

**EC18.8 - Developing an Urgent Downtown Coyote Action Plan, Feb 26, submission Lenka Holubec**

February 26, 2025

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**Re: EC18.8 - Developing an Urgent Downtown Coyote Action Plan**

Dear Chair Alejandra Bravo, Vice Chair Shelley Carroll, and all Committee members,

Thank you for this opportunity to comment on EC18.8 - Developing an Urgent Downtown Coyote Action Plan.

EC18.8 - Developing an Urgent Downtown Coyote Action Plan Summary:

***“In advance of the City’s planned updated Coyote Strategy slated for Q4 2025, in recognition of the unique nature of our highly-populated downtown communities with limited green space and the emerging crisis of attacks on and deaths of dogs, as well as understandable fear from families and dog owners, action must be taken. I have been working with local residents to address this issue with urgency to address this issue, and more must be done.”***

Coyotes are an important native wildlife playing a significant beneficial ecological role in our growing cities.

*“Coyotes are a key part of urban and rural ecosystems throughout Ontario. They balance animal populations, control rodents and ticks and keep grazing animals moving on the landscape like rabbits and deer. [Why are we hearing more about coyotes in Ontario cities and towns and how can we learn to live with them?](#)”*

- Coyotes cannot be victimized for being misplaced as a consequence of government action causing the destruction of a vital urban wildlife habitat and a potential harm to a wide range native species. The loss of the Ontario Place habitat has considerably impacted the entire Toronto’s waterfront-adjacent ecosystem.
- The other part of the issue behind *“the emerging crisis of attacks on and deaths of dogs, as well as understandable fear from families and dog owners”* relates to the City’s many years of INACTION to develop and execute management action plan in respect to “dogs in city”.

**Recommendation:**

**Any Coyote Action Plan cannot resolve the issues involved here, unless the City makes a priority of urgently embarking on a robust “Dogs in City Action Plan” focusing on human behaviours as the root cause of the human-wildlife conflict, rising numbers of dog bites to people and pets, and the impacts of dogs on wildlife, biodiversity and environment.**

**This prolonged inaction and absence of an efficient “Dogs in City Action Plan” has resulted, among other things, in normalizing non-compliance with on-leash laws, a rise in dog bites, low licensing rates, and basically an out-of-control dog population in the intensifying city with a scarcity of green spaces.**

## Issues

- “Developing an Urgent Downtown Coyote Action Plan Summary” as proposed now, seems to be lacking in the root causes of the very unfortunate situation apparently driven by human actions/behaviours, while coyotes are reacting to stresses.

[\*Liberty Village Coyote Update, Coyote Watch Canada, Feb 5, 2025\*](#)

*“We’ve received countless reports of off-leash dogs chasing/harassing coyotes.*

*“People in the community are feeding wildlife causing coyotes to be more tolerant of people and increasing their proximity to high activity areas.*

*“Land use access has changed with population growth, temporary living shelters, off leash dogs and wildlife.*

*“Off-leash dogs are being seen as a threat by coyotes because of all these choices made by pet guardians in the area. The coyotes are under constant pressure from the dogs – but this is not the fault of dogs or coyotes. Given the extreme pressure, coyotes may react to dogs who are on leash as a result”.*

- The situation is strongly impacting those affected - the owners of dogs succumbing to injuries. Nevertheless, “Developing an Urgent Downtown Coyote Action Plan” should be dealing with the events from a wider perspective, not in isolation of context. The issue needs to be viewed within the context of the entire dogs in city problematic.

The likelihood of our pets, children, general public, green spaces, biodiversity being harmed by coyotes are very low, while the same cannot be said about the rising numbers of dog bites, harm and impacts on urban wildlife, green spaces and public spaces in general.

- Almost exactly a year ago, this committee was dealing with [EC10.2 - Response to EC6.9 - Incident and Operational Review of Serious Dog Attacks, March 20, 2024](#) and how to prevent a rise in dog bites and harm done by “dangerous dogs” and irresponsible dog owners.
  - **“City staff said Tuesday there are about 300,000 dogs in Toronto and roughly 2,000 owners with active DDOs.”** (dangerous dog orders) [After high-profile maulings, stricter rules for dangerous dogs could be coming to Toronto, Feb 24, 2024](#)
  - **“A year (2023) where the city has noted a 39 per cent rise in reported dog bites, a year of growing unease about off leash-dogs and irresponsible owners, a year of rising tension about who has a right to enjoy Toronto’s green spaces. And a year of wondering whether the city is capable of handling this very messy coexistence”** [Does Toronto have a dog problem? With a rise in attacks — and tensions — some say the rules to keep everyone safe aren’t working](#)
  - **“Last year, Animal Services received 2,726 calls to investigate potentially dangerous altercations. In response, city staff asked that the 2025 budget earmark \$500,000 for awareness efforts. City council has ramped up its dangerous-dog protocols, making the dangerous-dog database public for the first time. The number one ward for dangerous dogs in the city is Toronto-Danforth, followed by Scarborough Southwest and Beaches–East York.”** [Don’t Worry, She’s Friendly! TorontoLife, July17,2024](#)

- **A loss of biodiversity, as a consequence dogs impacts on fauna and flora at Toronto's protected natural areas - [The Environmentally Significant Areas \(the ESAs\)](#) , never really made it to the news but has been significant enough to inhibit some species.**

In times of an escalating biodiversity crisis, this is a problem: *"The main disturbances affecting High Park at present are intensive trampling from park visitors and **off-leash dogs** in upland habitats"* [List of references to off leash dogs impacts in High Park – Terrestrial Biological Inventory, TRCA, 2019.pdf.](#)

*"To summarize: the National Invasive Species Information Center defines an invasive species as non-native to the ecosystem in which it appears.*

*"The Global Invasive Species Database states that domestic dogs threaten a total of 200 IUCN Red List species. Thirty of these species are classed as critically endangered, 71 are listed as endangered, and 87 are listed as vulnerable. Dogs have contributed to the extinction of nearly one dozen wild bird and animal species. Feral dog populations or domestic dogs left to roam are the biggest perpetrator of these issues. As such, dogs have become the third worst human-introduced predator after cats and rats."* [Pets as Invasive Species: Dogs,BiodiversityCenter,UofTexasatAustin, May31 2023](#)

**Without a robust science-based education and direct language, dog owners fail to comprehend why they must comply with the leash laws in natural areas, unless there is some perceived danger to their pets or themselves, such the presence of coyotes.**

The City agencies (TAS, etc.) have so far been avoiding direct/relevant information education for dog owners, which has resulted in no tangible results in terms of improving compliance with leash laws but also the overall awareness of dogs impacts:

*"Wild animals perceive dogs as predators. The frequent presence of dogs in natural areas may indirectly cause harm or even death through displacement to less desirable areas, reduced feeding, and increased stress, especially in young animals or pregnant females. Uncontrolled dogs may also kill wildlife directly or injure them enough to cause subsequent death. Dog urine in sensitive wildlife habitats "marks" the territory, which can make it unsuitable for wildlife. Furthermore, dog scent repels wildlife even after the dogs are gone. Allowing dogs off-leash or off-trail increases the risk of injury to the dog as well as disease transmission to/from wildlife (e.g. canine distemper) and even to humans (e.g. Lyme disease). Both migratory and resident birds may be disrupted by dogs; ground nesters and shore birds are especially vulnerable."* [Dogs in Natural Areas](#)

- **Efforts to develop "Urgent Downtown Coyote Action Plan" may not achieve desirable results, in the absence of a proper and robust management action plan to deal with "dogs in the city" at the level of responsible dog ownership, effective enforcement to reverse now normalized non-compliance with the on leash laws, a vigorous science-based education and measures in respect to "dangerous dogs", bites, etc., injuries to other members of public, and a proper science-based education on the impacts of dogs on wildlife.**

*"Like all coyote situations we have been made aware of since we opened in 1993, this situation again seems to have been caused by human actions – which is what needs to be addressed. Destruction of their habitat, being chased and / or frightened by off-leash dogs (which is against the city by-law in this area), and feeding of these coyotes has created a difficult situation for all."* [Fort York & Liberty Village Coyote Situation, Toronto Wildlife Centre Press Release, February 13th, 2025](#)

[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."*

*Apparently, the considerable numbers of the off leash dogs in around the areas where coyotes attacks have taken place were reported off leash despite of education provided by the city:*

*"In a statement to CityNews, Shane Gerard Senior Communications Coordinator for the City of Toronto said bylaw officers on patrol handed out 16 tickets to those with off-leash dogs in the area over the weekend of Feb. 1 and 2 alone, which come with a hefty \$615 fine. To put that in context, in all of 2024, only 25 tickets were issued for the same bylaw infraction in the entire ward."*

*While most recent attacks have been on dogs that were leashed, the City of Toronto believes off-leash dogs in undesignated areas are contributing to coyote attacks. As with all bylaws, the first step is education and collaboration. If the issues continue despite education, then further enforcement action such as fines may be required to bring dog owners into compliance with their responsibility to keep their dogs leashed."*

[Protecting their pack: Liberty Village residents band together to stay safe from coyotes, February 7, 2025](#)

The fact that the City has not been enforcing the leash laws for years has likely contributed to the current crisis. We would likely face many more accidents if the speeding laws were not enforced.

- [Does Toronto have a dog problem? With a rise in attacks — and tensions — some say the rules to keep everyone safe aren't working](#)  
*"The city favours an education approach, because people are not legally obligated to give their information to a bylaw officer. Many walk away, leash their dogs, and tip off approaching friends to the blitz. Last year, nearly 6,000 complaints about off-leash dogs were registered with the city. Fifty tickets were issued"*
- **Presently, the city does not really know how many dogs and what kind of dogs live in the city, since licensing rate remains stubbornly around 30% over many years.**

*"The estimate is about 30 per cent of dogs and only 10 per cent of cats are licensed, Mary Lou Leiher of Toronto Animal Services said." Leiher declined to answer if there should be more effort put into enforcing the bylaw. "A fine is always the last resort" she says. The city is planning an education blitz in the new year to convince more pet owners to get a license."* [Less than one third of dogs in Toronto are licensed. Posted October 3, 2014](#)

The city is providing for years the information that there is more or less 300,000 registered/licensed dogs in the city, while both the human and pets population grew significantly.

*"Furry hordes are taking over our parks, schoolyards and streets. The near-impossible challenge of living cheek by drooling jowl in a dog-mad, mad-dog city"*

*"Ten years ago, there were some 300,000 dogs in the city—roughly one pooch for every 10 people. Since then, Toronto has grown exponentially, and so has its dog population: based on recent national data, the city is now home to 610,000 canines, more than one and a half times the number of children 14 and under."* [Don't Worry, She's Friendly! TorontoLife, July17,2024](#)

Sincerely,

Lenka Holubec, member of [ProtectNatureTO](#)

**Recent submissions to the City Council on related issues:**

<https://secure.toronto.ca/council/agenda-item.do?item=2024.EC10.2>

**EC10.2 - Response to EC6.9 - Incident and Operational Review of Serious Dog Attacks**

(March 20, 2024) Submission from Lenka Holubec, ProtectNatureTO (CC.New)

<https://www.toronto.ca/legdocs/mmis/2024/cc/comm/communicationfile-178192.pdf>

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<https://secure.toronto.ca/council/agenda-item.do?item=2023.IE6.8>

**IE6.8 - Citywide Approach to Dogs Off-Leash Areas**

(September 20, 2023) Letter from Lenka Holubec (IE.New)

<https://www.toronto.ca/legdocs/mmis/2023/ie/comm/communicationfile-172288.pdf>

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<https://secure.toronto.ca/council/agenda-item.do?item=2023.MPB4.1>

**MPB4.1 - 2023 Operating and Capital Budgets**

(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>