ROCKLAND NEIGHBOURHOOD ASSOCIATION
P.O. Box 5276, Station B, Victoria BC, V8R 6N4

Land Use

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"Victoria 2050" | Urban Tree Canopy | Gap Analysis
March 13, 2025

Dear Mayor and Council

Overview: Urban tree canopy data has been collected over multiple years by City of Victoria to facilitate ongoing monitoring of its urban forest canopy. The City outsourced urban tree canopy (vegetation) change detection analysis twice before. The method used in 2007-2013 and 2013-2019 should be repeated with the most recently obtained urban tree canopy measurements (2023). This analysis will provide better understanding of how the urban forest has been impacted by development policies and practices over the last five years. The results of that analysis will clarify how present land use development policies and the Tree Protection Bylaw interrelate. This analysis is integral to understanding proposed changes to the Official Community Plan (OCP) and their potential impacts on the urban forest over the medium to long term.

Action items: Request that the Urban Forestry staff perform the following measurements and incorporate into the Draft OCP "Victoria 2025."

1. a) 2021-2025 neighbourhood-level metrics on quantity of trees retained and quantity of trees removed through developments, b) 2021-2025 neighbourhood-level metrics on quantity of development sites that met Tree Protection Bylaw tree minimums compared to developments that did not meet the Tree Protection Bylaw tree minimums. (Attachment F – Approach to Site Servicing Renewal – Urban Forest)

2. Obtain vegetation (urban tree canopy) change detection analysis for 2019-2023 using the methods from previous surveys by Terra Remote Sensing (2007-2013, 2013-2019) (Attachment A: Natural Assets 4.3 Urban Forest, city-wide canopy cover quoted at 28 per cent).

3. Define the percentage of plantable space for residential zoning parameters relative to findings of Actions 1 and 2 (Attachment C – Approach to Zoning Modernization – Other Key Residential Zoning Parameters).

Backgrounder:

The Rockland Neighbourhood Association LUC requests Urban Forestry Planning staff (or a third party urban forestry consultant) to conduct analysis of data obtained in Action Items 1, 2 and 3, and incorporate into Draft OCP "Victoria 2025" on anticipated medium and long term urban forest impacts. The City of Victoria measured its urban forest and conducted vegetation assessments using LiDAR technology in 2007, 2013, 2019, and 2023, focusing on neighborhood and citywide levels, it also included plantable space.

From 2013 to 2019, Victoria's urban forest grew by 2.37%, achieving a citywide canopy cover of 28.8%. The growth aligned with urban forestry management practices and the Official Community Plan (OCP), predating the updated Tree Protection Bylaw (21-035). The Tree Protection Bylaw has not been updated since the introduction of City of Victoria's Missing Middle Housing Initiative and Province of BC Bills 44 and 37 and is considered outdated in relation to lot densification. This is significant, because housing policies which prioritize building structures and utilities, can conflict with Bylaw protections for trees and limit tree planting efforts. Additionally, the Tree Reserve Fund, accumulating over $1.8 million from 2021 to 2024, raises questions about the City's valuation of trees and its ability to address tree minimum deficits.

No further vegetation change detection has been conducted since the 2019 assessment, and Mayor and Council has not asked how the land development and urban forest management guidelines, bylaws, and policies are linked.

The Tree Protection Bylaw establishes a minimum tree density for new developments based on 50 trees per hectare and is predicated on a projected canopy coverage over time but lacks empirical evidence supporting its effectiveness.

The Bylaw also suggests a feasible 15% canopy cover within 30 years, primarily applying to private properties, yet a city or neighborhood canopy target has not been set.

The release of 2023 LiDAR data offers a chance to update urban forest measurements and analyze changes from 2019 to 2023 to build City of Victoria's understanding of links between existing urban forest policies and land use changes over the past five years. Measurements inform Bylaw modernization, help navigate constraints, and will further the goals set forth in the "Victoria 2050" vision and the Urban Forest Master Plan.

Neighborhood-level canopy deficiencies negatively impact residents' physical and mental health, and wildlife habitats which emphasizes the need for a review of the Bylaw's effectiveness. Further data should be considered to understand the effectiveness of the existing Bylaw, beginning with an urban forestry inquiry analyzing the number of completed development projects between 2021-2025 that have met the Bylaw tree minimum requirements.

The City's Urban Forest Management Plan (2013) is also well out of date. Establishing neighbourhood level and citywide urban tree canopy targets at both neighborhood and citywide levels would enable City staff to prioritize areas for enhancement on private and public lands, and measure their progress toward achieving targeted outcomes.

Sincerely,

Carollyne Yardley and Phil Calvert
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