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Subject: [External Sender] My comments for 2025.EC20.4 on May 6, 2025 Economic and Community Development Committee
Date: May 6, 2025 7:56:16 AM

To the City Clerk:

Please add my comments to the agenda for the May 6, 2025 Economic and Community Development Committee meeting on item 2025.EC20.4, Downtown Coyote Action Plan

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

Comments:

<https://secure.toronto.ca/council/agenda-item.do?item=2025.EC20.4>

Please make this comment readable to the public. Please post it as a PDF.

<https://www.change.org/p/protect-the-liberty-village-coyotes-in-toronto>

While I am happy Toronto is emphasizing non lethal methods, I have concerns over the lethal options. Also, the comments in the report contradict themselves, as I carefully point out.

“Deterrence (Aversion Conditioning, Habitat Modification, Public Education) Goal: Non-lethal means of deterring coyotes so they do not remain in place • Consistent with best practices used in other jurisdictions • Requires public participation to be effective • Is a cost-effective long-term strategy • Requires intensive staff resources to implement”

“The City should immediately hire a specialized aversion conditioning team to assess the coyotes, apply adaptive aversion, and monitor results to determine if coyotes with problematic behaviours are present (i.e. do not display avoidant behaviours when confronted) and escalation is warranted.”

Coyote Watch Canada is an excellent organization. They provide hazing and humane assistance. However, a hunter/trapper may be biased towards killing. Therefore, they are more likely to claim an escalation has happened. The recent hiring of Critter Gitter, a hunter trapping company, is very alarming.

“The teams should also assess for food attractants and contributing factors to heightened activity.”. That should be the first thing done.

“• Killing: Cannot cause unnecessary suffering and cannot be implemented using adhesives or poison.”

Adhesives and poison are the biggest driving factors in the recent encounters with the Liberty Village Coyotes. “The area attracts rats in two ways: (1) a high amount of dog excrement on the ground uncollected by pet owners and (2) rat bait boxes situated at all surrounding buildings. Coyotes feed on rats and are in turn attracted to the area.”.

The presence of rats is determined by exterminators using adhesive traps. This is horrendous. Bait used is anticoagulant that goes right up the foodchain. The weakened rats are easy to catch, the coyotes are poisoned sublethally, and are more prone to mange. People then attempt to help by feeding the coyotes.”

“Removal (Lethal) Goal: Selective lethal means of removing coyote(s) from problem area • Requires engaging a licensed hunter/trapper and the support of the Toronto Police Service (TPS) given the use of a firearm, if planned ahead of time (TPS does not hunt and will only dispatch an animal posing a safety risk in real time) • Removal must be animal-specific, as research shows that the indiscriminate removal of coyotes can cause a rebound effect with larger litters and expanded territory sizes 12 • May require restricting public access to the area for the entire duration of the process to protect public safety • May be distressing for members of the public who view removal • Has animal welfare implications (coyotes can maim themselves to escape, pups are left behind if a parent is removed)”. “Should the criteria for escalation be met, the most humane and safe practice would be to identify the problematic coyote(s) and selectively kill by firearm.”

Since when are firearms humane or safe? Recently two dogs in Elgin were shot dead by a coyote hunter. There is nothing humane about shooting, as pointed out before. Please take hiring a hunter for lethal removal by firearm permanently out of the toolbox.

“Trapping: Must comply with all prescribed humane and precise technical standards and must generally be carried out by licensed agents (for example, trappers, hunters).”. “Trapping (Lethal) Goal: Humane lethal means of removing coyote(s) from problem area • Requires engaging a licensed hunter/trapper • May require restricting public access to the area for the entire duration of the process to protect public safety • May be distressing for members of the public who witness trapping • Netting a coyote requires being in the right location at the right time to be successful • Using a leghold trap carries the risk of capturing an unintended being, such as another animal or person • Has animal welfare implications (coyotes can maim themselves to escape, pups are left behind if a parent is removed)”

This is very contradictory. The above says “humane lethal means” but then rightly points out lethal trapping is never humane. There are no humane standards for snares. They injure or strangle the animals. Relaxing snares, while intended to restrain, still often injure the animals. Humane standards for leg hold traps and killer Coneybear traps are determined by trapping animals, putting them in a laboratory, trapping them with the test trap, then killing and dissecting them. Really inhumane experiments that only show how the trap works on a target animal, in a cage. Many non target animals wind up in the traps, including pets.

“• Relocating: Permitted within 1-kilometre of the trap site for wild animals. In the case of coyotes, however, this option is reserved for rare situations (for example, rehabilitating a young, injured coyote, and a sanctuary is available to care for

them long-term). This is because wild canids have large territories, with eastern coyote territory in particular ranging from approximately 13 to 65 square kilometres.” “Relocation* Goal: Non-lethal means of removing coyote(s) from problem area • New/different green space must be available • Government of Ontario limits relocation to 1 km of trap site and this option is only rarely used for wild canids • Coyotes are territorial and may return to trap site • If successfully relocated, may be killed by other coyotes that lives on the territory they were placed in • If successfully relocated, may engage in problematic behaviour against people in the new area or model such behaviours for other coyotes • If successfully relocated and ill, could facilitate disease spread.

*While relocation is an option employed by other jurisdictions typically as a last resort, it is not appropriate for the Toronto context given the geographical features of the City. Because it is not a viable option, it is not considered by staff during assessment of responses and is only outlined here for informational purposes.”

So relocation more than 1km is usually not allowed, because they might die, despite coyotes having a home range of 13-65km square? Makes absolutely no sense whatsoever.

Relocation should absolutely be considered a last resort option. Ontario can and does grant relocation permits for wildlife, including Urban 23 Coyote in 2021, and most recently, a moose in Rama. Regarding long term sanctuary, both Wildlife Rescue and Rehabilitation in Texas, and Centre Refuge Nymous in Quebec, can take the coyotes in Liberty Village. Other sanctuaries have taken coyotes in the past.

If a coyote must be removed, removal should only mean non lethal removal by Toronto Wildlife Centre or a similar rehabilitation facility like National Wildlife Centre. The animal can be treated at the facility while long term options are being considered.

“Routinely review whether the threshold for escalation to removal-based responses has been met, with consideration for public safety. If a coyote has been confirmed to have bitten or scratched a human and there are no domestic dogs, pups, or dens nearby, staff will initiate assessment to determine whether removal is appropriate. To inform this assessment, and consistent with the Human-Coyote Incident Classification and Response Framework that is being developed for a forthcoming update to the City’s Coyote Response Strategy, staff will determine whether: a. Escalating factors were present b. The attack was provoked c. The problematic coyote can be identified d. If the situation requires considering the removal of more than one coyote in the specific area e. If removal is warranted, what impacts removal methods will have to public safety and park availability, and f. The appropriate type of removal.”

Regarding rabies concerns after a human bite, rabies is not common in coyotes. The modern vaccine is safe to use on a human without lethal testing of the animal. If a human is bitten, there is no need to kill the coyote for rabies dissection tests. The protocol for a provoked human bite should be to leave the coyotes where they are. A serious or unprovoked human bite using a well established bite scale and risk assessment scale could result in live capture of the coyote by a wildlife rehabilitation centre, immediate vaccination of the human, and quarantine of the coyote while long term options are considered.

Live cage traps do work, if set correctly by a wildlife rehabilitation centre. One could work with coyote rescues to develop a coyote sensory friendly live cage trap. Tranquilizer is also an

option these days, since drones and small airtags attached to a dart can be used, technology that wasn't available twelve to twenty two years ago when the response strategy was first developed. Live trapping should never be used for the purpose of killing. Euthanasia by a veterinarian should only be considered if the animal can not live in the wild or long term in a sanctuary due to severe physical and/or mental illness. That is determined by animal care specialists, not some exterminator who makes their living by killing.

Toronto has absolutely no laws regulating pest control companies. Lethal rat control is a huge contributor to this issue. A blanket no exceptions ban on all lethal methods for vertebrate control is desperately needed in the City of Toronto.

Nicole Corrado