

**2023.MPB4.1, 2023 Operating and Capital Budgets, Clyde Robinson and Lenka Holubec Letter**

Feb 15, 2023

VIA E-MAIL: [councilmeeting@toronto.ca](mailto:councilmeeting@toronto.ca)

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**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**

Dear Mayor Tory, Deputy Mayor Jennifer McKelvie and Toronto City Councillors,

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 - see [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."*

**We are simply asking for the city adopted By Laws to be observed.** We and nature rely on these laws as nature can neither speak up for itself nor protect itself. We tend to think nature is doing fine until it is gone.

Urbanites suffer nature-deficit disorder and higher levels of mental illness. Starting Feb 2021, Ontario health-care providers can offer prescriptions for nature [Ontario doctors set to turn over a new leaf with program that lets them prescribe 'nature' to ailing patients](#) ***"A patient with depression, for example, may now be prescribed 20-minute daily nature outings by their family physician in addition to other therapies."***

Toronto's nature is amazing. Our ravines, waterfront parks, protected natural areas provide for a wide range of native species. It is also worth noting that our city is critical for the North American birds migration. As we are becoming aware about birds and other species rapid decline as highlighted in [State of the World's Birds](#) and [Living Planet Report](#), we also pay more attention to the dual crises of human-induced climate change and the catastrophic loss of biodiversity happening to our planet.

In 2021, ***"the City of Toronto was recognized by Nature Canada for its efforts and leadership in urban bird conservation by being awarded a high-level certification as a bird-friendly city"*** - [City of Toronto receives Bird-Friendly City certification from Nature Canada](#). Recognition as [Bird Friendly City](#) comes with obligation such as addressing of ***"Disturbance of birds at natural areas or important bird habitat"***.

Toronto's public and most of this Council's members are by now fairly familiar with the city's efforts to keep the plant invasive species at bay – restorations - to give native plants a better fighting chance to thrive. Over the course of Toronto Ravine Strategy and the past and present budgets proposals for funding of dealing with invasive weeds have become a regular feature.

**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.**

According to [Biodiversity in Canada, Commissioner of the Environment and Sustainable Development, Commitments and Trends](#) there are 5 principal threats to biodiversity:

- Habitat loss and degradation...
- **Invasive alien species can include plants, animals, and diseases** that can outcompete or kill native species and destroy or alter habitat.
- Overexploitation...
- Pollution ...
- Climate change affects biodiversity by altering the environmental conditions that species have evolved or adapted to rely on...

Over the years, the city spent many efforts to designate natural heritage (the ESAs, about 4% of city land) and develop policies and strategies such as [The Toronto Ravine Strategy](#), [Biodiversity Strategy](#), [Final Parkland Strategy Report](#) to protect, restore and enhance remaining city nature.

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](#)

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

[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.”***

Toronto's natural parks, in particular the protected areas (the ESAs) and sensitive wildlife habitats, such as those providing for the ground nesting birds, cannot support biodiversity without management of public use - protection.

Our native wildlife especially pays a very 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.

Compliance with the on leash rules is a bare minimum for the natural parks to support biodiversity and the public enjoyment of nature.

Yours Sincerely,

Clyde Robinson, on behalf of *Ashbridge's Bay Nature Stewards*

Lenka Holubec, member of [ProtectNatureTO](#)

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**To the Budget Committee:**

*As a conservation biologist specializing in at-risk species and ecosystems, I would like to share my strong support for the proposal submitted by ProtectNatureTO. Off leash dogs cause many harms to ecosystems including: changing the chemistry of the soil through urine, spreading neonicotinoids pesticides through feces (used as flea treatment and very toxic to aquatic invertebrates and pollinators) and scaring declining wildlife like snakes and even bumblebee queens looking for nesting sites. Additionally, the high number of off-leash dogs, especially along the waterfront and in the ravine systems since the pandemic, has made the city's green spaces much less accessible to families with small children, people with disabilities and elderly people.*

*It is critical the city enforces bylaws either for keeping dogs on leashes and/or restricting them entirely from sensitive ecosystems.*

Thank you,

**Sheila R. Colla, Ph.D. Associate Professor , York Research Chair in Interdisciplinary Conservation Science Faculty of Environmental & Urban Change, York University**

## Background:

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

Applies to designated natural areas, the ESA/ANSIs “Activities will be limited to those that are compatible with the preservation of the natural features and ecological functions attributed to the areas”

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

#### § 608-34.2 Dogs

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).

### [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."

### [List of references to off leash dogs impacts in High Park – Terrestrial Biological Inventory, TRCA, 2019.pdf](#)

[High Park – Terrestrial Biological Inventory](#) includes about 20 references to dogs, such as:

*“The main disturbances affecting High Park at present are intensive trampling from park visitors and **off-leash dogs** in upland habitats, and storm water runoff in the wetlands and riparian areas causing nutrient loading and flash flooding. Other threats include storm damage to forests that are lacking native regeneration, insect outbreaks, and invasive species.” Pg. 52/53*

*“**The abundance of dogs-off leash** found outside the fenced in dog park at Dog Hill may be contributing to the lack of ground nesting birds.” Pg. 53*

*Hikers and dog-walkers are intensive users of the site. The fenced dogs-off leash area on Dog Hill is well constructed and accommodates and manages many dogs, however **many owners walk their dogs off-leash outside this designated area. Leash laws may need be enforced outside designated areas.** Where off-leash dog use occurs (regardless of whether it is officially permitted or is not), there is a considerable risk of disturbance to low and ground-nesting birds and herpetofauna such as American toad and gartersnake in upland foraging habitats. Trampling has also had a severe impact on the Spring Road Ravine, which has sensitive forest plants along the east side between Howard Pond and High Park Blvd (see Map 11a). Such disturbance would result in reduced abundance and possibly eventual extirpation of these species. If resources are limited for enforcement of leash laws, the patrols can be targeted in areas where there are high concentrations of L1-L3 species and communities.” Pg. 55*

### [Impacts of dogs on wildlife and water quality](#)

Metro Regional Government, Portland, Oregon, Lori Hennings, Senior Natural Resource Scientist  
The evidence that dogs negatively impact wildlife is overwhelming.

**Impacts include:**

- “1.The presence of dogs causes wildlife to move away, temporarily or permanently reducing the amount of available habitat in which to feed, breed and rest.
2. Disturbance and stress response. Repeated stress causes long-term impacts on wildlife including reduced reproduction and growth, suppressed immune system and increased vulnerability to disease and parasites.
3. Indirect and direct mortality – Dogs transmit diseases (such as canine distemper virus and rabies) to and from wildlife. Loose dogs kill wildlife.
4. Human disease and water quality impacts - Dog waste pollutes water and transmits harmful parasites and diseases to people.”

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[West Woodbine Beach, Dune and Meadow Habitat, Biodiversity and Damage report Summer 2022](#)

Report prepared by: Noam Markus & Clyde Robinson  
 Updated: Oct 11, 2022, Summary

This report documents the rich biodiversity found within the habitat at West Woodbine Beach in Toronto, Ontario. The observations have been by citizen scientists, confirmed by local experts and through iNaturalist. It is hoped that this report will help the public and Toronto City Hall officials, be more aware of the rich biodiversity within the habitat as there is no current Environmental Assessment and no official plant inventory by Toronto and Region Conservation Authority (TRCA).

To date over **714 species** of flora and fauna have been documented.

[Big cities have a major role to play in protecting biodiversity, experts say](#)

Cities to take spotlight at the UN biodiversity summit

*“While they're traditionally viewed as concrete jungles rather than natural oases, cities are increasingly taking a leadership role when it comes to protecting biodiversity.”*

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[Ontario doctors set to turn over a new leaf with program that lets them prescribe ‘nature’ to ailing patients](#) *“A patient with depression, for example, may now be prescribed 20-minute daily nature outings by their family physician in addition to other therapies.”*

[How Canada's biggest cities are losing their green space](#)

Canada biggest cities have lost their green spaces at staggering rates over the past two decades, new data from Statistics Canada has revealed