



**GARRY OAK MEADOW
PRESERVATION SOCIETY**

December 15, 2025

Dear Saanich Staff,

Thank you for the opportunity to comment on Saanich's Tree Protection Bylaw. Please find below feedback from the Garry Oak Meadow Preservation Society.

1) Increase unauthorized tree removal penalties to a level that reflects the true costs to the community and local government from the loss of mature trees.

- This is important to Saanich's commitments to climate mitigation and adaptation, as well as community health and safety.
- In City of Richmond, the penalties are up to \$50,000 per tree. City of Toronto and Ottawa have established penalties up to \$100,000 per tree.

2) Ensure that proposed lot level canopy density targets, tree replacement size categories, and minimum soil volume expectations are compatible relative to OCP allowable lot floorspace ratios.

- Considerable staff review time and bottlenecks in the permitting process are generated when density targets, size requirements, and soil volume minimums are incompatible with OCP established FSRs.
- Collection of cash-in-lieu for developments with FSRs that cannot meet Bylaw tree minimums generate administrative challenges, and additional workload is created for operations staff to plant on public lands to offset canopy loss on private lands.
- Saanich staff have already indicated they are running out of easily plantable sites on public lands (State of the Urban Forest, 2024)

3) Incentivize retention of existing trees in good condition with a higher credit toward the post-development minimum.

- This may have greater effect in persuading voluntary design change to accommodate existing mature trees, and discourage the removal of mature trees.

4) Increase cash-in-lieu fees to discourage canopy deficiencies on a developed lot at the design stage.

- Set cash-in-lieu fees sufficient to fully offset the cost of replacement on public property. This should include all costs for planning the new planting site, materials, installation, and establishment care for 5 years post-planting.

5) Improve transparency on Tree Protection Bylaw outcomes in supporting progress toward Urban Forest Strategy (2024) canopy targets.

- Measure and report to the public annually (Saanich Parks Urban Forest website) the effectiveness of development lot canopy minimum outcomes by primary growth area.
- Annually identify what percentage of developments met canopy targets, what percentage did not meet canopy targets, and the collective deficiency measured in quantity of trees or cash-in-lieu funds generated.



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6) Provide clarity for everyone interacting with the Tree Protection Bylaw on tree-related protection covered by other Bylaws to improve awareness and compliance.

- References to other Bylaws and specifications on scope are included in the Tree Protection Bylaw and also clearly referenced on the Parks website.
- This can have an effect in reducing the repeated staff clarifying correspondence, and reduce the requirement for enforcement functions.
- Examples include protections for City trees, the Subdivision Bylaw, Development Permit Areas, etc.

7) Reduce the size requirements for local species replacement trees, for example, Garry oak, contextual to appropriate planting situations.

- Smaller nursery stock can reduce transplant stress related tree mortality and improve establishment rates in certain situations.
- Smaller nursery stock is more readily available for local species like Garry oak.

9) Establish in the Tree Protection Bylaw that replacement trees are inspected and inventoried, and make the replacement tree inventory public in Saanich Maps.

- This will improve resources for homeowners, project arborists, landscape architects, developers, and the general public to ensure trees planted as part of developments establish and grow to maturity.
- Maintaining this resource publicly can reduce accidental removals (based on undersized status) and improve establishment success.
- Include species of replacement tree and size at last inspection.

Thank you,

Garry Oak Meadow Preservation Society
www.garryoak.info