



April 7, 2025

To the members of the Infrastructure and Environment Committee,

Submission by Paws for Parks - Item 2025 IE20.9 – Toronto Dog Off-Leash Strategy: Citywide Approach to Dogs Off-Leash Areas

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.

PFP participated in the City’s stakeholder meetings and we were heartened to see dog owners, walkers, community and nature groups working together cooperatively to find a better way forward on the planning and implementation of new OLAs as well as the maintenance and management of existing OLAs.

While the draft Toronto Dog Off-Leash Strategy does an admirable job of improving the planning and design process for new OLAs (ex. the banishment of the dreaded pea gravel), it falls short on Council’s specific direction the General Manager, Parks, Forestry and Recreation and the Executive Director, Municipal Licensing and Standards, **“to ensure the approach to Dogs Off-Leash Areas includes by-law enforcement strategies to address the ongoing concerns of all park users.”** While Goal 6 of the Off-Leash Strategy is “Ensure Responsible Use of OLAs”, no concrete strategy is set out to address the concerns of all park users, and specifically those park users concerned about the number of illegally off-leash dogs in parks where OLAs are present. In addition, the Financial Impact section in the Report for Action does not appear to include the cost of Goal 6 (Ensure Responsible Use of OLAs), which should include improved enforcement efforts.¹ We also have some concerns about locations in or in proximity to Environmentally Significant Areas which are set out more fully in this letter.

¹ Report for Action Toronto’s Dog Off-Leash Strategy, March 27, 2025, pages 3 and 4/14.

For the reasons set out above and more specifically detailed in this letter, Paws for Parks is advocating for a referral back to staff to address the following items:

- 1. A clear by-law enforcement strategy with Key Performance Indicators that are tied to SMART goals (Specific, Measurable, Achievable, Relevant and Time-bound).**
 - 2. An updated Report for Action that factors in the cost of enforcement and the source of these funds.**
 - 3. A science-backed reconsideration of the 10m setback from ESAs, ravines and water and the development of criteria for the relocation of existing OLAs that are within ESAs where City efforts in education, enforcement and/or fencing have not worked to stem environmental degradation and by-law infractions.**
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With respect to PFP's specific comments on the Strategy, we would comment as follows:

1. Environmental Protection

We are glad to see that Environmentally Significant Areas ("ESAs") are now excluded from consideration as OLAs and that environmental protection is specifically noted in Goal 5 of the Strategy (Sustain and Increase Value). This was an item that stakeholders agreed upon. The Strategy does not directly discuss what is to happen to existing OLAs within ESAs. PFP is in support of the relocation of these OLAs within ESAs where off-leash activity is degrading the ESA and/or the City is unable to stem off-leash violations outside of these OLAs. As part of the Strategy, the City should develop criteria for the relocation of OLAs within ESAs where these problems are unable to be solved through enforcement, education and/or improved fencing.

In terms of the specific criteria for the permitted distance between ESAs and OLAs, the Strategy notes a setback of 10 metres from an ESA, water or ravine². Was this number based on any scientific standard re: reduction of environmental impacts? Ten metres is roughly the length of a school bus and strikes us as not far enough away from an ESA to mitigate the impacts of dogs off-leash entering and exiting an OLA. We suggest that staff take another look at this parameter to ensure that it is in line with the City's stated environmental protection goals and backed by science.

2. Financial Impact

Each new OLA is projected to cost taxpayers \$535,000 and \$9.5 million is budgeted in Parks and Recreation 10-year plan to keep OLAs in a good state of repair.³ Missing from the Financial Impact in the Report for Action is the cost of the effective enforcement of by-laws in and around OLAs, a problem that is already evident where there are existing OLAs. The Report for Action should be updated to incorporate costs that will be needed for enforcement in and around existing as well as new OLAs.

² Off-Leash Dog Strategy, page 47/66.

³ Report for Action Toronto's Dog Off-Leash Strategy, March 27, 2025, pages 1/14 and 3/14.

3. Enforcement

Enforcement was a concern for the majority of stakeholders. Seventy-nine percent (79%) of City survey respondents felt that there were a significant number of off-leash dogs outside of off-leash areas⁴ and half of all general park users indicated that they feel either somewhat unsafe or very unsafe visiting parks where OLAs are present⁵. This is not surprising given the City's statistic released in 2023 that showed a 39% jump in dog attacks between 2021 and 2022⁶. The Thinc Design survey summary noted that: "These results make it clear that there are notable concerns for both General Park Users and dog owners who do not use OLAs with regards to feeling safe around and within OLAs".⁷ Toronto Parks should feel welcoming and safe to all of our community members and not create barriers to entry. Resolving these community concerns should be a top priority of the City in moving forward with the OLA Strategy.

Goal 6 of the Strategy (Ensure Responsible Use of OLAs) refers to both education and enforcement but does not explicitly recognize that education has already been ongoing by the City for many years (including an annual summer campaign) with little discernable reduction in the number of illegally off-leash dogs. In addition, for the past three years, PFP has been working with Toronto By-Law and with other City partners at events to educate the public regarding the impacts of off-leash dogs on our communities, parks and wildlife. While we have seen some successes with our Bark Ambassador program, recruiting approximately 100 Bark Ambassadors who agree to a responsible ownership code of conduct, the problem requires more than one community park organization to effectively tackle.

It is clear to us that the repetition of similar print and social media education efforts by the City each year is not money well spent as it is not resulting in a meaningful reduction in off-leash violations. These funds would be better spent on direct enforcement. While PFP continues to believe that Community Based Social Marketing⁸ can work (and we encourage the City to begin using these strategies in their educational outreach), the scale of effort needed to stem what is no longer a small problem cannot be achieved with one small community group alone.

While education in certain contexts can be helpful, many stakeholders (including Paws for Parks) expressed the view in the stakeholder meetings that education that is not coupled with enforcement will not result in a significant reduction of off-leash violations, especially if education simply takes the form of advertisements and signage. The stakeholders did coalesce around one idea that is not explicitly mentioned in the Stakeholder Engagement Results, and that is the need for our By-Law Enforcement Officers ("BEOs") to be given Special Constable status.

This is obliquely referenced in the Stakeholder Engagement materials as follows: "Recognizing the significance of enforcement challenges, stakeholders advocated for *augmenting resources*

⁴ Attachment 2 (Public and Stakeholder Engagement Results), page 29/114.

⁵ Attachment 2 (Public and Stakeholder Engagement Results), page 31/114 and Figure 37.

⁶ [CBC Article Augst 10, 2023](#).

⁷ Attachment 2 (Public and Stakeholder Engagement Results), page 31/114.

⁸ [Doug McKenzie-Mohr, Fostering Sustainable Behavior: An Introduction to Community-Based Social Marketing](#)

and authority for bylaw officers and relevant City personnel.”⁹ ...and... “While stakeholders acknowledged the importance of both education and enforcement in promoting compliance and behaviour change in OLAs, *they expressed a keen interest in bolstering enforcement measures by providing additional resources and authority to bylaw officers* and associated City staff to support initiatives such as active ticketing, conducting licensing compliance checks, and implementing policy reforms related to licensing”¹⁰ (italics mine).

The specific additional authority requested by stakeholders was Special Constable status which would give our BEOs the authority to compel the production of identification (much like TTC fare inspectors). Instead, what is happening currently is citizens are refusing to provide identification or walking away from BEOs when stopped for violations. The elevation of status of course would be beneficial not just for off-leash violations but for all of the by-laws that our BEOs are required to enforce. Even if this is not done across the board for all BEOs, it would be helpful to grant this status to at least a subset of officers who deal with compliance in parks where it is more difficult to obtain compliance. The additional cost of enforcement should be factored into all plans for new OLAs and could also come from increasing the dog licensing rate in the City (noting that the dog licensing rate in the City of Toronto is estimated at only 30%).¹¹

Approaches to Enforcement

Staff looked at other jurisdictions approaches to enforcement and all municipalities consulted identified by-law compliance as a challenge, with varying degrees of success in addressing the issue. Cities noted a lack of resources for enforcement officers and the overall low-priority of dog-related issues making compliance challenging.¹²

Of the 13 municipalities interviewed, 8 indicated by-law enforcement was almost exclusively reactive, only attending OLAs in response to calls. Vancouver, Portland, Denver, Vaughan, and Brampton, on the other hand, noted that in addition to responding to calls about issues at OLAs, enforcement officers also do proactive patrols at dog parks.¹³

Two enforcement approaches of note were found in Portland and Seattle.

Portland’s enforcement generally begins with a warning to non-compliant pet owners, which the city keeps a record of. This is followed by a \$50 USD (about \$72 CAD) ticket for the second violation and a \$150 USD (about \$215 CAD) ticket for the third and subsequent violations. Additionally, Portland’s Park Rangers conduct proactive blitzes in hotspot areas. These areas are identified through a combination of 311 data and frontline staff input. Once an area is identified, the public and relevant stakeholders are informed of the forthcoming blitz one month in advance. Park Rangers then patrol the park and issue tickets without the usual warning for first-time violations. Portland identified success in promoting compliance through their combination of

⁹ Attachment 2 (Public and Stakeholder Engagement Results), page 85/114.

¹⁰ Attachment 2 (Public and Stakeholder Engagement Results), page 89/114.

¹¹ [Global News](#).

¹² Attachment 3 (Jurisdictional Review), page 11/15.

¹³ Attachment 3 (Jurisdictional Review), page 11/15.

proactive and reactive visits to parks.

Seattle's enforcement approach is also note-worthy. The city's People, Dogs & Parks Plan (2017) notes that "it was the hope of city officials that violations of the leash, license and scoop laws would drop with the advent of off-leash areas, but that was not the case". Seattle hired two dedicated staff persons to combat the ongoing compliance issues related to dogs, a Parks Maintenance Worker and a Humane Animal Control Officer, to proactively patrol parks, focusing on hotspot areas. At that time, Seattle had approximately 6,200 acres of parks and 150,000 dogs. Seattle reported that in the first two months on the job in spring 2016, the two officers had exceeded the total number of citations issued in 2014.¹⁴

Toronto has an estimated 610,000 dogs¹⁵ and a similar approach as Seattle (which had only 150,000 dogs at the time of the staff hiring) with dedicated parks officers would be justified. It is important to note that there is evidence that urban Canadian municipalities with very active ticketing and licensing enforcement have a much lower dog bite rate than those municipalities without such ticketing and licensing activity.¹⁶

How do we Measure the Success of Goal 6 (Ensure Responsible Use of OLAs)?

The current Report for Action contains only one Key Performance Indicator ("KPI") for Goal 6 which is the percentage of OLAs with refreshed signage installed¹⁷. While signage within or adjacent to the OLA is needed, signage within the abutting park lands indicating that these areas are on-leash areas and the reasons for keeping dogs leashed in these areas is arguably more important given the feedback from stakeholders regarding park safety. The City has deployed these types of signs in some areas already (see Appendix I).

There is no KPI set with respect to enforcement. In contrast, the Commercial Dog Walker KPI requires tracking of 311 requests and comparison to previous years to establish baseline and monitor sites. We suggest that a more helpful KPI for Goal 6 needs to be set and should include monitoring reports of off-leash violations through 311 data with a goal to have them reduced by a certain percentage each year. This should go hand in hand with collecting ticketing data and ensuring that a certain percentage of tickets are issued as a factor of 311 reports.

Conclusions and Recommendations

Paws for Parks is supportive of the Dogs Off-Leash Strategy and the draft Strategy is an improvement to the status quo, but it does not fully address the Council directive "to ensure the approach to Dogs Off-Leash Areas includes by-law enforcement strategies to address the ongoing concerns of all park users.", in particular with respect to park users' clearly stated concern in the consultation process about off-leash dog infractions and safety in parks with OLAs.

¹⁴ Attachment 3 (Jurisdictional Review), page 12/15.

¹⁵ [Toronto Life](#)

¹⁶ [City of Toronto Responsible Dog Ownership Staff Report](#)

¹⁷ Report for Action, page 13/14.

For that reason, Paws for Parks is advocating for a referral back to staff to address the following items:

1. A clear by-law enforcement strategy with Key Performance Indicators that are tied to SMART goals (Specific, Measurable, Achievable, Relevant and Time-bound).
2. An updated Report for Action that factors in the cost of enforcement and the source of these funds.
3. A science-backed reconsideration of the 10m setback from ESAs, ravines and water and the development of criteria for the relocation of existing OLAs that are within ESAs where City efforts in education, enforcement and/or fencing have not worked to stem environmental degradation and by-law infractions.

Regards,

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APPENDIX I – ON-LEASH CITY OF TORONTO SIGNAGE

