



March 15, 2025

To the members of the Economic and Community Development Committee,

**Paws for Parks Submission EC18.8 – Developing an Urgent Downtown Coyote Action Plan**

Paws for Parks (“PFP”) is a community-based volunteer organization that promotes environmental protection and sharing of our public parks through responsible pet-walking practices. Formed in 2022 in response to an increasing number of off-leash dogs in on-leash areas in High Park, PFP has been working with City of Toronto By-Law and Toronto Animal Services on community outreach and education regarding the importance of keeping pets leashed outside of designated off-leash areas.

We are writing with respect to Item EC18.8 regarding a coyote action plan for downtown Toronto. Our members are comprised of Toronto residents who love both nature and dogs and who wish to see a response from the City that is effective and respectful of both law-abiding dog owners and wild canids. The recent negative coyote-dog interactions in Liberty Village were a reasonably foreseeable consequence of the increase in the number of dogs in the City and the lack of effective enforcement of existing City of Toronto leash by-laws. In addition, the feeding of coyotes (purposeful or inadvertent) and the removal of habitat around Ontario Place has contributed to the problem.

We would point you to Coyote Watch’s explanation of trigger-stacking in coyotes found in their submission on this item and we support their detailed approach to managing coyote interactions as set out in their submission<sup>1</sup>.

We receive regular reports of off-leash dogs (outside of off-leash areas) chasing coyotes in High Park and we are also seeing the natural consequences of that in a number of negative interactions between coyotes and domestic dogs this winter in Ward 4.

The items that we advocate for the Coyote Action Plan to include are:

1. **Non-Lethal Approaches**

As set out in Coyote Watch’s submission, euthanizing or relocating coyotes would not be effective in resolving the problem and is inhumane. Those ecological niches will simply be filled by other coyotes and, so long as the human behaviours remain the same, the problems will continue.

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<sup>1</sup> [Coyote Watch Canada Submission](#)

## 2. Meaningful Off-Leash Enforcement

There are a large number of dogs being exercised off-leash in the affected area. Recent ramped up enforcement by by-law officers has inexplicably been met by resistance from some dog owners in the area. If dog owners are not willing to acknowledge that they are contributing to the problem and to adjust their activities, these negative canid interactions will continue regardless of what other steps the City takes to address coyotes in the area. The fact that some dogs were attacked while on-leash is being used as evidence that off-leash dogs are not a problem, when in fact previous negative interactions with off-leash dogs can lead coyotes to have future negative reactions to dogs, whether on-leash or off.

Increased and effective off-leash by-law enforcement is needed. By-Law officers do not have the ability to require the production of identification which they need to issue tickets and fines. This results in a situation where those violating off-leash by-laws simply ignore by-law officers and walk away with very few tickets issued. In 2022, nearly 6,000 complaints about off-leash dogs were registered with the city and only 50 tickets were issued<sup>2</sup>. As there are no consequences for failure to abide by our by-laws, the law-breaking environment flourishes, encouraging more people to engage in the behaviour as it becomes the norm. We recommend that as part of the Action Plan, Toronto By-Law Officers be given Special Constable status which would allow them to require the production of identification and therefore issue tickets and meaningfully enforce our by-laws.

## 3. Community Education and Monitoring

Wider community education regarding normal coyote behaviours and aversion conditioning is needed. Leveraging the expertise of Coyote Watch Canada and Toronto Animal Services in dealing with the harder cases of habituated coyotes has worked in past and can work now. Having a by-law officer on regular duty in the area to remind dog owners of the on-leash rules and the reasons for them may be necessary at least until the social norm of leashing dogs is re-established.

## 4. Thoughtfully Designed Off-Leash Areas

In the absence of convenient and well-designed off-leash areas, dog owners will naturally be more inclined to let their dogs off leash in non-designated areas. To ensure that taxpayer money is not spent on underused or unused off-leash areas, any new off-leash areas or upgraded existing areas should be designed with international best practices in mind, including without limitation for surfacing, shade, layout, and accessibility. Consideration should be made for providing areas for smaller dogs, as in our community outreach we often hear that our off-leash areas are not safe for puppies or smaller dogs.

Investments in existing off-leash areas should be made to ensure that they are well-maintained with intact fencing tall enough to keep dogs from jumping out. To facilitate proper use and enforcement, off-leash areas should be required to have clear, visible boundaries to make them easier to control and maintain.

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<sup>2</sup> [Katie Daubs, Toronto Star, Sept 2, 2023, "Does Toronto Have a Dog Problem?"](#)

## 5. Signage

Coyote and off-leash dog signage should be clearly visible and placed at all key entry points to the area. Current off-leash dog signage is often out-of-date and/or not engaging to the public. Signage should include information about the reasons we keep our dogs on-leash (including coyote specific information in affected areas). Signs should include understandable graphics for those for whom English is not a first language. There should be no public confusion about whether one is in or outside of an off-leash area.

We understand that some of the recommended actions will require additional financial resources and would suggest that the City look to improving the currently low dog licensing rates in order to assist with bearing these costs.

We thank you for your time in taking steps to address the challenges in the impacted areas. It is important that these steps include proven methods to shift public behaviour toward a culture of compliance and respect for their communities and the natural world. In that regard, we would point you towards Community Based Social Marketing methods which are evidence-based ways to create positive changes in human behaviour as set out in Dog McKenzie-Mohr's book *Fostering Sustainable Behaviour*<sup>3</sup>.

Regards,

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<sup>3</sup> [Fostering Sustainable Behaviour, Doug McKenzie-Mohr](#)