



Garry Oak Meadow Preservation Society

Dedicated to Protecting Victoria's Living Artifact

September 11, 2025
Advocacy Contributions

Title: GOMPS Contribution to Rockland Neighbourhood Association OCP Submission

Published by:
Rockland Neighbourhood Association (RNA)

Process:
City of Victoria – Official Community Plan Update

GOMPS Role:
GOMPS contributed ecological analysis, Garry oak ecosystem mapping context, and policy recommendations related to urban forest protection and minimum plantable space.

Context:
This submission formed part of RNA's formal response to the City of Victoria's OCP update and was presented to Council on September 11, 2025.

Original Publication:

Rockland Neighbourhood Association OCP Submission

- <https://pub-victoria.escribemeetings.com/Meeting.aspx?Id=72025c5f-79f4-4abb-8767-77d1996f4eef&Agenda=Merged&lang=English>

https://rockland.bc.ca/wp/wp-content/uploads/2025/10/Public_Hearing_OCP_Sept11_RNA_LUC.pdf

Contribution:

URBAN FOREST: CITY-WIDE

Vancouver Island is located within the Coastal Douglas-fir biogeoclimatic zone. Human pressure from development, agriculture and logging make it the most at-risk biogeoclimatic zone in BC.

The Kwetlal food system, colonially known as the Garry oak ecosystem, is a subcomponent of this zone and emerged after the glacial retreat around 10,000 years ago. According to the Canadian Forestry Service, the ecosystem is mostly contained to the Metro Victoria area in Canada.

The open woodland character resulted from millennia of Lekwungen agroecological management and is considered to be a living artifact by the Lekwungen-speaking people. In the absence of these activities, the landscape would be dominated by closed stands of Douglas-fir and Grand fir.

While relatively intact Garry oak ecosystems can be found in Regional Parks, 75% of Garry oak trees and modified ecosystems are located on what the municipality refers to as private land.

The Garry oak tree, a long-lived keystone species, supports over 1,645 co-evolved species of plants, insects, mammals, amphibians, birds, and reptiles (that differ from wildland species), making its preservation crucial. Garry oak and associated ecosystems in this region have a unique local genetic adaption that would be difficult to re-introduce if lost.

Trees exist on private properties in Victoria that exceed 250 years old—the marker which meets the definition of old growth for coastal forests by the Province of BC—and many of those old trees continue to thrive, vibrating with the rich cultural history of the Lekwungen territory.

Naturally adapted to this region's severe droughts and heat, native Garry oak trees serve as vital nature-based solutions to counteract flood risks and the urban heat island effect, particularly affecting vulnerable populations.

Plant ecologist and Indigenous scholar Robin Wall Kimmerer, in her book *Braiding Sweetgrass: Indigenous Wisdom, Scientific Knowledge, and the Teachings of Plants*, advocates for weaving together Indigenous wisdom and scientific knowledge to help mend the relationship between humans and the natural world.

The City's OCP Vision 2050 Reconciliation Actions, *Understanding Indigenous Land and Water Management*, states that the City will “seek to understand the practices that have supported ecosystem conservation for millennia and work collaboratively to braid Indigenous knowledge systems with Western science in preserving and enhancing natural assets, and in advancing a climate-forward city.”

The City of Victoria Draft OCP City bylaws, legislation, and process undermine this objective.

Key Issues

- The OCP's new land use class scheme was determined without a City-wide biodiversity assessment on private land, presenting an obstacle to stewardship opportunities.

- Development Permit Areas for all new housing include requirements for protecting the natural environment, its ecosystem, and biological diversity; however, the General Urban Design guidelines for the urban forest were crafted in the absence of an Indigenous land manager, licensed ecologists, biologists, or urban foresters.
 - Tree Protection Bylaw (21-035) has not been updated since provincial housing legislation directives (2022) and cannot provide physical protection for existing trees located within a proposed building envelope.
 - We are encouraged that the canopy has grown by 100 soccer fields over 10 years while adding more than 8,000 net new homes (almost entirely multifamily buildings). However, the rate of growth dropped by 50% in the last four years, meaning 23 hectares short of the previous four years' urban tree canopy growth rate.
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Proposed Urban Forest Policy Recommendations

- Adopt a City-wide Garry oak species detection tool as part of ongoing urban forest remote sensing updates.
- Create an Urban Forest Technical Advisory group as recommended by the City of Victoria's Urban Forest Master Plan (2012), with representation from Indigenous knowledge systems, environmental organizations, ecologists, biologists, and urban forestry experts to analyze government and third-party data (such as urban forest remote sensing) and report their recommendations to Parks + Urban Forestry.
- The OCP reduced Landscape Area (Plantable space) minimums from 9% to 6% on every development lot. Plantable space is a leading indicator of canopy coverage.
- Therefore, increase the Landscape Area (Plantable space) minimums in Priority Growth and Residential Infill Zoning Areas from 6% to 9%.
- A 6 m backyard setback (for example) provides limited opportunity to retain existing large trees, and the "Minimum Required Trees Per Lot" is excessively difficult to achieve when applying spacing requirements in the Tree Protection Bylaw.
- Therefore, increase all setbacks by a minimum of 2 m for Landscape Area (Plantable space) (i.e., soil area for planting a large species of tree as opposed to a medium-sized tree) in the Priority Growth and Residential Infill Zoning Areas.
- Update Section (4) Applied Guidelines (Pages 189, 193, etc.) from "INTACT Garry oak ecosystems" to "and modified Garry oak ecosystems and Garry oak trees."