

IE20.9 – Toronto’s Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas, Lenka Holubec, ProtectNatureTO

To:

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Dear members of the Infrastructure and Environment Committee and city staff,

On behalf of ProtectNatureTO, I have participated in city’s OLAS related efforts starting in 2019 "*City-Wide Study of Existing Dog Off-Leash Areas. Design, Operations, Maintenance & Best Practices, Stakeholder Workshop*" and more recently "*Citywide Approach to Dogs Off-Leash Areas*" initiated in Sept 23, 2023 by Chris Moise Letter

<https://www.toronto.ca/legdocs/mmis/2023/ie/bgrd/backgroundfile-239111.pdf>

This communication is Requesting Referral of Report E20.9 Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas Back to Staff for the following reasons:

1. More time is needed to evaluate proposed changes along IE20.9 – Toronto’s Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas

The date for the OLA Review Stakeholder Town Hall was scheduled originally for March 4, but then moved to March 18. The presentation slide deck arrived from the city staff on March 28. This does not give enough time for participating public to evaluate the proposed changes, goals, criteria, any potential impacts on environment, wildlife, biodiversity/climate goals, other Strategies (Ravine, Biodiversity, Pollinators), the key planning policies regarding the ESAs -[OPA 262](#) and [OPA 583](#) and other relevant policies. Policies Planning Framework is not included in this Report.

2. The Enforcement was left out. Many People asking for the Special Constables to fill up the gap

Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas indicated from the start that MLS will ensure the approach to this Strategy to address concerns of all park users.

According to what was tabled, MLS was involved in this Review and participating public was expecting that their role will be upgraded from "educate first" approach to active ticketing in relation to what this "Strategy" wants to achieve.

At the March 18th meeting, the participants, both representing dog owners and nature groups were voicing out loud their frustration about lacking enforcement and the horrible consequences for Toronto's natural areas and wildlife but also the general public.

People were asking for Special Constables to fill the gap and to reverse the appalling non-compliance.

To everyone's shock, once the item was tabled, there was no mention of the enforcement and a dire need for the Special Constables or some other form of the real enforcement.

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

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

(4) together with the Executive Director, Municipal Licensing and Standards, to ensure the approach to Dogs Off-Leash Areas includes bylaw enforcement strategies to address the ongoing concerns of all park users;"

"We need to bring harmony to our parks by creating safe, enjoyable spaces for people with and without dogs."

We need much more than slogans. Toronto desperately needs the real enforcement to be initiated and funded prior to this Strategy.

[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."*

So far, there is no evidence that increasing number of OLAS produced more compliance with the on leash laws or other relevant laws (dogs prohibited areas) or benefited urban nature and the general public (non-dog owners). No study supports there are benefits with more OLAS along more compliance, nature protection, general public enjoyment of parks and health.

Calgary, the city with 160 OLAS the most in N/A, employing community involvement since 2013 and the "education first" approach to enforcement, suffers some of the highest non compliance with the leash laws.

Updated: December 20, 2024

[Calgary dog owners disturbing nature by breaking leash rules, letting pooches run free](#)

"Remote cameras captured 50,000 detections of off-leash dogs in on-leash areas. Dog owners in all four Calgary quadrants are regularly breaking the city's off-leash dog rules. Data from a remote-triggered camera project called Calgary Connect shows owners are letting their dogs loose in green spaces home to coyotes, raccoons and other critters.

From 2017 to 2022, the Miistakis Institute tracked animal sightings in Calgary's natural areas through a network of remote-triggered cameras. It snapped photos of off-leash dogs running free in Calgary's natural areas on 50,247 separate occasions. Seventy-two per cent of the pooches caught on camera were off-leash in on-leash areas.

"It matters because it's very disruptive to park users and wildlife," said Tracy Lee, director of conservation at the Miistakis Institute." End of excerpt

Our parks and public spaces deserve the net zero approach to the off leash non-compliance. There would be many more deaths on our roads if speeding offenders were treated via "educate first" approach.

"Educate first approach" resulted in rewarding of non-compliance, normalizing of ignoring of rules and disrespect to laws in general. Nature and wildlife bear the grunt of normalizing of non-compliance. The general public, owners and non-dog owners suffer too as bites and fatalities are on rise.

Updated on January 7, 2025

[Canadian Dog Bite Statistics 2025: Breeds, Incidents, Deaths & FAQ](#)

" It's estimated that there are over 500,000 dog bites annually in Canada.
About 500 Canada Post workers are bitten every year.
Canadians are twice as likely to be bitten by a dog in a city than in the country.
Children ages 5 to 9 years are most commonly bitten by a dog.
Adults are most commonly bitten on the hands and young children on the face and neck.
It's estimated that there are one to two fatalities in Canada from dog attacks yearly.
Of the 28 fatalities between 1990 and 2007, 24 of them were children under 12.
The prairie provinces had the highest incidents of fatal dog attacks."

This Strategy indicated from the start that MLS will ensure the approach to this Strategy to address concerns of all park users. According to what was tabled, MLS was involved in this Review and participating public was expecting that their role is reviewed from "educate first" approach to active ticketing in relation to what this "Strategy" wants to achieve and in general.

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

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

(4) together with the Executive Director, Municipal Licensing and Standards, to ensure the approach to Dogs Off-Leash Areas includes bylaw enforcement strategies to address the ongoing concerns of all park users;"

Summary

Today, we have more people and more dogs living closer together in smaller residences, sharing the same parkland. We need to bring harmony to our parks by creating safe, enjoyable spaces for people with and without dogs.

Toronto has an estimated 300,000 dogs and counting. Toronto's high-rise communities have an estimated 4-8 pets per floor. Adults aged 25-40 now have more dogs than children. Plus, the added number of 'Pandemic Puppies' will bring our already strained infrastructure to a tipping point.

The pandemic has shown how much Torontonians need and value outdoor experiences. Dog owners use parks every day – sometimes multiple times a day – all year long, in all weather. We must plan for the new normal.

<https://secure.toronto.ca/council/agenda-item.do?item=2025.IE20.9>

IE20.9 - Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas

"In response to Council direction (2023.IE6.8, 2023.MM19.3), this report proposes an updated citywide Toronto Dog Off-Leash Strategy ("Strategy") to serve as both a framework and decision-making tool to guide planning, locating, designing, building, maintaining, and upgrading off-leash areas, **as well as promoting responsible dog ownership through education and enforcement and engaging residents including off-leash area users.**

*Toronto is home to more than three million people, and it is estimated that Toronto may be home to **600,000** or more dogs. Currently the City of Toronto's off-leash area network includes 81 off-leash areas, distributed across 21 wards which vary widely in size, design, amenities, and age. An additional 13 off-leash areas are under development and are anticipated for delivery over the next two years, which will bring the total to 94 off-leash areas in 23 wards by 2027.*

<https://www.toronto.ca/legdocs/mmis/2025/ie/bgrd/backgroundfile-254155.pdf>

Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas Date: March 27, 2025
To: Infrastructure and Environment Committee

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(4) together with the Executive Director, Municipal Licensing and Standards, to ensure the approach to Dogs Off-Leash Areas includes bylaw enforcement strategies to address the ongoing concerns of all park users;"

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"In addition, an interdivisional staff team that included representatives from Environment, Climate and Forestry, **Municipal Licensing and Standards**, and six Parks and Recreation branches provided leadership and oversight on this review. Further City Planning, and Solid Waste Management Services were consulted and provided advice."

"Work with **Municipal Licensing and Standards Division** on their public education campaign focused on promoting compliance with dog leash requirements in 2025."

3. ***"More and more municipalities across North America are recognizing off-leash areas as necessary places for people to enjoy legitimate recreation, in the same way that designated spaces are required for other forms of recreation, such as tennis, baseball and so on"***

Premise of this Strategy, as expressed above, originates from the Letter from Councillor Chris Moise on a Citywide Approach to Dogs Off-Leash Areas

But is this premise accurate?

The absence of any notion along "dogs impacts on nature and native wildlife", while defining of OLAS as "legitimate recreation as tennis seems out of touch with science and reality.

OLAS are not the same as *"other forms of recreation, such as tennis, baseball and so on"* and need different criteria and requirements.

There is now a massive body of science indicating dogs impacts on environment including native wildlife, vegetation, trees, transmission of pathogens.

Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas aspires to launch major efforts that come across as "streamlining" (relaxing) of the planning and building requirements to accelerate numbers of OLAS in the city.

2019 *"City-Wide Study of Existing Dog Off-Leash Areas. Design, Operations, Maintenance & Best Practices, Stakeholder*

Workshop" perspective was - ***“the needs of the dogs and dog owners are one of many perspectives the City needs to consider when making decisions about how to manage its increasingly limited park space”***,
“City-Wide Study for Existing City of Toronto Dogs Off-Leash Areas Design, Operations, Maintenance, Administration and Best Practices” <https://www.toronto.ca/legdocs/mmis/2025/ie/bgrd/backgroundfile-254230.pdf>

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 which necessitates that this process is 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)

The official number of dogs in Toronto grew from 300.000 as city officially quoted number in 2024, to 600.000 in 2025. The number of OLAS increased from 70 in 2019 to 76 in 2023 and 81 in 2025. 13 more OLAS is planned by 2027 which would bring the number of OLAS to 94 - an increase of 24 from 2019 (including Covid 19 shutdown) within basically 4 years. This likely makes OLAS the fastest growing facility within in our Parks.

The Report indicates simplified criteria and changes to the current Policy 2010 and approaches.

<https://www.toronto.ca/legdocs/mmis/2025/ie/bgrd/backgroundfile-254155.pdf>

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Goal 1: Plan Proactively

Implement a citywide and proactive approach to planning for new OLA development integrated with the Parks and Recreation Facilities Plan so that new OLAs are built where they can serve the most people and dogs both in areas with and without a nearby OLA”

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](#) proclaims

*“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.**”*

There is now a massive body of science indicating dogs impacts on environment including native wildlife, vegetation, trees, transmission of pathogens.

*“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](#)

This “Strategy” is taking place in time of climate and biodiversity crisis while we do experience in Toronto an extremely high levels of non-compliance.

The following science publication done for Portland municipal government is relevant because it was compiled to help the city of Portland to establish criteria regarding the rules where dogs, OLAs are permissible, while at the same time trying to protect the city’s valuable nature and wildlife. It also served to educate public as to why certain natural areas in Portland are excluded from OLAS and dog walking (pet-free areas).

Impacts of dogs on wildlife and water quality

April 2016, Metro Regional Government, Portland, Oregon

Lori Hennings, Metropolitan Regional Government - a senior natural resource scientist for Metro

Abstract

“Metro periodically reviews the science literature behind its natural resource policies to ensure policies are based on the most current science. Recently staff reviewed the scientific literature regarding the impacts of dogs on wildlife to inform Metro Regulatory Code Title 10.01, which excludes pets from most Metro properties. The only exceptions are service dogs, leashed dogs on some regional trails, Broughton Beach, boat ramps and properties managed by others through intergovernmental agreements that are integrated into larger parks where leashed dogs are allowed (e.g., Forest Park). Any human related activity can disturb wildlife. In order to meet Metro's dual goals of protecting natural resources and providing access to nature, Metro has tried to strategically locate trails in less sensitive habitat and to ensure that human activity is as non-disruptive as possible. Part of that strategy has been to allow public access, while limiting certain activities such as bringing dogs into natural areas. **The evidence that dogs negatively impact wildlife is overwhelming. It is clear that people with dogs – on leash or off – are much more detrimental to wildlife than people without dogs.** Dogs (*Canis lupus familiaris*) are considered to be a subspecies of wolves (*Canis lupus*), and wildlife perceive dogs as predators.” [End of excerpt.]

4. Sustainability of dogs population lens

Dog populations globally are on rise, especially in urban areas which is a cause for concern.

Dogs have complex impacts on environment (are listed as top invasive mammals together with cats), human health and also are significant source of increase of carbon and ecological footprint (a midsize dog has carbon footprint comparable to a smaller SUV, study [Carbon pawprint: is man's best friend the planet's enemy?](#))

Sincerely,

Lenka Holubec, on behalf of [ProtectNatureTO](#)

My recent submissions on dogs related topics in Toronto:

EC18.8 - Developing an Urgent Downtown Coyote Action Plan

<https://secure.toronto.ca/council/agenda-item.do?item=2025.EC18.8>

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

<https://www.toronto.ca/legdocs/mmis/2025/ec/comm/communicationfile-187944.pdf>

<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>

<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>

<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>