

High Park Natural Environment Committee

Item 2025.IE 20.9

Supplemental Report: Enforcement Approach for Off-Leash Areas and Parks

I am writing in response to the Supplementary report from the Executive Director, Municipal Licensing and Standards on Enforcement Approach for Off-Leash Areas and Parks (IE20.9a) of April 22, 2025.

Extracts from the Report

The supplementary report states that "Staff in MLS' Bylaw Enforcement Team enforce all rules outlined in the Parks By-law," then lists four examples:

Toronto Municipal Code Chapter 608, Parks (Parks By-law) requires that:

- Dogs be on a leash at all times while in a park or a beach, except in designated areas, and dog owners must immediately pick up dog waste
- Dog owners only permit their dogs to be off leash in designated OLAs and abide by posted conditions of use of the OLA (including hours of use and/or prohibition on commercial dog walkers)
- The following are not allowed in OLAs:
 - o Female dogs in heat
 - o Any dog that has been issued a Dangerous Dog Order by the City or is required to be muzzled or secured by a leash under the Dog Owner's Liability Act
- Commercial Dog Walkers must be authorized by permit by the Parks and Recreation Division and are allowed to walk and have control of 4 to 6 dogs at a time and shall not enter a designated off-leash area that prohibits Commercial Dog Walkers

Background

Conspicuously missing from this list is By-law 608-34-2-(A):
608-34. Dogs.

A. While in a park, no person as owner or person having control of a dog shall: ...

(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;

where a prohibited area is defined in 608-1

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).

This bylaw is not capricious or frivolous. It was passed in 2007 shortly after the City amended its Official Plan in 2006 to, among other things, protect natural heritage in accordance with provincial direction. The by-law implements, in part, Official Plan Policy 3.4.14, which limits activities in protected areas to those that are compatible with

the preservation of the natural features and ecological functions attributed to the areas. It's one of the few by-laws that addresses activities.

Many protected natural areas are home to animals sensitive to disturbance (classified as area-sensitive species), an important ecological function. If the protected area is known to provide this function, it is noted in the reports establishing the area. Areas of natural or scientific interest are so designated because their natural heritage features and functions are of the highest quality (half of High Park is designated a provincially significant Area of Natural and Scientific Interest-Life Sciences) and should receive the greatest protection.

Dogs, even on leash and on trail as too many are not, are perceived as predators. There is a very large number of dogs in Toronto, including in protected natural areas, and their presence drives out the animals on whose behalf the area was designated. Areas that provide this habitat are rare not only in Toronto but often in the province.

Recommendation

The provision of more OLAs is unlikely to reduce the number of dogs in protected areas, or even the number of dogs off-leash in protected areas. Education and enforcement of By-law 608-34-2-(A) would go a long way to improving the protection of Toronto's designated natural heritage so that everyone, not just dogs, can enjoy them for the long term.

Leslie Gooding
Co-Chair, High Park Natural Environment Committee

The High Park Natural Environment Committee provides education about High Park's natural environment, primarily through its website <https://highparknature.org/> and advocates for its protection.