



April 8, 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

Turtle Protectors (TP) is an Indigenous-led stewardship program that advocates, supports and protects Turtles living in Toronto parks. We do this work because all eight turtles native to Ontario are “At Risk” federally. We share Indigenous ways of being in reciprocal relationship with all of our relations and practice the concept of Etuaptmunk, also known as two-eyed seeing. We are focused on reconciling human impacts on turtles by protecting their nests, helping turtles cross roads and helping hatchlings get closer to water so they don’t get crushed by feet, cars or bikes.

Since we formally launched in 2022, we have expanded into 7 parks (High Park, Colonel Sam Smith, Don Valley Brick Works, Etienne Brule, Smythe, King's Mill and Rennie Park). In 2024 we launched two major annual campaigns to raise awareness about turtles; Hatchling Hill during the Cherry Blossom Festival in High Park and Turtles on the Move Parade. In 2024, over 100 volunteers donated over 2000 hours of their time. Together we helped 878 hatchlings move closer to water, sat with 124 Mama Turtles and protected over 70 nests. Our vision is to be in every Toronto Park near water but we will only expand at a rate that continues to allow us to be Indigenous-led.



TP participated in the OLA Virtual Town Hall on March 18, 2025 because dogs off leash in on leash areas have an impact on the turtles we are trying to protect and the wetlands they call home. While we monitor parks for nesting turtles and hatchlings we find ourselves having to ask so many dog owners to put their dogs on leash. This is a photo of an off-leash dog in an on-leash area pawing at a nesting Snapping Turtle in High Park's imperilled Black Oak Savannah. (2023)

We collaborate with Paws For Parks on wildlife concerns in High Park and as such they shared their recommendations with us. Their recommendations align with our values, mission and goals. We encourage you to adopt their recommendations found below. All three are critical to turtles, wildlife and plant relatives that call parks home. For us moving the existing OLA from High Park is particularly important given that it is home to an adult Blanding's Turtle who is designated a Threatened Species in Ontario and Endangered in Canada. (please do not post the information about Blanding's publicly as they are still poached from the wild for the pet trade)

We support the following PAWS for Parks recommendations:

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.

Miigwetch, thank you,

Carolynne Crawley and Jenny Davis
co-founders Turtle Protectors