

**IE20.9 – Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas, Lenka Holubec, ProtectNatureTO, ADDENDUM Apr8 2025**

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.

**This Addendum is not having any effect on my request that Report E20.9 Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas be Referred Back to Staff.**

ADDENDUM is addressing SETBACKS in relation to the ESA/ANSIs for the sake of clarity.

**TORONTO'S DOG OFF-LEASH STRATEGY: A Citywide Approach to Dogs Off-Leash Areas**

<https://www.toronto.ca/legdocs/mmis/2025/ie/bgrd/backgroundfile-254202.pdf>

Appendix B:

Location Criteria and Design

Guidance for Toronto Dogs Off- Leash Areas

Setbacks, pg.10

Recommended Set backs

[Toronto's Dog Off-Leash Strategy A Citywide Approach to Dogs Off-Leash Areas SETBACKS backgroundfile-254202.pdf](#)

**It seems that Appendix B is treating the ESA/ANSIs, in terms of setbacks and the level of protection afforded, the same as ravines which is not correct.**

Ravines are protected by Municipal Code Chapter 658, Ravine and Natural Features Protection and the City OP where relevant.

The ESA/ANSIs are afforded much higher level of protection, based on the Provincial Policy Statement 2014 (now Provincial Planning Act 2024) policies adopted into city OP in 2015.

When updating the 2010 Off-leash policy, all changes that arrived with [OPA 262](#) and [OPA 583](#) need to be adopted into new policy.

[Provincial Policy Statement PPS 2014 Policy E7 the ESAs](#)

In 2014, the Province asked municipalities to identify natural heritage in E6 and E7 (Toronto) Ecoregions. This was in Toronto done earlier 2009 -2012 - the ESAs were studied and mapped. In 2015 this process was finalized – see [OPA 262](#)

The ESA/ANSIs are guided by the special set of rules adopted into City OP in 2015. It was approved by the Province in May 2016. The OPA is in full force and effect.

**Official Plan Five Year Review: Final Recommendation Report - Amendments to the Official Plan Environmental Policies and Designation of Environmentally Significant Areas**

<https://www.toronto.ca/legdocs/mmis/2015/pg/bgrd/backgroundfile-84224.pdf>

**“City Council's planning decisions are required to be consistent with the PPS”** (now Planning Policy Statement 2024).

**OLA is a planning decision and it constitutes “*site alteration*” if proposed in adjacency of the ESA/ANSIs. It may need Impact Study.**

**PPS official guide is Natural Heritage Reference Manual, 2010, best practices.** This guide deals with issues related to avoiding/mitigating impacts of development.

Chapter related to **“Adjacent Lands”** includes table of setbacks:

[NHRM adjacent lands](#) setbacks

In general setback for most of the ESAs should be 120m from proposed OLA.

Significant wetlands and significant coastal wetlands 120 m

Significant woodlands 120 m,

Significant habitat of endangered and threatened species 120 m

Significant valleylands 120 m

Significant areas of natural and scientific interest – life science 120 m

<https://www.ontario.ca/files/2024-10/mmah-provincial-planning-statement-en-2024-10-23.pdf>

## PROVINCIAL PLANNING STATEMENT, 2024

Under the Planning Act

“8. Development and **site alteration shall not be permitted on adjacent lands to the natural heritage features and areas** identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions. pg. 21

Negative impacts: means pg.48

...

a) in regard to policy 3.6.4 and 3.6.5, potential risks to human health and safety and degradation to the quality and quantity of water, sensitive surface water features and sensitive ground water features, and their related hydrologic functions, due to single, multiple or successive development. Negative impacts should be assessed through environmental studies including hydrogeological or water quality impact assessments, in accordance with provincial standards;

b) in regard to fish habitat, any harmful alteration, disruption or destruction of fish habitat, except where an exemption to the prohibition has been authorized under the

c) in regard to other natural heritage features and areas, degradation that threatens the health and integrity of the natural features or ecological functions for which an area is identified due to single, multiple or successive development or site alteration activities.

d) in regard to policy 4.2, degradation to the quality and quantity of water, sensitive surface water features and sensitive ground water features, and their related hydrologic functions, due to single, multiple or successive development or site alteration activities;

and

e) in regard to policy 3.3.3, any development or site alteration that would compromise or conflict with the planned or existing function, capacity to accommodate future needs, and cost of implementation of the corridor.

Sincerely,

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

## References:

\* [Nordheimer Ravine Proposed DOLA Comments Dec 4, 2019 Lenka Holubec PNTQ](#)

## Excerpt:

**“Toronto’s natural areas and wildlife habitats are under significant stressors related to rapid intensification and increasing number of pets, while at the time size of the parkland is finite and biodiversity declining.**

Protecting remaining natural heritage system to retain it’s the ecological function and enhance biodiversity is crucial for the city’s continued sustainability.

Establishing of DOLA in the proposed location (Nordheimer Ravine, the ESA) would, in my opinion, conflict or not to conform to several of the policies instituted to protect natural heritage system in the city for the long term.

[Toronto Municipal Code Chapter 608 Parks dogs prohibited areas](#)

A. While in a park, no person as owner or person having control of a dog shall: [Amended 2007-07-19

by By-law 790-2007;30 2009-10-27 by By-law 1093-200931]

(2) Excluding person with a disability accompanied by a service animal, and a working dog providing a service to the City, **allow the dog to enter a prohibited area; [Amended 2016-11-09 by By-law 1073-201632]**

**PROHIBITED AREAS: [Added 2007-07-19 by By-law 790-200713]**

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).

**Establishing of new DOLA in the proposed location constitutes site alternation in the natural area adjacent to ESA**

**Dog walking is not a minor recreation activity and establishing of DOLA has a major impact on the natural area and entire adjacent area.**

**Dogs have complex negative impacts on natural areas, wildlife and water as research shows [Impacts of dogs on wildlife and water quality](#) .**

## Conclusion:

With increasing intensification of the city and escalating user pressures on the parks and designated natural areas (ESA/ANSI. designated ravines), it is crucial to implement as a minimum requirement existing policies guiding natural heritage in relation to the land use decisions.

In this respect any decision on establishing of new DOLA’s, reviewing of existing DOLA’s, on public access, regarding non-compatible recreation activities, etc. has a potential to support or undermine the city natural heritage and biodiversity.

Recent efforts such as Toronto Ravine Strategy and Biodiversity Strategy stress PROTECT as prime principal together with Ecological Integrity, restoring and enhancing of remaining natural heritage system.

Establishing of DOLA’s in or adjacent to ESA/ANSI and the Ravines regulated by Ravine and Natural Feature Protection By-Law - Municipal Code Chapter 658, is in conflict and not consistent with the provincial and municipal policies guiding protection of natural heritage. Dog walking is not a minor recreation activity as dogs off leash and even on leash have complex negative impacts on natural areas, wildlife, water quality and biodiversity as research overwhelmingly shows.

End of excerpt

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>

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<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>