Date: April 8, 2025

To: Infrastructure and Environment Committee <iec@toronto.ca>

Re: IE20.9 - Toronto's Dog Off-Leash Strategy: A Citywide Approach to Dogs Off-Leash Areas, April 9, 2025

I am writing to urge your committee to refer this item back to staff to address serious shortcomings in the proposed strategy.

Despite many discussions and submissions during the consultation stage, this proposed strategy fails to adequately address the need for "on-leash" compliance outside of off-leash areas. Improved on-leash compliance is not included as one of the "goals". There is no mention of adequately resourcing by-law officers, e.g. by upgrading them to constable status (e.g. able to require that people show their ID). There is also no mention of an organized volunteer ambassador program to help promote compliance with relevant rules, both inside and outside off-leash areas. Instead, Goal 6 includes this generalized statement with no Goals or Key Performance Indicators to support it: "Continue to promote responsible dog ownership through public education and support enforcement efforts."

It seems obvious that the fundamental reason for assigning valuable parkland to the specific use of "Off-Leash Area" is to support on-leash compliance in all other public places. Addressing only one side of this relationship undermines the very purpose of having Off-Leash Areas. The fact that OLAs are a Parks facility while enforcement falls under a different branch of city government, Municipal Licensing and Standards, is not a good enough reason to address only the OLA side of the relationship.

Toronto has neglected the non-compliance issue for far too many years and the problem keeps getting worse. Now is the time to set meaningful goals and take effective steps to meet those goals. More of "business as usual" will not do. Enforcement needs to be meaningful and effective, and it needs to be adequately funded and accountable for results.

Therefore, I urge you to seize this opportunity to refer this item back for more complete and balanced treatment of a combined on-leash/off-leash strategy and related allocation of City resources.

In addition, given the broad recognition that OLAs do not belong in or directly adjacent to Environmentally Sensitive Areas, I urge you to call for a review of all such facilities that currently exist on a grandfathered basis. For example, a casual visit to High Park makes it readily apparent that having a large OLA in the midst of an Environmentally Sensitive Area has not fostered on-leash compliance in the rest of the park; rather it has encouraged the idea that all of High Park is a "dog park". The time to correct this unacceptable and damaging situation is long overdue.

Thank you.

Karen Yukich