City Certification which comes with pride and obligation.

"The cities play a vitally important role in the survival of Canada's migratory birds." Graham Saul, the executive of Nature Canada

To ensure that protected natural places are here for future generations and actually work for nature, we must ensure that all good intentions and mandatory policies are translated from the text of policies, such as the Provincial Policy Statement and the City Official Plan, into daily reality - on to the ground of our busy ESA/ANSI/PSWs.

The ESAs in Toronto are currently only 4% of the city land. Big Cities have important role to play in climate/biodiversity crisis to support local and regional biodiversity and ecological systems from decline.

Over the past years, we have learnt the hard way, that most of our protected areas actually are lacking this protection on the ground and that the policy fundamental requirement: ***"Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas."*** really exists only on the paper of policies.

Management plans for Toronto's ESAs at this point are mostly not present, while management of public use is largely absent. This fact, in correlation with rapidly growing city, has negatively affected protected natural areas capacity to preserve the very natural features and ecological functions why these areas received their protected status.

This clearly means that impacts of recreational activities, having a potential to affect protected areas negatively, needs to be monitored/discontinued when conservation and biodiversity are affected. This may apply in some ESAs to dog walking, groups/gathering activities, sports, overnight camping, filming activities, recreational fishing (Grenadier Pond/Provincially Significant Wetland), etc.

Protection is founded on precautionary principle that is to prevent harm. Protected areas management is to ensure that this prevention of harm is prioritize over other considerations and recreational uses that potentially impact negatively protected natural features and ecological function reducing biodiversity.

***MM31.22 - Officially Recognizing Toronto as a Certified Bird Friendly City**

Communications (City Council)

(April 7, 2021) Letter from Lenka Holubec, Member, ProtectNatureTO (MM.New)

<https://www.toronto.ca/legdocs/mmis/2021/mm/comm/communicationfile-130438.pdf>

...

"The City of Toronto is an annual stopover location for thousands of migratory birds. Seasonal migration is a critical component of many birds' life cycles in North America, and elsewhere, and yet this phenomenon is often overlooked as an important consideration in habitat and wildlife conservation initiatives. The diversity and abundance of birds that continue to migrate through Toronto means that the City has both an opportunity and a responsibility to support the safe passage of these birds. The City has already

begun to undertake a number of initiatives targeted at migratory bird conservation (e.g., Bird-friendly Development Guidelines, Bird Flyways Project). The purpose of this report is to summarize the current understanding of bird migration, analyze the available data on migratory birds in the City, and develop recommendations to build on existing migratory bird conservation efforts based on the findings of this report." [Migratory Birds in the City of Toronto, A Literature Review & Data Assessment, FINAL REPORT August 2009 DOUGAN & ASSOCIATES](#)

Recently published "*The first-ever [Comprehensive assessment of net population changes in the U.S. and Canada reveals across-the-board declines that scientists call "staggering."](#)*"

Common birds—the species that many people see every day—have suffered the greatest losses, according to the study. More than 90% of the losses (more than 2.5 billion birds) come from just 12 families including the sparrows, blackbirds, warblers, and finches."

The motion by Councillor Mike Layton, seconded by Jennifer McKelvie "**Officially Recognizing Toronto as a Certified Bird Friendly City**" is an important step in the City of Toronto's "*opportunity and a responsibility to support the safe passage of these birds*".

*Nordheimer Ravine-PNTO submission

Excerpts:

Sir Winston Churchill Park and the Nordheimer Ravine—Proposed DOLA, 2019

ProtectNatureTO is an umbrella group advocating for the protection of wildlife and natural areas across the City of Toronto. Our group includes representatives from a number of Toronto-based nature and stewardship groups. We connect with other nature organizations, scientific experts and concerned individuals in Toronto and beyond.

A Dog Off-Leash Area (DOLA) may not be replaced on the previous site on top of the St. Clair Reservoir in Sir Winston Churchill Park because it violates provincial standards for safe drinking water. A new DOLA is proposed for a portion of the park which is designated ravine and is within 25 metres of the Nordheimer Ravine Environmentally Significant Area (ESA). The western approach would be through the ESA itself.

ProtectNatureTO believes there should be no dog off-leash area within the designated ravine in Sir Winston Churchill Park. Our opposition is based on a careful review of existing policies and consideration of the negative environmental impacts. Since the proposal notes that all other parts of the park are ineligible, there should be no DOLA in Sir Winston Churchill Park.

The Parks By-Law 608-34- A (2) bans dogs from prohibited areas. No off-leash facility should be contemplated in an area which is prohibited to dogs.

Everybody values nature. Consequently, we have strong policies in place to protect it from harm.

Dogs in large numbers such as are found in cities are destructive of the nature, we all love so much. They disturb wildlife and alter soil chemistry. When off-leash as so many dogs are, they trample vegetation, compact the soil, and spread invasive seeds.

Protective measures are embedded in planning policies, from legislation such as the Planning Act to the Provincial Policy Statement 2014 (PPS 2014) to the Official Plan of the City of Toronto. Consistent with these high-level policies is the Parks By-Law cited above.

The PPS 2014 mandates that the natural heritage shall be protected for the long term. This is unusually strong wording as many policies allow for municipal discretion through the Official Plan. To aid municipalities in meeting their obligations, the province has produced a guideline, the Natural Heritage Reference Manual (NHRM, or Manual). The Manual provides the province's best technical advice for the protection of natural areas.

However, planning policies are so complex that key features may be overlooked in implementation. This is true even though many City policies such as the Parks By-Law already embed natural heritage protection. End of excerpt

[*Nordheimer Ravine Proposed DOLA Comments Dec 4,2019 Lenka Holubec PNT0](#)

Excerpt:

“Toronto’s natural areas and wildlife habitats are under significant stressors related to rapid intensification and increasing number of pets, while at the time size of the parkland is finite and biodiversity declining.

Protecting remaining natural heritage system to retain it’s the ecological function and enhance biodiversity is crucial for the city’s continued sustainability.

Establishing of DOLA in the proposed location (Nordheimer Ravine, the ESA) would, in my opinion, conflict or not to conform to several of the policies instituted to protect natural heritage system in the city for the long term.

[Toronto Municipal Code Chapter 608 Parks dogs prohibited areas](#)

A. While in a park, no person as owner or person having control of a dog shall: [Amended 2007-07-19

by By-law 790-2007;30 2009-10-27 by By-law 1093-200931]

(2) Excluding person with a disability accompanied by a service animal, and a working dog providing a service to the City, **allow the dog to enter a prohibited area; [Amended 2016-11-09 by By-law 1073-201632]**

PROHIBITED AREAS: [Added 2007-07-19 by By-law 790-200713]

A. Natural or environmentally sensitive areas (including designated ravines, wooded or savannah areas, sites of natural or scientific interest, areas which have undergone significant habitat restoration, wetlands or their buffer zones).

Establishing of new DOLA in the proposed location constitutes site alternation in the natural area adjacent to ESA

Dog walking is not a minor recreation activity and establishing of DOLA has a major impact on the natural area and entire adjacent area.

Dogs have complex negative impacts on natural areas, wildlife and water as research shows [Impacts of dogs on wildlife and water quality](#).

Conclusion:

With increasing intensification of the city and escalating user pressures on the parks and designated natural areas (ESA/ANSI. designated ravines), it is crucial to implement as a minimum requirement existing policies guiding natural heritage in relation to the land use decisions.

In this respect any decision on establishing of new DOLA’s, reviewing of existing DOLA’s, on public access, regarding non-compatible recreation activities, etc. has a potential to support or undermine the city natural heritage and biodiversity.

Recent efforts such as Toronto Ravine Strategy and Biodiversity Strategy stress PROTECT as prime principal together with Ecological Integrity, restoring and enhancing of remaining natural heritage system.

Establishing of DOLA’s in or adjacent to ESA/ANSI and the Ravines regulated by Ravine and Natural Feature Protection By-Law - Municipal Code Chapter 658, is in conflict and not consistent with the provincial and municipal policies guiding protection of natural heritage. Dog walking is not a minor recreation activity as dogs off leash and even on leash have complex negative impacts on natural areas, wildlife, water quality and biodiversity as research overwhelmingly shows. End of excerpt