A1

TOWN OF COMOX

STRATEGIC PLANNING COMMITTEE MEETING

AGENDA FOR WEDNESDAY MAY 13, 2026

We respectfully acknowledge that the land on which we gather and work is on the Unceded Traditional Territory of the K'ómoks First Nation, the traditional keepers of this land.

Meeting Location: Council Chambers, 1801B Beaufort Avenue, Comox

Call to Order: Immediately following the Special Council Meeting beginning at 5:00 p.m.

Adoption of the Agenda

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1. STRATEGIC PRIORITIESD REPORT:

(2) a. Strategic Planning Scorecard

2. DELEGATIONS:

a. Scott Mercer, Detachment Commander (Royal Canadian Mounted Police): Policing priorities discussion

3. DISCUSSION ITEMS:

(7) a. Fourth Quarter Financial Update

THAT the May 13, 2026 report from the Director of Finance, titled Fourth Quarter Financial Update be received for information.

(13) b. Tree Protection Bylaw

Appendix A - May 6, 2026 Report
Appendix B - May 6, 2026 Presentation Slides
Appendix C - March 11, 2026 Workshop Presentation Slides

ADJOURNMENT

CORPORATE OFFICER

TOWN OF COMOX

Council Strategic Priorities Dashboard

ORGANIZATIONAL EXCELLENCE

AREA OF FOCUS	PROJECTS AND INITIATIVES	TASKS	YEAR	*	STATUS
Asset Management	Develop and implement an asset funding strategy to close the infrastructure deficit		2023		Council approved closing the financial infrastructure gap over a 10 year period. Asset reserve policies to be developed. Next update to valuations will be compelted for new Council term in 2027. New asset management software purchased and proceeding to updating asset information to support asset management plan update.
	Continue to consider electrification of the Town's fleet and equipment where practical and appropriate				Added hybrid parks pickup truck in 2023, completing electrical assessment of Public Works charging capacity in 2025. New Ladder truck purhcase includes all battery equipment and tools. Additional electric vehicle charging station added to parks building.
	Future proof infrastructure to prepare for climate change and events				In progress. Discussions with electrical contractor on generator installation for the Community Centre.
Staff Retention	Develop Standards of Conduct Policy to promote a positive workplace	Develop Policy	2023		Completed and adopted spring of 2025
		Develop/Update accompanying policies - Respectful Workplace, Purchasing, Use of Technology	2023		Respectful work place, IT, and use of technology policies completed and adopted by Council.
		Council adoption of policies	2024		Complete
	Pursue structural alignment through organizational Strategic Plan updates		2022-26		In progress
	Bylaw Enforcement Officer Safety	Safety inventory and assessment	2024		Complete
		Personal protective equipment	2024		Complete
Internal Processes	***TOP PROJECT: Streamline development application process****	Implement e-permitting for development applications	2024		Complete
		Implement outcomes of development application review process	2024		Complete
	Cross-train casual employees in different departments	Community Centre casual trained in Corporate	2023		Complete.
		Corporate casual trained in Finance	2023		Complete
	Digitize requests for information - looking at using online forms for submission of certain requests.	Banner Station - online application	2023		Complete
		Bylaw Complaint - online application	2024		Complete
		Business Licence - online application	2024		Complete
	Complete Climate Change Risk Assessment and Action Plan	Deliver Climate Change Risk Assessment and Action Plan	2024		Complete
	Council Policy Development and Renewals	Council Conference and Travel Policy	2024		Approved at Feb 21 RCM
		Video Surveillance Policy	2024		Not started
	Accessibility Requirements	Establish Accessibility Committee	2024		Comox Valley Accessibility Committee established as a regional committee for all Comox Valley local governments. Council adopted Accessibility Plan in spring 2025.
		Complete accessibility audit of Town facilities, services and communications	2024		Complete
		Develop an Accessibility Plan	2025		Plan adopted Feb 2025
		Complete accessibility SparcBC grant projects (website map layer, accessibility button, photo gallery)	2025		Final report sent to SparcBC Nov 18, 2025 to initiate final payment to the Town.
	Legal Agreement Development and Renewals	Marine Service Building Leases	2025		Complete
		Marina Food Vendor Lease Renewals	2024		Complete
		Solid Waste Commercial Contract Renewal	2024		Complete
		Facility Use Agreement Renewals	2025		Complete
	Bylaw Development and Renewals	New Solid Waste Management Bylaw	2023		Complete
		Updated Fees and Charges Bylaw	2024		Complete
		Adopt new Business Improvement Area Byalw	2025		Complete
	Filing System Review and Archive	Administration files review and archive	2024		In progress
Customer Service	Move toward macro-focussed customer service model		2024		In progress. Example requirement to shovel sidewalks, requirement to mow boulevards, decreased support for development application construction.
	Develop an organizational growth plan		2024		Council approved 50% non-market growth in 2024 budget towards additional Parks seasonal. Council approved growth in Community Center revenue towards additional part time clerk and increased Ask-a-Trainer hours

* *Status Colours:* Completed: On Hold: In Progress:

** *Strategic initiative reworded*

	AREA OF FOCUS	PROJECTS AND INITIATIVES	TASKS	YEAR	*	STATUS
COMMUNITY CONNECTION AND WELLNESS	Recreation	Focus on providing equitable access to community recreation through the LEAP and TRIP programs.	Provide Council Report: make permanent LEAP Adults	2024		Council approved LEAP adults at RCM June 5, 2024.
		Deliver youth recreation opportunities and continue to support the Comox Youth Council.		2024		CYC attended March 12th 2025. Mayor Minoins to serve as liason.
		Youth Recreation	Hire Programmer	2024		Complete
		TOP PROJECT: Further enhance youth recreation opportunities through the construction of a pump track and development of skate park plans.	Determine location for pump track	2023		Council provided direction to seek grant support for pump track. Site considerations will be included in Parks and Trails Master Plan process. The Modular Pump Track report was presented to Council in October 2025. Staff reported back in December and are waiting for direction on the modular pump track.
			Seek and submit grant funding proposals	2024		Contractor hired to assist with search for grants.
		Update Recreation Marketing Plan	Add Council Strategic Plan vision, lenses and values to plan and create schedule of monthly communication tactics.	2025		Summer Camp branding and 2025 marketing and communication plan complete.
		Build schedule of Community Centre capital replacement	Source quotes for replacement Gym floor and wall	2024		Quotes received and consideration for replacement timing taking place. Water issue in floor believed to be resolved.
		Sport Field Strategy	Work with Courtenay and the CVRD to implement recommendations from the 2023 Comox Valley Sport Fields Strategy report	2024-25		Report provided to Council February 2025. Work beginning on regional sports field allocation and fee policy (see 'Good Governance' - relationships)
		Recreation Master Plan		2025-26		
	Parks	Complete Brooklyn Creek greenway south of Noel Avenue.				In progress
		Acquire further parks and nature space within town boundaries.				In progress
		Complete an ocean front walkway connection west of Marina Park to Ellis Street.				Complete, Council directed to not move forward with this project
		Explore acquiring a bee friendly designation				Completed. The Town is officially a bee friendly community.
		TOP PROJECT: Develop an Urban Forest Management Strategy to catalogue current needs and map future growth of the Town's parks systems.				Complete - final draft presented to Council RCM March 11, 2026
		TOP PROJECT: Develop a Parks Master Plan to catalogue current needs and map future growth of the Town's parks systems.		2024-25		Completed. Select projects added to the Strategic Plan.
	Arts and Culture	Continue to support Nautical Days and Filberg Festival.	Renew management and maintenance agreement with Filberg Heritage Lodge and Park Association.	2024		In progress
			Develop Nautical Days Policy	2024		Complete
			Establish Nautical Days Advisory Committee	2024		Council Committee established, Terms of Reference on March 20 RCM, committee members appointed. Complete
			Dissolve Nautical Days Society	2025		Complete, society will not be dissolved as per Council direction December 4th 2024
		Provide support for community Halloween and Christmas Market events.		2024		Complete. Council resolved to provide funding to the BIA for these events.
		Continue to provide space for Pearl Ellis Art Gallery and Comox Archives and Museum		2024		Complete
		Construct Mack Laing viewing platform.		2024		In progress. Mack Laing demo complete and platform construction tentatively scheduled for April 20,
		Hold annual forums, such as an annual Economic Development and Tourism forum and a Developer's Forum, with key Stakeholders				Developers Forum held in January of 2025.
	Public Safety	Continue provision of health and safety support including smoke detectors, AED's, Fire Smart support and wildfire mitigation, extreme weather event centers, and supporting outreach during extreme weather events.	Direct communications and assistance with citizens on improving their fire safety.	All		Over 60 AED's have been installed across Comox. Extreme weather event policy adopted by Council and Town staff committed to outreach support in conjunction with other valley municipalities during extreme weather events.
		Focus on life saving protection through the timely response to fire rescue and medical emergency situations.	Maintain good response times to emergencies.	All		Service delivery times meet current needs. Current daytime response of less than 2 minutes out of the station. Challenging maintaining an active group of dedicated and trained paid on call firefighters. High turnover. **Update, 18 member left the department in 2025.**
		Active participation in the Regional Emergency Management Program.	Maintain our partnership with other local governments to develop an effective role and response to local emergencies.	All		Staff attend regular meetings of Comox Valley Emergency Planning group and participate in training and exercises. Regional pooling of funds for indigenous engagement has been approved
		Increase public awareness of emergency evacuation routes				CVRD has a grant to update emergency evacuation routes information. Comox Fire Rescue has added links to web site with information about Evacuation routes. Difficult to designate evacuation routes within a small town as the routes are likely to change based on the type and location of an emergency. In a local emergency citizens would be directed by first responders as to which route to use to evacuate town.
		Fire Station Replacement		2026		UPDATE, May 2026: Class A/B construction budget lower than earlier estimates. Project has started with hazardous material abatement followed by demo of old buiulding. Project expected top me completed, Fall 2027. Council provided direction to develop architectural drawings in March 2025. Contract awarded to local company for design(May 2025). Capital Infrastructure grant applied for (June 2025). Update: Council approves financing plan.Things are moving along well. Building permit received. Offices have been relocated to construction trailer behind station. Most of old station items have been removed. Hazmat removeable late April. Demonlisition ealry May. Class A/B budget expected late April. Demolistion

* *Status Colours:* Completed: On Hold: In Progress:

** *Strategic initiative reworded*

Updated: May 13, 2026

	AREA OF FOCUS	PROJECTS AND INITIATIVES	TASKS	YEAR	*	STATUS
ECONOMIC HEALTH	Downtown Vitality	***TOP PROJECT: Complete a Downtown Action Plan to guide future development and balance the need for growth vs. desire to maintain a small-***				Complete with Council consideration of projects on September 11th
		Support downtown beautification through flower beds and routine maintenance.				Continuing
		Provide enhanced development approvals support for downtown projects.				Complete
		Explore and incentivize retail zoning in the downtown				Complete
		Explore establishing a Town of Comox Tourism Commission				Complete
	Balancing Vibrancy &	Promote and support local commercial into residential areas.	Complete communities	2024		Complete
			Rezoning application processing	2024		Complete
			Update home occupation regulations	2025		Complete
		Support the BIA in their renewal and potential boundary expansion process	Support the Renewal of the Downtown BIA	2025		Complete. Regular meetings with BIA initiated.
			Examine the feasibility of expanding the BIA	2025		Complete. BIA has decided to not expand for their next term.
		TOP PROJECT: Complete an Economic Development Strategy and Downtown Enhancement Action Plan.				Complete
		Increase the Town's Employment Lands land base				Complete
	Comox Marina	Complete and provide occupancy to the Marine Services Building.	Building Complete July 2023	2023		Official opening Sep 7, 2023
			Request for Proposals (RFP) for lease of Units 102 & 105, effective Aug 1, 2023	2023		Leases to Big Animal Encounters and Compass Adventure
			Request for Proposals (RFP) for lease of Units 104 & 105, effective Feb 1, 2024	2024		Lease of both Units to Compass Adventure
		Provide marina space to encourage tourism and commercial activities.	2024 Mobile Vendor Renewals	2024		Complete
			Mobile Vendor RFP for 2025-26	2025		Complete
		Improve the pedestrian connection between the Marina and Comox Ave and explore mechanized alternatives				Improved lighting and additional sidwalks on Beaufort
		Install a floating platform off the breakwater		2024		Comox Valley Harbour Authority forwarded our proposal to Small Craft Harbours, a division of the Dept. of Fisheries and Oceans. Via CVHA, they advised the installation of a swim platform does not align with their purpose & mandate of the waterlot so the application is denied.

* *Status Colours:* Completed: On Hold: In Progress:

** *Strategic initiative reworded*

	AREA OF FOCUS	PROJECTS AND INITIATIVES	TASKS	YEAR	*	STATUS
GOOD GOVERNANCE	Community Participation	Develop a pre-application policy with community input requirements to support and broaden community participation.	Develop Application Flow Charts with specific engagement requirements	2024		completed as part of new development application procedure. Consultation will be for OCP amendments only, after Council has had an initial review.
		Further enhance online information regarding proposed developments.	Include development information on website	2024		Complete but opportunities for public engagement decreased through Provincial Regulation changes.
		Continue Town's communication and social media growth to build knowledge and engagement on town projects and initiatives.	Increase website readership	2023		Website views on top five pages (Homepage, Community Centre, Employment Opportunities, Program Registration, Recreation Guide) increased by 20% YTD in Jan 2024 compared to 2023
			Increase social media engagement	2023		Facebook followers up 11% over 2023, to 5200; Instagram followers up slightly to 1140, X followers 2,657 up over 2023 rates of 2,550.
			Promote ReCollect App for solid waste information	2023		Registered users up over 10% to 1987 users. Currently at 2050 (Nov. 2024)
	Relationships	Maintain high levels of support and coordination with other local governments and K'ómoks First Nation.	Consult with K'omoks First Nations on projects of shared interest	2023		Presentation made to K'omoks Chief and Council. Bi-montly meetings between KFN Council and Mayor and CAO have been scheduled.
			Partner with other Comox Valley local governments in the Leisure for Everyone Accessibility Program (LEAP)	2023		Regional program established in April 2023
			Partner with other Comox Valley local governments in establishing a regional accessibility committee to meet legislative requirements	2023		Regional framework adopted November 2023
			Partner with City of Courtenay in regional sports field allocation and centralized booking strategy	2024		Underway completion expected 2026
			Coordinate with City of Courtenay in public engagement strategy for new solid waste	2023		Complete
	Decision Making	Improve ground level data collection and continue to modernize internal processes.	Finance and Public Works Department is exploring Asset Management software to better track and improve coordination of asset management and replacement.	2024-25		In Progress through Complete Communities project. Implementing CityWide Asset Manager software by moving existing asset information and starting to individualize certain previously pooled informaiton. Collaborating with local municipalities on standards.
		Include full life cycle costs in all asset acquisition or expansion decisions.		2024		Full life cycle costing is included in all capital acquisition budgeting decisions

* *Status Colours:* Completed: On Hold: In Progress:

** *Strategic initiative reworded*

BALANCED COMMUNITY PLANNING	AREA OF FOCUS	PROJECTS AND INITIATIVES	TASKS	YEAR	*	STATUS
	Strategic Growth	Ensure appropriate amenity provisions in rezoning applications.		2024		Affordable housing contribution policy will be rescinded as per rising DCC and implementation of ACC's (October 22, 2025 RCM discussion).
		Develop an organization growth plan that supports and enhance the delivery of services as the community grows.	Work with Courtenay and the CVRD to implement recommendations from the 2023 Comox Valley Sport Fields Strategy report (staff report to Council, November 1, 2023).	2024-25		In progress
	Housing	***TOP PROJECT: Update (Complete new) the OCP through community consultation to develop a vision for the future***		*2024*		Complete
		Apply for and complete the Complete Community grant program to support future planning decision making.		2023		Complete. Grant obtained
		Apply for and complete the CMHC Housing Accelerator grant program to accelerate the Town's modernization process and		2023		Complete. Grant obtained
		TOP PROJECT: Develop a Housing Strategy that creates conditions for a diversity of housing options		*2025*		Complete with OCP adoption and prezoning of multi-family lots
	Community Addition	Require greenway and connectivity networks in new developments.		2024		will be identified in new OCP, to be completed end of 2025.
		Complete a DCC review to ensure equity and fairness in cost allocation in new developments.		2024		pending Final Adoption
		Create a community amenity policy for developments.		2024		Affordable housing contribution policy will be rescinded as per rising DCC and implementation of ACC's (October 22, 2025 RCM discussion).
		Increase required bike parking and EV charging capabilities in multifamily development				Complete
		Create a residential tree planting program		2026		Tree protection bylaw scheduled for May

* *Status Colours:* Completed: On Hold: In Progress:

** *Strategic initiative reworded*

TOWN OF COMOX

STAFF REPORT

Meeting: May 13, 2026

STRATEGIC PLANNING COMMITTEE MEETING

TO:	Strategic Planning Committee	**FILE:**	1705-20
FROM:	Edward Henley, Director of Finance	**DATE:**	May 7, 2026
SUBJECT:	Fourth Quarter Financial Update		

Edward Henley

Prepared by:	Report Approved:
Edward Henley, Director of Finance	*Jordan Wall, Chief Administrative Officer*

RECOMMENDATION(S) FROM THE CHIEF ADMINISTRATIVE OFFICER:

That the May 13, 2026 report from the Director of Finance, titled Fourth Quarter Financial Update be received for information.

PURPOSE

To provide periodic financial updates to Council to perform oversight over the financial activities of the Town of Comox.

STRATEGIC PLAN LINKAGE

Strategic Priority Areas of Focus	
Lenses	**Fiscally Responsible** – We will balance the short- and long-term financial impacts of our decisions.
Values	**Disciplined Decision Making** - We are responsible and transparent in our decision making.
Good Governance – Areas of Focus	**Decision Making** - We make evidence-based decisions focused on the best interests of the Town over the long term.
Core Services	Financial management and accountability

BACKGROUND

The purpose of financial reporting is to ensure the transparency and accountability of the local government system.

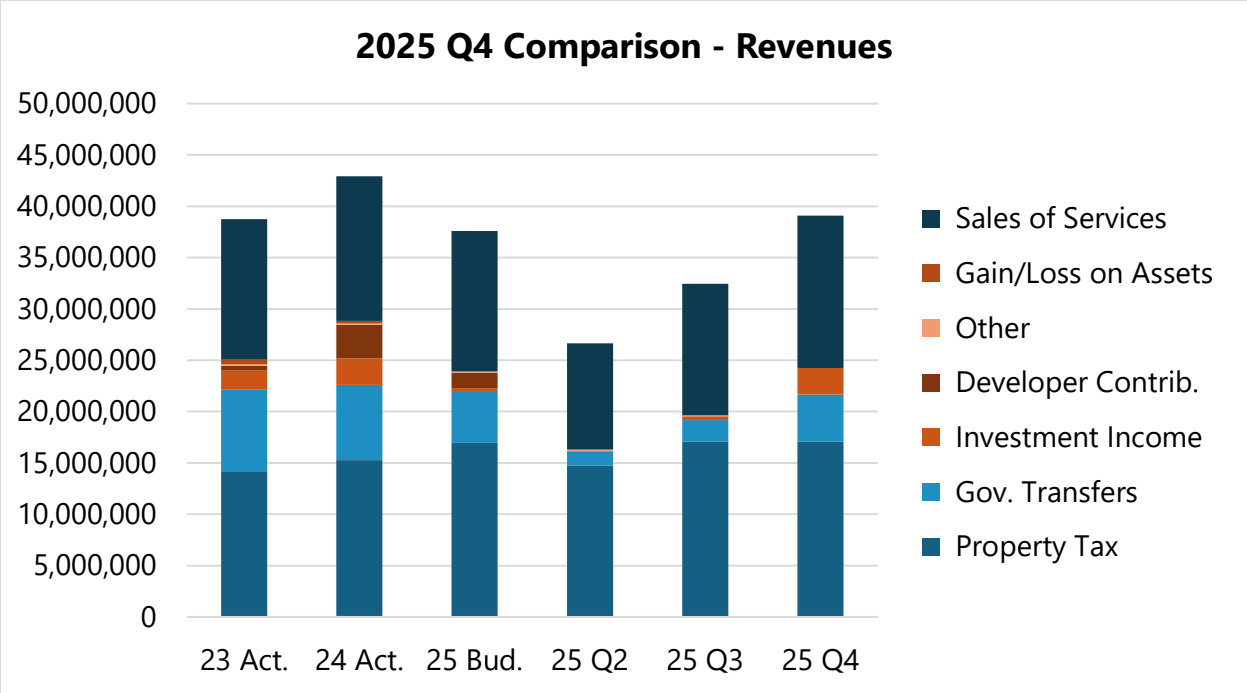
Through the annual budgeting process, local governments are accountable to their citizens and businesses for how they plan to provide necessary public services and projects in a cost-effective manner, and how they intend to raise the funds to pay for those services and projects. The budgeting process helps local governments in determining their tax rates for the year.

Quarterly financial updates provide reporting to Council as to the financial status of the implementation of the financial plan approved during the budgeting process.

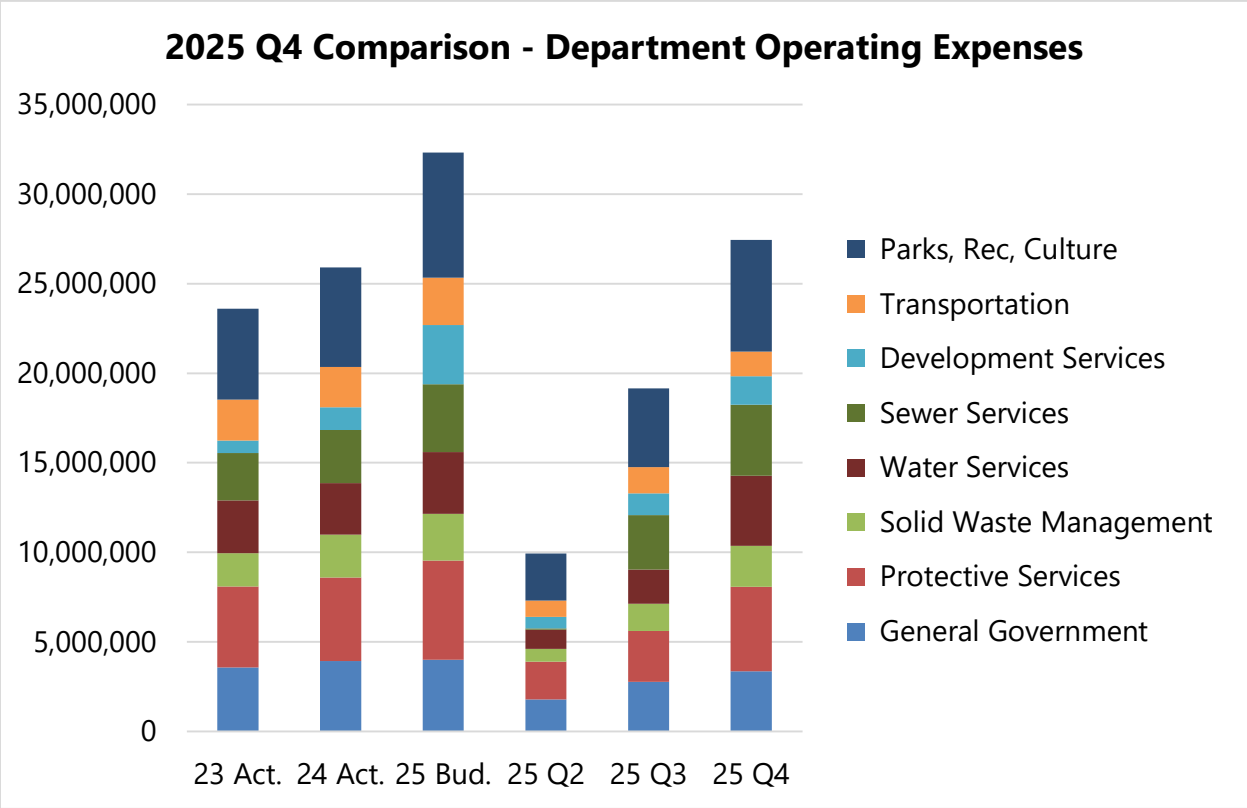
There are a number of appendices attached with the financial numbers in summary and in detail.

ANALYSIS/ISSUES/IMPLICATIONS

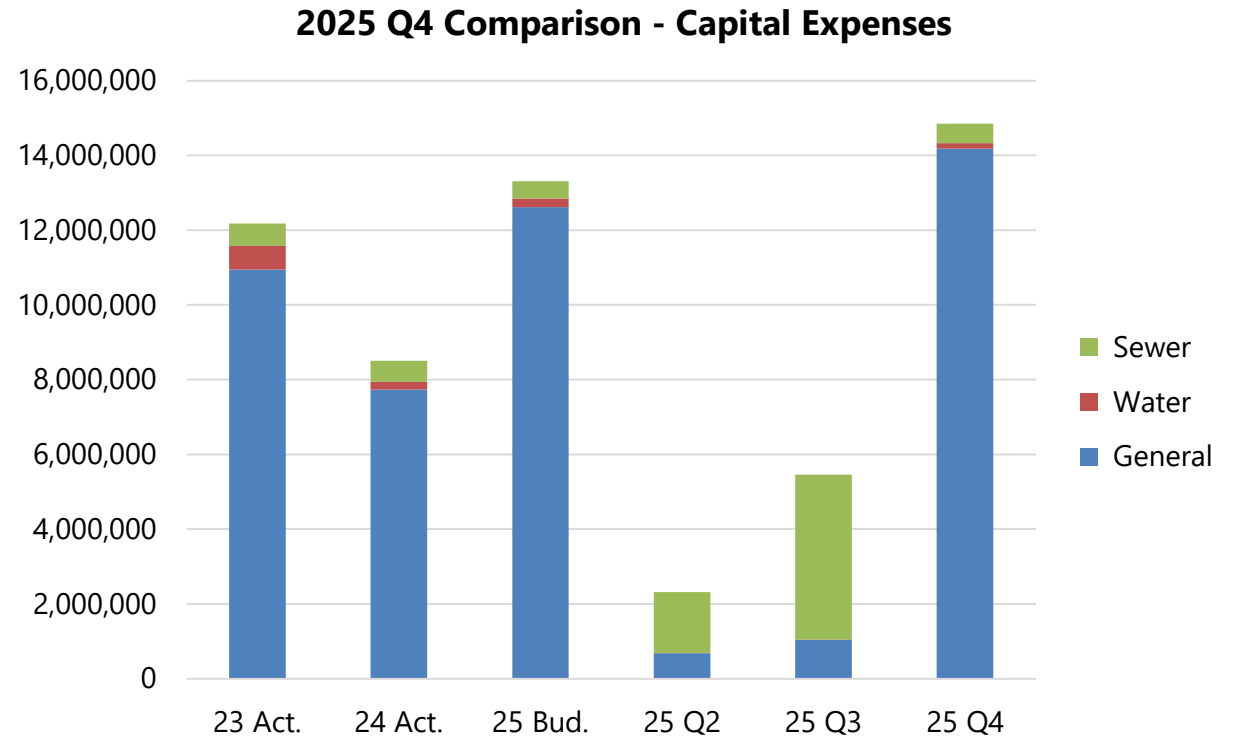
a. Financial



The revenues are collected seasonally and are progressing as anticipated with most taxes paid in Q2 however a significant amount is collected at the beginning of Q3 on the tax due date, including taxes collected by the banks. Government transfers are sporadic and either sent in advance or after the claims are filed or transferred to a 'reserve' until it is recognized as revenue when the funds are spent. Most sales of service are received in Q2 with marina, water, sewer and solid waste generally being billed then. Recreation and metered water fees are collected year-round. 2025 Revenues generally exceeded budgeted.



Some larger billings are a month or two delayed by the vendor after the period it is for. As such the expenses are often a lagging indicator. Operating expenses were lower than budgeted as some special projects came in under budget or are still in progress by year-end and will carry forward to 2026, especially with the HAF grant funded projects in development Services.



Many capital projects started in Q2 and invoices are starting to be paid in Q3 and Q4 as work progresses. Some capital projects are not reconciled until year-end meaning the expenses may not appear until the end of the year. The large amount in Sewer works will be adjusted at year-end. The conveyance project work is being applied to a generic sewer project account until we receive the final split of expenses between sewer, water, roads and drainage projects from the CVRD at the end of the fiscal year. The overage in capital projects is primarily related to the unbudgeted acquisition of a major parkland which was funded from reserves. The 2025 budget is awaiting final budget amendments to be adopted. The sewer spending decreased at year-end as it was a placeholder for the conveyance project spending. The costs were distributed amongst a number of roads, drainage, water and sewer capital projects when the Town received the split of costs by project from the CVRD at year-end.

Special Projects
There is a significant unbudgeted project of $261,797 in Finance. This is a reclassification of a significant unadjusted difference identified by the auditors in the 2020 financial statements. The implementation costs of the Dayforce software were incorrectly recorded as capital in 2020. It does not qualify as capital as the Town does not own the software.

The OCP Review/Update project also went significantly over budget due to several amendments throughout the process and additional Council discussions with consultant support, including a second public hearing. The project is paid for by the Housing Accelerator Fund grant.
(See Appendix 3)

Capital Projects
Fire is showing over budget due to the moving up of a vehicle replacement from the 2026 budget to 2025 which is pending a formal budget amendment.
The firehall architectural costs are not higher than budgeted overall as budgeting was set at $250,000 split between Special Project and Capital and is currently recorded in Capital as staff believe that the spending to date qualifies as capital.

The Balmoral Storm pipe in Transportation was part of the conveyance project. When the pipe was unearthed there were extra costs associated with previously unknown pipes in the ground and additional work required.

Within Parks there are three projects of note. The Balmoral park land was not formally budgeted due to negotiations. It was primarily funded from Development Cost Charges (DCCs) and other reserves. The Lazo Greenway had additional construction costs which were offset by grants and DCCs. The Aspen playground also went slightly over budget due to unanticipated pricing however it too was offset by grants and donations.

The conveyance project work revealed an issue that needed to be resolved with the Glacier View water main to be completed before the roadway was paved and saved money and future disruption to the public from having to dig up the freshly paved road again and repave in a later year.

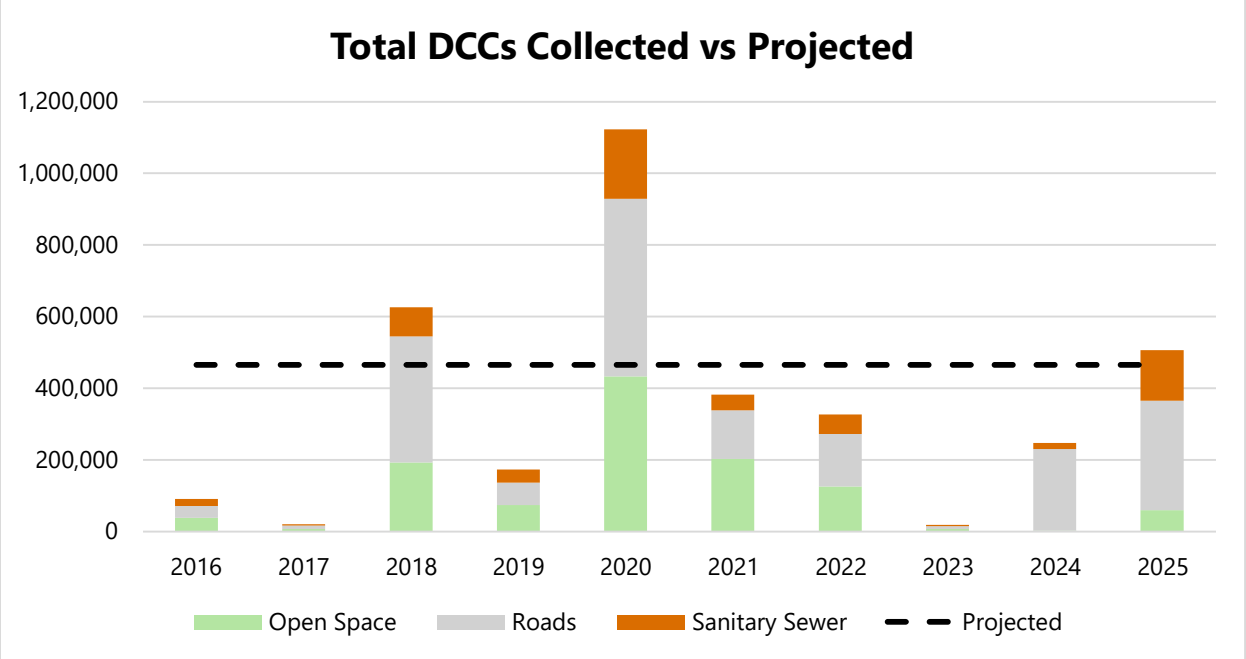
The Beaufort Sewer main had unexpected remediation costs that were revealed during the conveyance project resulting in additional costs. (See Appendix 4)

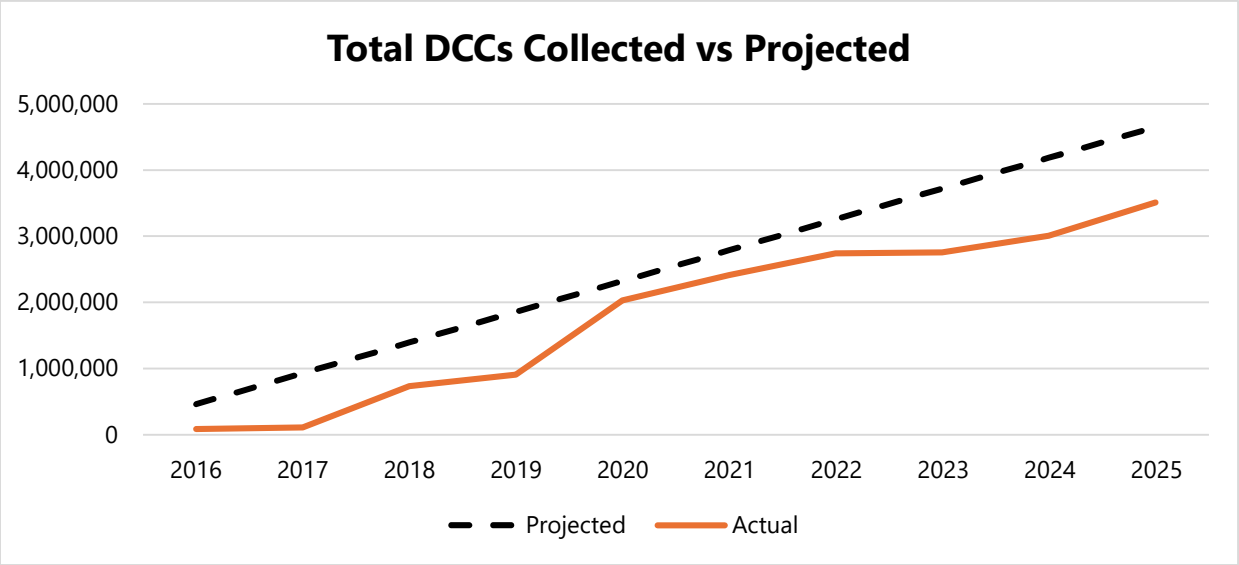
Development Cost Charges

Some new developments receive DCC credits for various reasons which reduce the amount collected. In Q1 there is a credit for a SFD as a house was torn down and replaced with 16 multi-family low density units.

DCC Units collected by Unit Type	SFD (per parcel)	Multi-Family Low Density exc. Downtown (per unit)	Multi-Family High Density exc. Downtown (per unit)	Institutional (per m2)
Q1	-1	16		
Q2	3			413.50
Q3	13	6	96	
Q4	12	2	40	
2025 Total	**27**	**24**	**136**	**413.50**

DCC $ collected by DCC Type	Open Space DCC (Parks & Trails)	Roads DCC	Sewer DCC
Q1	24,365.02	22,080.24	12,028.11
Q2	6,514.86	25,008.49	4,625.10
Q3	5,488.70	193,911.94	78,784.05
Q4	22,612.33	65,133.58	45,244.60
2025 Total	**$58,980.91**	**$306,134.25**	**$140,681.86**




Total DCCs Collected vs Projected
5,000,000
4,000,000
3,000,000
2,000,000
1,000,000
0
2016
2017
2018
2019
2020
2021
2022
2023
2024
2025
Projected
Actual

TOWN OF COMOX

STAFF REPORT

Meeting: May 6, 2026

REGULAR COUNCIL MEETING

TO:	Mayor and Council	**FILE:**	
FROM:	Robbie Nall, Parks Manager	**DATE:**	April 29, 2026
SUBJECT:	Tree Protection Bylaw Update		

Prepared by:	Supervisor:	Report Approved:
Robbie Nall *Parks Manager*	*Shelley Ashfield,* *Director of* *Operations*	*Jordan Wall, CAO*

RECOMMENDATION(S) FROM THE CHIEF ADMINISTRATIVE OFFICER:

1. That Tree Protection Bylaw No. 2063 be given First Reading.
2. That Tree Protection Bylaw No.2063 be given Second Reading.
3. That Tree Protection Bylaw No.2063 be given Third Reading.

4. That the Town of Comox consider Bylaw No. 2063 when determining future tree covenant requirements and discharges; and

   That staff be authorized to remove existing tree protection covenants when the situations arise on low-density properties where community or neighbourhood conditions do not support retaining the covenant

PURPOSE

The purpose of this report is to update Council on the development of the Tree Protection Bylaw, including the results of Council direction and community engagement, and to seek Council consideration of the bylaw.

STRATEGIC PLAN LINKAGE

This report addresses the following strategic priorities identified in the 2022-2026 Strategic Plan:

Community Connection and Wellness	We believe in fostering community connection and enhancing individual and collective wellness.
Parks	Our parks and greenspaces connectivity enhances liveability and walkability in the Town and ensures seaside access for all.
Climate	We will consider and value our natural assets and our unique community features and will take responsibility for our long-term impact on the environment for future generations.

BACKGROUND

The existing Tree Management and Protection Bylaw (Bylaw No. 1125) currently applies to select areas within the Town and to parcels larger than 0.5 hectares. The bylaw has been supplemented by tree protection measures through Development Permit Area (DPA) requirements and rezoning processes.

Recent changes in provincial regulations, including Bill 44, may affect the Town's ability to protect trees, as all land must be pre-zoned. Municipalities are required to update their Official Community Plans (OCPs) and zoning bylaws by December 31, 2025 both of which have been completed by the Town.

At the November 13, 2024 Special Council Meeting, Council supported advancing a special project to update the Comox Tree Management and Protection Bylaw No. 1125. This project was subsequently approved through the 2025 Special Projects Budget.

The Town has also completed its Urban Forest Management Strategy (UFMS), which provides long-term guidance for preserving and enhancing tree canopy, addressing climate change impacts, and adapting to urban growth and development. A series of recommendations resulted from the UFMS for the development of an updated Tree Protection Bylaw.

At the March 11, 2026, Strategic Council Meeting, Council participated in a workshop on the Tree Protection Bylaw update. Council was provided with context on past canopy decline and the role of the bylaw within the Town's broader planning and regulatory framework. Staff outlined the core components of a modern tree bylaw and sought Council input on five key policy areas: size thresholds for regulated and higher-value trees, whether the bylaw should apply town-wide, the circumstances under which permits for tree removal should be issued (particularly distinguishing between development and non-development situations), approaches to tree replacement requirements, and the future role of Section 219 tree protection covenants.

Council directed Administration to proceed with the development of a Tree Protection Bylaw regulating trees on private property, with implementation details to be determined through subsequent work. Council further directed that the bylaw generally allow the removal of most trees on private property with limited restrictions, primarily requiring permits for tracking purposes, and that a permit be required for the removal of trees greater than 30 cm in diameter. Council also directed Administration to develop criteria for identifying significant or ecologically valuable trees that may warrant additional protection and to include a tree replacement requirement within the bylaw framework, with specific ratios to be established at a later stage.

Council feedback and direction from the workshop, and community engagement, informed the development of the draft Tree Protection Bylaw (**Attachment A**).

ANALYSIS AND ISSUES

Public engagement for the Tree Protection Bylaw update was conducted in two phases between November 2025 and April 2026 and included an online survey, a public open house, an online feedback form, and a focus group workshop with industry professionals. In total, the Town received over 200 responses. Engagement results demonstrated strong community support for strengthening and modernizing the Tree Protection Bylaw, including applying the bylaw to private property, enhancing protection for large, native, significant, and environmentally sensitive trees, and prioritizing tree retention over removal (**Attachment B**).

Participants also emphasized the need for clear definitions, fair and consistent permitting, stronger enforcement, and appropriate resourcing, while noting the importance of balancing tree protection with safety considerations, property rights, and development feasibility. Feedback from all engagement activities informed the proposed bylaw revisions presented to Council.

Following the Public Open House and subsequent online survey, community engagement indicated confusion and concern regarding the previous use of the terms “protected trees” and “significant trees.” In response, the terminology has been revised to better align with public understanding and expectations (**Figure 1**). What were previously referred to as “protected trees” are now identified as “regulated trees,” and what were previously termed “significant trees” are now designated as “protected trees.” This change clarifies which trees are subject to heightened protection and addresses concerns that the previous terminology understated the level of protection intended.

Regulated Trees	**Conditions**
Priority Species – most native species with a DBH ≥ 20cm 	• Permit required • Removal/cutting approved for any reason • Replacement requirements apply

A tree other than a priority species with a DBH ≥ 30cm 	• Permit required • Removal/cutting approved for any reason • Replacement requirements apply
Protected Tree *– a tree with a DBH ≥ 60cm* and all trees on Town-owned property 	• Permit required • Must meet conditions for removal to be approved (Dead, unmitigable hazard, wildfire hazard, conflict with approved building footprint, unavoidable conflict with essential site elements, causing damage to buildings, or an invasive tree) • Higher replacement requirements apply

Figure 1. Regulated Trees

The following changes have been made to the proposed Tree Protection Bylaw to reflect Council's direction provided through resolutions adopted at RCM on March 18, 2026:

Regulation of Trees on Private Property

- The proposed Tree Protection Bylaw now applies to all private properties within the Town, in addition to Town-owned lands. Permit requirements and replacement provisions are established to enable consistent regulation and oversight across the community.

Permit Based Removal of Most Trees for Tracking Purposes

- Council directed that the tree protection bylaw allow removal of most trees on private property with few restrictions, primarily requiring permits for tracking purposes.

- The bylaw introduces a tiered framework, under which most regulated (candidate) trees may be removed for any reason with a permit. This approach prioritizes monitoring and data collection while limiting restrictions on routine tree management.

Diameter Threshold for Permit Requirements

- Council directed that a permit be required for the removal of trees with a diameter greater than 30 cm.

- The proposed bylaw requires permits for the removal of trees 30 cm DBH and greater.

The bylaw has also been refined to better reflect the ecological value of native species. Native trees with a diameter of 20 cm or greater are now included as regulated trees, while ornamental species remain subject to a 30 cm threshold. This approach aligns with the current Tree Management and Protection Bylaw, which applies a 20 cm threshold to protected trees on rural lands, and recognizes the long-term canopy and ecological benefits of native species.

Identification and Enhanced Protection of Higher-Value Trees

- Council directed Administration to develop criteria for defining significant or ecologically valuable trees that may require additional protection.

- The minimum size threshold for protected trees has been revised to begin at 60 cm diameter, ensuring that the highest level of protection is reserved for the largest and most valuable trees. Criteria for priority species and other protected categories are clearly articulated, ensuring that larger and ecologically important trees are subject to enhanced protection and more limited removal criteria.

- Priority Trees- A permit is required for the removal of 'Priority Trees', which are a subset of native species over 20 cm in diameter.

Inclusion of Tree Replacement Requirements

- Council directed that the tree protection bylaw include a tree replacement ratio requirement.

- The bylaw introduces a size-based replacement ratio system, with replacement requirements increasing as tree diameter increases. In addition, a mechanism has been added allowing retained trees to offset replacement requirements, incentivizing on-site retention while meeting replacement objectives.

This approach incentivizes tree retention, particularly of larger trees, and provides greater flexibility while maintaining strong overall replacement targets. This change responds to public feedback emphasizing the importance of keeping mature trees on site wherever feasible.

FINANCIAL IMPACTS

The proposed Tree Protection Bylaw will expand the scope of the Town's tree permitting and oversight processes, which is expected to increase administrative and operational demands on staff. Additional effort will be required to process permit applications, respond to inquiries, and implement compliance and enforcement activities. The introduction of the new bylaw will also require the preparation of public education and explanatory materials to support understanding and consistent application of the regulations.

GOVERNANCE CONSIDERATIONS

The updated Tree Protection Bylaw responds to gaps in the existing bylaw that limit tree protection across much of the community and increase vulnerability to canopy loss. The existing Tree Management and Protection Bylaw does not provide protection for trees across most of the community, creating vulnerabilities, especially as development intensifies. With anticipated growth driven by new SSMUH (Sustainable Small-Scale Mixed-Use Housing) regulations, there is a significant risk of increased tree removal, threatening larger trees and ecologically important species. This bylaw update addresses these risks and help mitigate a decline in canopy coverage, which supports climate resilience, community health, and biodiversity. Developing tree regulations will need to be balanced against the desire for increased and more affordable housing provisions as tree protection may increase the complication of development and potentially reduce overall buildable space. Effective updates would prioritize the conservation of mature trees and vital species, ensuring a balance between urban growth and environmental sustainability without placing undue restrictions on new developments.

ATTACHMENTS:

ATTACHMENT A: Draft Tree Protection Bylaw No. 2063
ATTACHMENT B: Summary of Public Consultation

TOWN OF COMOX

BYLAW NO. 2063
TREE PROTECTION BYLAW

A BYLAW TO REGULATE TREE CUTTING AND REMOVAL THROUGHOUT THE TOWN

WHEREAS Council has the authority under Section 8(3)(c) of the *Community Charter* to regulate the cutting of trees;

AND WHEREAS Council considers it in the public interest to regulate the cutting of some trees throughout the Town of Comox;

NOW THEREFORE the Council of the Town of Comox, in open meeting assembled, enacts as follows:

1. TITLE:

This bylaw may be cited for all purposes as the "Tree Protection Bylaw No. 2063".

2. DEFINITIONS:

(1) In this Bylaw:

(a) "Arborist" means a person who is certified by and in good standing with the International Society of Arboriculture as an arborist;

(b) "Arborist Report" means a report prepared by an Arborist in accordance with any requirements set forth by the Town and which clearly identifies the Arborist's name and certification number;

(c) "Applicant" means the Owner(s) whose name appears on an application for a Tree Permit;

(d) "Best Practices" means practices in accordance with the most current version of the American National Standards Institute (ANSI) publication, "American National Standard for Tree Care Operations – Tree, Shrub, and Other Woody Plant Management – Standard Practices" and the companion "Best Management Practices" Series of the International Society of Arboriculture.

(e) "Breast Height" means the point along the trunk of a tree 1.4 metres above the high ground at the base of the tree;

(f) "Bylaw Enforcement Officer" means

(i) the Person appointed by the Town of Comox to enforce Bylaws;

(ii) the Parks Manager and Corporate Officer of the Town of Comox; and

(iii) members of the Royal Canadian Mounted Police and their duly authorized representatives.

(g) "Council" means the Council of the Town of Comox;

(h) "Covenant Tree" means a tree that is the object of a covenant entered in favour of the Town under the *Land Title Act*, s. 219.

(i) "Crown" means the foliage-bearing parts of a tree, but does not include the stem or trunk;

(j) "Cut" or "Cutting" means cutting down, knocking down, dismantling, piercing, or otherwise Damaging any or all parts of a tree regulated by this Bylaw, including the roots, but does not include pruning in accordance with Best Practices;

(k) "Damage" or "Damaging" means

(i) poisoning, burning, or pruning in a manner not in accordance with Best Practices including removal of more than 25% of the tree's total live foliage or bud-bearing branches;

(ii) topping, except under circumstances authorized by the Parks Manager;

(iii) shearing, harming, or undermining the roots;

(iv) denting, gouging, drilling, harming, or affixing anything to the tree;

(v) removing bark;

(vi) doing anything that would cause the tree to die;

(l) "Development Application" means an application made to the Town for a Development Permit, demolition permit, building permit (for exterior work), subdivision, or soil removal permit;

(m) "Development Period" means the period following the approval of a Development Application and before the completion of all activities covered by the Development Application;

(n) "D.B.H." means the diameter of the trunk of a tree measured at Breast Height, or, where a tree has multiple trunks, means the cumulative total of the D.B.H. of each trunk;

(o) "Hazardous Tree" means a tree that has, in the opinion of a person actively holding the Tree Risk Assessment Qualification from the International Society of Arboriculture, a high or extreme risk rating or an imminent likelihood of failure;

(p) "Invasive Species" means a species that is considered invasive by the Town;

(q) "Lot" means a parcel of land;

(r) "Natural Causes", in relation to tree mortality, means naturally contracted diseases, pests, climate conditions, inherent structural defects and senescence;

(s) "Owner" has the same meaning as in the *Community Charter*, S.B.C. 2003, c. 26, or, in relation to a highway referred to in *Community Charter,* S.B.C. 2003, c. 26, s. 35, means the Town of Comox;

(t) "Parks Manager" means the person assigned to that position by the Town or their designate;

(u) "Priority Species" includes the following tree species:

(i) Douglas-fir (Pseudotsuga menziesii)

(ii) Western redcedar (*Thuja plicata*)

(iii) Western hemlock (*Tsuga heterophylla*)

(iv) Grand fir (Abies grandis)

(v) Sitka spruce (Picea sitchensis)

(vi) Western white pine (*Pinus monticola*)

(vii) Shore pine (Pinus contorta)

(viii) Pacific yew (Taxus brevifolia)

(ix) Seaside juniper (*Juniperus maritima*)

(x) Arbutus (Arbutus menziesii)

(xi) Garry oak (Quercus garryana)

(xii) Bigleaf maple (Acer macrophyllum)

(xiii) Trembling aspen (Populus tremuloides)

(v) "Protected Tree" means:

(i) A tree having a diameter of 60 cm or more;

(ii) A tree, regardless of size, growing wholly or partly on land owned or managed by the Town;

(iii) A tree, regardless of size, planted or retained as a condition of a permit, approval, or agreement issued under the authority of a Town of Comox bylaw;

(iv) A Covenant Tree;

(v) A Replacement Tree;

(vi) A Retained Tree;

(w) "Public Utility" means a public utility as defined in the *Utilities Commission Act*, R.S.B.C. 1996, c. 473;

(x) "Qualified Professional" means a person in good standing with a regulatory body set out in the *Professional Governance Act*, S.B.C. 2018, c. 47, who is undertaking work in accordance with the bylaws of the professional regulatory body and practicing within their individual area of expertise;

(y) "Regulated Tree" means:

(i) For a Priority Species, a tree having a D.B.H. of at least 20 cm;

(ii) For a tree other than a Priority Species, a tree having a D.B.H. of at least 30 cm;

(iii) A Protected Tree;

(z) "Remove", "Removing", "Removed", or "Removal" means to Cut a Regulated Tree and remove it from the Lot where it exists;

(aa) "Replacement Tree" means a replacement tree planted as a condition of a Tree Permit under this Bylaw;

(bb) "Reserve Fund" means a fund established by the Town.

(cc) "Retained Tree" means a Regulated Tree, where its preservation is used by the Applicant to reduce on the same Lot the replacement requirements under this Bylaw;

(dd) "Shared Tree" means a tree having a trunk which, at the root collar of the tree, is divided by the legal boundary of a parcel or a highway.

(ee) "Town" means the Town of Comox;

(ff) "Tree" means any species of woody perennial plant that typically has a single trunk or upright stems capable of growing to a mature height of at least 3 metres.

(gg) "Tree Permit" means a permit issued by the Parks Manager under this Bylaw.

(hh) "Tree Protection Fencing" means a barrier in accordance with Drawing L3 "Tree Protection" in the *Subdivision and Development Servicing Bylaw* No.2048, as amended, or a permanent barrier in accordance with any condition for such a barrier made in a Tree Permit;

(ii) "Tree Protection Zone" means the circular area immediately around a Regulated Tree having a radius equal to ten (10) times the D.B.H. plus one half of the D.B.H. when measured outwards from the central point of the tree's trunk, or the area determined by an Arborist to be necessary to ensure no Damage occurs as shown on a plan acceptable to the Town;

(jj) "Works and Services" has the same meaning as in the *Subdivision and Development Servicing Bylaw* No. 2048, as amended;

3. APPLICATION:

(1) This bylaw applies throughout the Town of Comox.

4. PROHIBITION:

(1) No person shall Damage, Cut, or Remove a Regulated Tree or cause, suffer, or permit such a tree to be Damaged, Cut, or Removed, except where permitted by and in accordance with a subsisting Tree Permit.

5. EXCEPTIONS:

(1) This Bylaw does not apply to the Cutting or Removal of a Regulated Tree:

(a) By the Town or its agents during the discharge of their duties;

(b) During a lawful forest practice as defined in the *Forest and Range Practices Act,* S.B.C. 2002, c. 69

(c) From managed forest land as defined in the *Assessment Act*, R.S.B.C. 1996, c. 20, where the Zoning Bylaw allows forestry activities as a primary or secondary use of the Lot;

(d) On crown land of either the Government of Canada or the Province of British Columbia where the tree is Cut or Removed by that entity or its agents;

(e) That is undertaken by a Public Utility, on land owned or held by the Public Utility, and done for the purpose of safety, maintenance, or operation of the Public Utility's infrastructure; and

(f) To accommodate a lawful farm operation as defined by the *Farm Practices Protection (Right to Farm) Act*, R.S.B.C. 1996, c. 131.

6. EMERGENCY CUTTING AND REMOVAL:

(1) Despite any other provision in this Bylaw, a person may Cut or Remove a Regulated Tree before applying for a Tree Permit if the tree in question is in imminent danger of falling and injuring persons or property.

(2) A person who has Cut or Removed a Regulated Tree according to Section 6.1 must:

(a) Apply for a Tree Permit within three business days and provide the Parks Manager with images clearly depicting the tree prior to the Cutting or Removal; and

(b) Not remove from the Lot the portions of the trunk, limbs, roots, or other remains of the tree that are necessary for the Parks Manager to determine there was likely imminent danger prior to the emergency Cutting or Removal, until the Parks Manager has made such a determination.

(3) The Parks Manager may refuse to issue a Tree Permit and may impose a penalty in accordance with this Bylaw, if:

(a) The Parks Manager determines that the Regulated Tree was not in imminent danger or was in imminent danger due to reasons other than Natural Causes; or

(b) The person referred to in section 6.1 fails to abide by any other provision of this Bylaw.

7. APPLICATIONS TO CUT OR REMOVE A REGULATED TREE:

(1) An application for a Tree Permit must be made in writing to the Parks Manager, in the form required by the Parks Manager.

(2) An application for a Tree Permit shall include the following information:

(a) The street and legal addresses of the Lot or boulevard on which the Regulated Tree occurs;

(b) The identity (name and contact information) and signature of the Owner of the Lot;

(c) If the applicant is not the Owner of the Lot, a document signed by the Owner authorizing the applicant as the Owner's agent;

(d) If the Regulated Tree is a Shared Tree, a document signed by all Owners authorizing the application;

(e) The number of Regulated Trees for which an application is being made;

(f) The number of Protected Trees for which an application is being made; and

(g) A short description of the purpose of the Cutting or Removal.

(3) A Development Application involving the Cutting or Removal of a Regulated Tree shall be accompanied by the following:

(a) An Arborist Report that documents:

(i) the species, size, and condition of each Regulated Tree;

(ii) the suitability for retention of each Regulated Tree;

(iii) the Arborist's recommendation for whether each Regulated Tree should be Removed, modified, or retained;

(iv) a summary of the total numbers of Regulated Trees proposed to be Removed and retained;

(v) a summary of the total number of Protected Trees proposed to be Removed and retained;

(vi) a summary of the total number of Replacement Trees required according to this Bylaw.

(b) A tree management plan showing:

(i) the surveyed locations of all Regulated Trees on the Lot, or on the part of the Lot where site disturbance will impact trees;

(ii) the Lot's legal boundaries;

(iii) existing buildings and services;

(iv) proposed buildings and services;

(v) whether each Regulated Tree will be Removed or retained;

(vi) the location and dimensions of Tree Protection Zones for all Regulated Trees; and

(vii) notes describing the measures that will be used to ensure no Damage occurs within the Tree Protection Zones of Regulated Trees that will be retained.

(4) The Parks Manager may determine that section 7.3 is inapplicable when the activities proposed by the Development Application are unlikely to result in Damage to any Regulated Tree.

(5) If the Parks Manager considers it necessary to support an application involving the Cutting or Removal of a Regulated Tree, they may require additional information including but not limited to:

(a) An Arborist Report;

(b) A tree management plan;

(c) A tree risk assessment;

(d) A report by a Qualified Professional in wildfire hazard, geotechnical, environmental, habitat, or other assessments;

(e) Photographs of the Lot and/or the trees in question;

(f) A memo prepared by an Arborist confirming the installation of tree protection measures;

(g) A letter of assurance prepared by an Arborist describing any activities that will require supervision by an Arborist, with the condition that a follow-up memo confirming the supervision took place and any Damage that occurred shall also be submitted; and

(h) A tree replacement plan indicating the number, species, and location for any Replacement Trees to be installed on the Lot.

(6) The Parks Manager may issue terms of reference which further specify the required format and content of materials supporting an application for a Tree Permit.

8. REASONS A TREE PERMIT CAN BE ISSUED:

(1) The Parks Manager, where they consider it necessary, may retain the service of an Arborist or Qualified Professional to independently review materials submitted in support of an application for a Tree Permit or a subsisting Tree Permit.

(2) On being satisfied that the application meets the requirements of this Bylaw, the Parks Manager may issue a Tree Permit, and may attach any terms, conditions, restrictions and requirements to the Tree Permit as they consider necessary.

(3) Notwithstanding section 8.2, the Parks Manager will issue a Tree Permit to Cut or Remove a Regulated Tree, other than a Protected Tree, having received an acceptable application for any purpose of the Cutting or Removal.

(4) Notwithstanding section 8.2 and 8.3, the Parks Manager will issue a Tree Permit to Cut or Remove a Protected Tree, having received an acceptable application and if they are satisfied at least one of the following purposes applies:

(a) The Protected Tree is dead, or more than 50 per cent of the Crown is dead;

(b) The Protected Tree is a Hazardous Tree, and the hazard cannot be mitigated other than by Cutting or Removing the Protected Tree;

(c) The Protected Tree is within an approved building footprint, or unavoidable impacts to its Tree Protection Zone by an approved building footprint will cause Damage;

(d) The Protected Tree will be Damaged by proposed Works and Services that are required to support the permitted use and density of the Lot, where the Works and Services cannot be located elsewhere;

(e) The Protected Tree is causing damage to a lawfully erected building or lawfully constructed Works and Services that cannot be mitigated other than by Cutting or Removing the Protected Tree;

(f) A Qualified Professional has recommended the Protected Tree be Cut or Removed to mitigate a present wildfire hazard in the form required by the Parks Manager;

(g) The Protected Tree is an Invasive Species;

(h) The Protected Tree must be Cut or Removed to comply with another Town of Comox bylaw; and

9. PERMIT AUTHORITY:

(1) The amount of time for which a Tree Permit is valid is as follows:

(a) For a Tree Permit related to a Development Application, the first of:

(i) one year from the date that the final occupancy permit is issued for the Lot, and

(ii) five years from the date of issuance; and

(b) For a Tree Permit not related to a Development Application, one year from the date of issuance.

(2) The Parks Manager may suspend, revoke, or cancel a Tree Permit if they consider that work or activity being carried out is in violation of any terms, restrictions, requirements, or conditions of the Tree Permit or any provision of this Bylaw, or that Damage, whether or not it is accidental, has occurred or is likely to occur to any Regulated Tree.

10. REPLACEMENT TREES

(1) A Tree Permit may specify as a condition that Replacement Trees must be planted by the Owner for each Regulated Tree Cut or Removed.

(2) The number of Replacement Trees required will be determined by the Parks Manager according to the following:

(a) For each Regulated Tree Cut or Removed, the number of Replacement Trees that must be planted is given in the following table:

D.B.H. of Cut or Removed Tree	Replacement Trees

19 cm and smaller	1
20 – 59 cm	2
60 – 69 cm	3
70 – 79 cm	4
80 – 89 cm	6
90 – 99 cm	8
100 cm and larger	10

(b) The total number of Replacement Trees required will be reduced by the Parks Manager by one (1) for each Retained Tree designated in connection with the Tree Permit, to a minimum of zero (0) Replacement Trees required; and

(c) Notwithstanding item (c), no reduction for Retained Trees will be provided where a Tree Permit application is made for the purpose of Removing more than ten (10) Regulated Trees from a Lot, or where a Tree Permit application's approval would result in more than ten (10) Regulated Trees having been removed from the Lot in the previous two calendar years.

(3) For clarity, nothing in item 10.2b results in any continuing credit in favour of the Applicant and against the Town in relation to Replacement Tree requirements.

(4) The species of a Replacement Tree must be selected from a list of acceptable tree species maintained by the Town as follows:

(a) Where one (1), two (2), or three (3) Replacement Trees are required, at least one Replacement Tree shall be a medium or large canopy species;

(b) Where four (4) or more Replacement Trees are required, at least one quarter (25%) of the Replacement Trees shall be a large canopy species;

(c) When the removed tree was a Priority Species, one (1) Replacement Tree or half of the total number of Replacement Trees required, whichever is more, must be a Priority Species.

(5) Replacement Trees must be planted on the Lot for which the Tree Permit is issued.

(6) The Owner must ensure that each Replacement Tree is planted and maintained in accordance with Best Practices.

(7) Stock used for Replacement Tree planting must meet the following requirements, unless otherwise authorized by the Parks Manager:

(a) If a coniferous species, have a minimum height of 1.4 metres; and

(b) If a deciduous species, have a minimum diameter of 4 centimetres, measured at the base of the tree.

(8) Replacement Trees shall be sited:

(a) A minimum of 2 metres away from an existing or approved building footprint;

(b) A minimum of 1 metre away from an existing or approved impermeable surface, such as a driveway, walkway, or surface parking;

(c) Where practicable, offset from underground Works and Services; and

(d) Unless a small tree with limited expected height growth, a minimum of 3 metres from the path of overhead utilities.

(9) Notwithstanding section 10.5, the Town may accept cash in lieu of Replacement Tree planting, subject to the following:

(a) The amount charged per Replacement Tree shall be specified in the *Fees and Charges Bylaw,* No. 2058, as amended;

(b) Where the application for a Tree Permit concerns a Development Application, the Parks Manager shall be satisfied that the Replacement Tree(s) would not have sufficient growing space on the Lot before accepting the cash in lieu;

(c) Where the purpose of the Removal is to mitigate a present wildfire hazard as recommended by a Qualified Professional, and there is no sufficient space on the Lot to plant a Replacement Tree of a more suitable species, the Parks Manager will waive any associated cash-in-lieu amount;

(d) Where the purpose of the Removal is a valid emergency removal as described in Section 6, the Parks Manager will waive the replacement requirement and any associated cash-in-lieu amount; and

(e) The amount charged per Replacement Tree shall be deposited in a Reserve Fund created by the Town for the planting and maintenance of trees.

(10) Where the Town accepts cash in lieu of Replacement Tree planting for a tree Cut or Removed from Town-owned property or a highway vested in the municipality, the Parks Manager may determine that the amount charged for Replacement Trees shall equal the fair appraisal value of each tree being Cut or Removed according to the appraisal method preferred by the Town.

11. TREE PROTECTION MEASURES:

(1) Prior to any construction, demolition, excavation, or installation of Works and Services occurring on the Lot, the Owner must install Tree Protection Fencing around the Tree Protection Zones of Regulated Trees that will be retained, wherever site disturbance will occur within five (5) metres of their Tree Protection Zones.

(2) A person must not damage, destroy, or alter an authorized Tree Protection Zone or Tree Protection Fencing for any purpose other than tree protection, except as otherwise authorized.

(3) Written consent from the Parks Manager is required for any alterations to a Tree Protection Zone or Tree Protection Fencing during the Development Period.

(4) Notwithstanding sections 11.1 and 11.2, if the Owner requires temporary access to a Tree Protection Zone or temporary removal of Tree Protection Fencing during the

Development Period, or if the installation of Tree Protection Fencing is unsuitable at the site due to terrain or safety hazards, the Parks Manager may determine that alternate protection measures may be used for the period during which no Tree Protection Fencing is in place.

(5) Alternate protection measures must include supervision by an Arborist of any work within a Tree Protection Zone.

(6) Where supervision by an Arborist is required:

(a) the Owner must provide a letter of assurance signed by the Owner and an Arborist confirming the nature of the work and the alternate protection measures that will be used; and

(b) following the work, the Arborist who supervised must provide a memo confirming whether the work was carried out as planned and detailing any Damage that occurred.

12. FEES AND SECURITIES:

(1) The Owner shall pay to the Town a fee as set forth in the *Fees and Charges Bylaw* at the time an application for a Tree Permit is submitted, in the manner required by the Town.

(2) The fee charged for a Tree Permit application shall be waived where the application concerns only the removal of a dead tree, an invasive species, or a Hazardous Tree.

(3) If the planting of Replacement Trees is a condition of a Tree Permit in connection with a Development Application, the Owner shall pay to the Town a refundable security in the amount equal to 125% of the equivalent cash-in-lieu value of the replacement tree planting prior to permit issuance.

(4) The security for Replacement Trees will be refunded 2 years after planting, provided that the Replacement Trees are in satisfactory condition.

(5) If the preservation of Regulated Trees is a condition of a Tree Permit in connection with an active or pending Development Application, the Owner shall pay to the Town a refundable security as follows prior to permit issuance:

(a) The amount of security for preserved Regulated Trees shall equal 125% of the estimated value of the trees, where the estimated value for each tree is the greater of $1,000 or the appraised value as determined by the Parks Manager using the appraisal method preferred by the Town;

(b) The total amount of security required under this Section may not exceed $15,000 for a single family dwelling on an existing Lot; and

(c) The total amount of security required under this Section may not exceed $150,000 for each subdivision, development permit, development variance permit or rezoning application.

(6) The Town will hold the security for Regulated Tree preservation for the duration of the Development Period.

(7) At the conclusion of the Development Period, the Town will:

(a) Return 100% of the security for Regulated Tree preservation where no unauthorized Damage has occurred; or

(b) Return a portion of the security if Damage has occurred. The portion returned will equal the amount of the security less the costs of any inspection, mitigation, assessment, removal, or other work recommended by an Arborist in relation to the Damaged tree(s).

(8) Notwithstanding section (5), the amount of the security paid to the Town for Regulated Tree preservation will be $0 if the Parks Manager is satisfied that any relevant Regulated Tree(s) have no risk of being Damaged by the proposed site disturbance or any other action in connection with the Development Application.

(9) Following the completion of all activities in connection with a Tree Permit, upon receipt of a written request, the Town will return any remaining securities subject to a site inspection at the discretion of the Parks Manager to confirm all requirements have been met.

13. INSPECTIONS:

(1) Pursuant to Subsection 16(6)(d) of the *Community Charter,* the Town has the authority to enter onto property for the purpose of inspecting Regulated Trees, and/or the conditions of a subsisting Tree Permit.

(2) Where the Cutting or Removal of trees has been authorized by the Town, and a valid and subsisting Tree Permit exists, the person undertaking the Cutting or Removal shall identify with a flag, paint, survey tape or other adequate means each tree to be cut or removed.

(3) Where the Parks Manager considers that a contravention of this Bylaw has occurred, the Parks Manager may notify the Owner in writing of the contravention and require that measures be taken to remedy the contravention within a specified period, or where no period is specified, within 30 days.

(4) A Bylaw Enforcement Officer or their designate, may issue a stop work order if any Regulated Tree is being Cut without a Tree Permit or contrary to a Tree Permit or this Bylaw, or if any Regulated Tree is being Damaged or Removed in contravention of this Bylaw. Upon receipt of a stop work order, the Owner and all persons having notice must immediately cease the Cutting, Removal, or activity causing Damage and must not resume unless authorized by a Bylaw Enforcement Officer.

(5) The Owner must ensure the Tree Permit is displayed on-site in a location visible to the public prior to the commencement of the Cutting or Removal and until the completion of the Development Period to inform community members that a permit is in place.

14. ENFORCEMENT:

(1) When requested by a Bylaw Enforcement Officer, or any other person authorized by the

Town, any person who has apparently committed an offence under this Bylaw, will correctly state their name and address.

(2) Every person will at all times comply with any lawful order, direction, signal, or command made or given by a Bylaw Enforcement Officer, or other person authorized by the Town, in the performance of their duties enforcing the provisions of this Bylaw.

(3) Each day that an offence continues shall constitute a separate offence against this bylaw.

15. OFFENCES:

(1) Any person who contravenes any provision of this Bylaw, or who suffers or permits any act or thing to be done in contravention of this Bylaw, or who refuses, omits, or neglects to fulfill, observe, carry out, or perform any duty or obligation imposed by this Bylaw is guilty of an offence and is liable, upon summary conviction, for penalties of up to $50,000 as prescribed by this Bylaw or by the Offence Act, R.S.B.C. 1979, Chapter 304 and amendments thereto.

(2) Any person who contravenes any provision of this Bylaw, or who suffers or permits any act or thing to be done in contravention of this Bylaw, or who refuses, omits, or neglects to fulfill, observe, carry out, or perform any duty or obligation imposed by this Bylaw is liable, on summary of conviction, and may be issued a bylaw notice as permitted under the provisions of the *Bylaw Notice Enforcement Bylaw No. 2004* and the *Local Government Bylaw Notice Enforcement Act, SBC 2003 c. 60*.

16. LIABILITY:

Any person who contravenes any provisions of this Bylaw is liable to the Town for, and must indemnify the Town from, all costs, expenses, damages, and injuries resulting from the contravention.

17. SEVERABILITY:

(1) If any section, subsection, clause or phrase of this Bylaw is held to be invalid for any reason by a court of competent jurisdiction, the invalid portion shall be severed and the decision that it is invalid shall not affect the validity of the Bylaw.

18. REPEAL:

(1) "Comox Tree Management and Protection Bylaw No. 1125, 1994" is hereby repealed.

19. Adoption

READ A FIRST, SECOND and THIRD time this day of , 2026

ADOPTED this day of , 2026

MAYOR

CORPORATE OFFICER

Town of Comox
Tree Protection Bylaw



Engagement Summary

April 29, 2026

Submitted to:
Town of Comox
1809 Beaufort Avenue
Comox, BC
V9M 1R9

DIAMOND HEAD
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Vancouver, BC 604.733.4886

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1.0 Key Findings

Phase 1

A total of 63 participants shared their input on the Town's Tree Protection Bylaw Update through an online survey. The key findings are as follows:

- **Where and how the bylaw should apply**
  - Strong support for broad application of the bylaw, particularly to development-related tree removal, environmentally sensitive areas, and residential properties.
  - Emphasis on flexibility, timely approvals, and consistent enforcement to avoid overly rigid or blanket rules.

- **Types of trees that should be protected**
  - Strong support for protecting large and very large trees, native species, and trees in environmentally sensitive areas.
  - Support for enhanced protection of significant trees, with recognition of the long-term canopy value of smaller trees and the need for safety-related flexibility.

- **Objectives for protected trees**
  - Strong support for replacement requirements, certified arborist involvement, and incentives that prioritize retention of mature trees.
  - Concern that replacement planting, fees, or hazard exemptions could enable avoidable loss of mature trees, highlighting the need for clear rules and safeguards.

- **Resourcing the Tree Protection Bylaw**
  - Equity and fairness identified as the top resourcing priority, followed by cost recovery and service efficiency.
  - Strong enforcement, clear communication, and meaningful penalties viewed as essential.

- **Overall feedback**
  - Broad support for strengthening and modernizing the Tree Protection Bylaw, viewed as overdue and necessary.

Phase 2

A total of 110 participants provided feedback on the Town's draft Tree Protection Bylaw Update through an Open House and 30 participants who provided feedback following the open house. This phase also included a Focus Group Workshop with 14 participants representing the arboriculture, building, and design professions locally. Key findings from Phase 2 engagement are as follows:

- **Defining protected trees and reasons for removal**
  - Community concern about allowing tree removals for any reasons for trees between 30 cm – 75 cm DBH, noting that this could weaken the meaning and purpose of protected tree status.
  - Support for strong protection for high-value trees, including trees that are very large or provide wildlife habitat.

- **Tree protection requirements**
  - Participants requested clearer definitions and procedures for key terms, including "hazardous tree," to support consistent interpretation and implementation.
  - There was support for flexible approaches to Tree Protection Zones that consider site conditions, tree species and tree sizes.

- **Where the bylaw should apply**
  - Very strong community support to apply the bylaw to all private property.
  - Concern about whether current bylaw enforcement resources are sufficient to support effective implementation.

- **Tree replacement**
  - Participants supported higher replacement ratios to offset tree removals by new planting.
  - Moderate support for several removal options, including applying cash-in-lieu, establishing tree density targets and setting a maximum number of replacement trees.
  - Support for higher fines and stronger fee requirements especially where unauthorized removals occur.

- **Overall feedback**
  - There is community support to create a strong Tree Protection Bylaw that improves tree regulation across public and private properties in the Town.

2.0 Scope of the engagement

The Town of Comox is updating its Tree Protection Bylaw to ensure it aligns with community values, local priorities, and best management practices. This report presents the results from the two phases of engagement for this project.

2.1 Phases of engagement

- **Phase 1** of this project was conducted through an online survey delivered alongside Phase 2 of engagement for the draft Urban Forest Management Strategy. The survey was available from November 14 to December 19, 2025 and had 63 respondents.

- **Phase 2** of engagement occurred in April 2026 and was made up of a Focus Group Workshop attended by 14 participants, a public Open House attended by 110 participants, and an online feedback form with 30 entries.

2.2 Communication tactics used

Information about engagement opportunities was disseminated through several media, including:

- Postings on the Town of Comox and Engage Comox Valley websites;
- Town of Comox's social media accounts;
- Town of Comox newsletter;
- Newspaper advertisements, ads;
- Posters on display in Town parks and facilities.

3.0 Phase 1 Engagement – Survey

Survey respondents reported learning about the engagement process and opportunity to comment on the tree bylaw through print advertisements (40%), followed by word of mouth (29%) and social media (25%) (Figure 1). The Town website (21%) and the Engage Comox Valley project website (16%) were also important sources of information, while other sources (14%) accounted for a smaller share of responses.

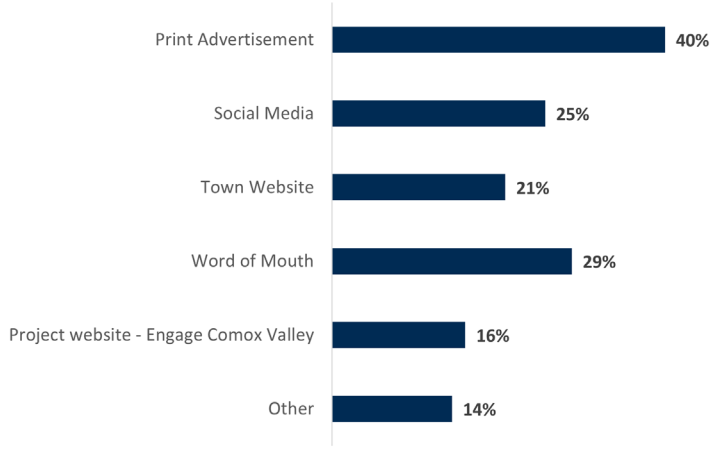


Figure 1. Means by which respondents heard about the survey (Skipped: 0| Answered: 63).

3.1 Survey demographics

The survey was completed by 63 participants who engaged through the combined survey. Among the 63 survey respondents:

- Over 90% are 35 years or older (Figure 2)
- 85% live in Comox, 33% work in Comox, 67% access shopping, recreation and other activities in Comox, 3% go to school in Comox and 10% responded 'other' (Figure 3)
- 90% own their own home and 2% are renters
- 88% live in a single detached house or duplex
- 28% live in East Comox; 26% live in Central Comox; 21% live in West Comox; 17% live Downtown; and 7% live in North Comox (Figure 4)

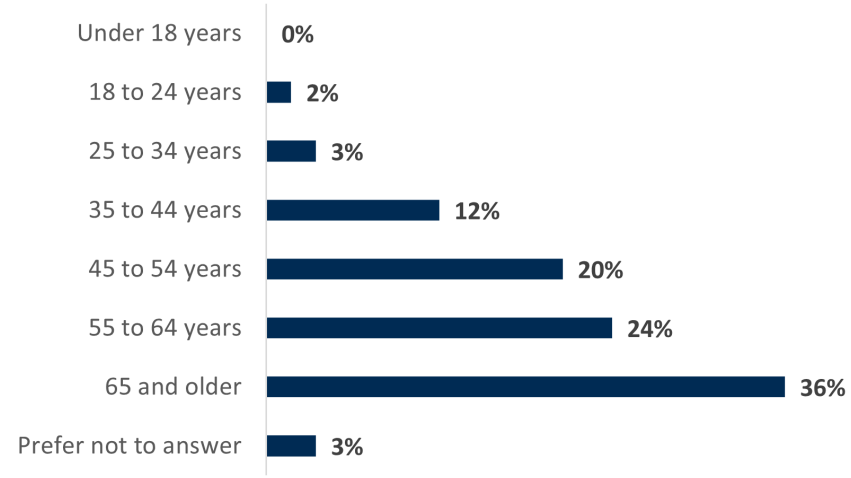


Figure 2. Age distribution of survey respondents (Skipped: 4| Answered: 59).

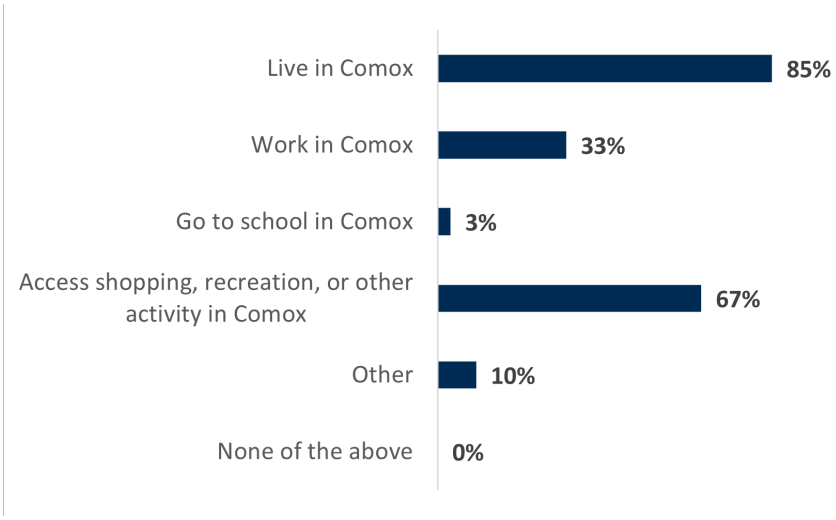


Figure 3. Ways that respondents spend their time in Comox (Skipped: 2| Answered: 61).

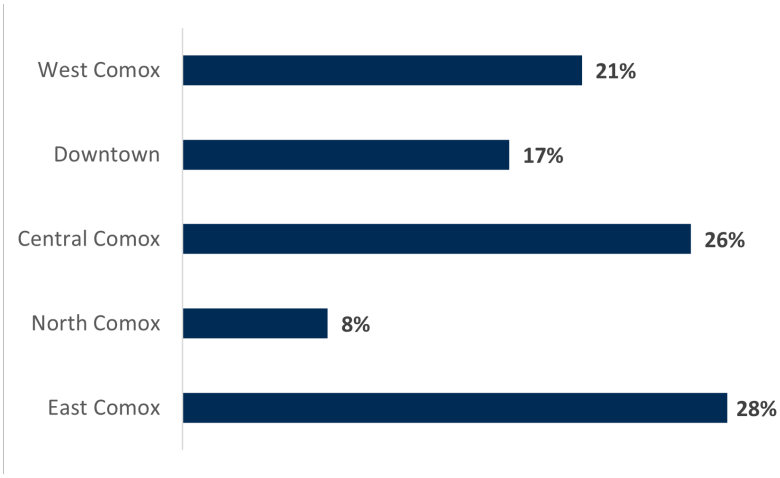


Figure 4. Respondents' neighbourhoods of residence (Skipped: 10| Answered: 53).

3.2 Experience with tree removal

Respondents were asked to report the circumstances that led them to remove trees on their property. The most common reason for removing trees was due to tree death (40%), followed by safety concerns related to hazardous trees (32%), other reasons (21%), wildfire risk (4%), and, least commonly, development-related requirements (2%). Some respondents who selected 'other' noted that tree removal on their properties resulted from multiple circumstances described in the question, with some having to remove multiple trees over the years. Others explained that removals were necessary due to trees overgrowing onto neighbouring properties or roots damaging private infrastructure such as sewer lines and walkways. Of the total 63 survey respondents, 48 answered this question and 15 skipped it.

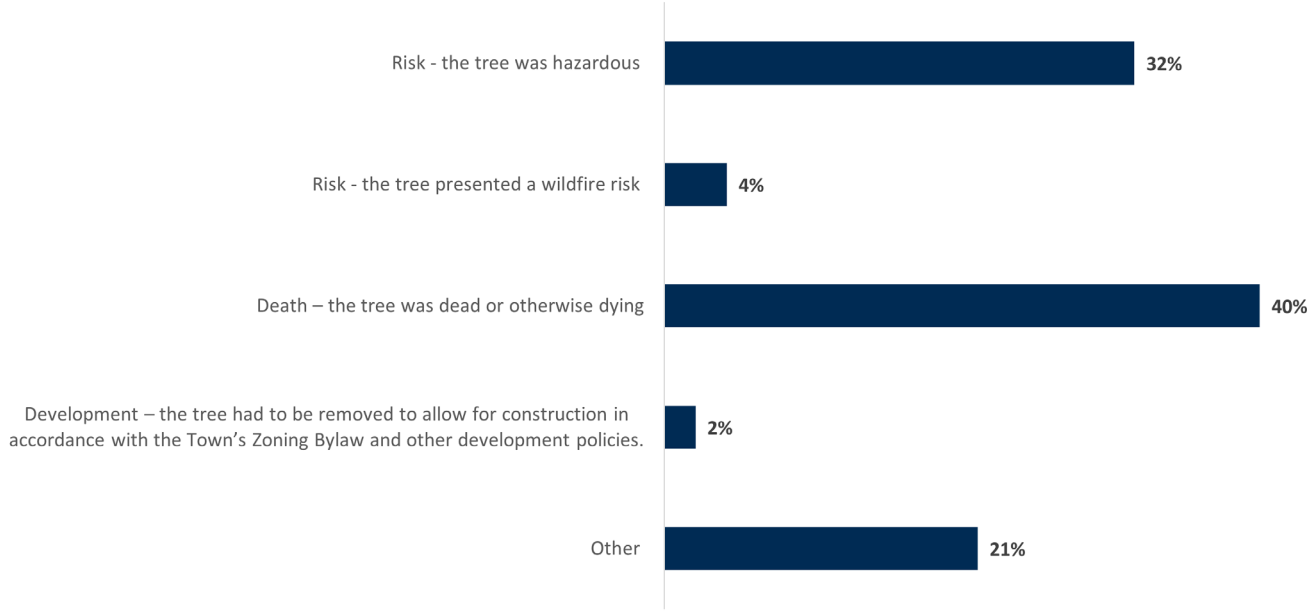


Figure 5. Circumstances that respondents have encountered when trying to remove a tree on their property (Skipped: 15| Answered: 48).

3.3 Survey results

This section summarizes the results from the Tree Protection Bylaw Update of the survey. The survey collected feedback on:

- Perspectives on where and how the tree protection bylaw should apply;
- Feedback on the types of trees that should be protected;
- Views on the objectives for protected trees;
- Priorities for resourcing the tree bylaw;
- Additional feedback on the updated tree bylaw.

3.3.1 Perspectives on where and how the tree protection bylaw should apply

Survey respondents were presented with three statements about where and how the tree bylaw should apply and asked to indicate their agreement with each statement using a five-point scale, where 1 represents *strongly disagree* and 5 represents *strongly agree*.

Most respondents (77%) agreed with applying the tree bylaw to all private properties within the municipal boundary, regardless of lot size, with 71% selecting a rating of 5 and 6% selecting a rating of 4 (Figure 6A). Thirteen percent selected ratings of 1 or 2, indicating disagreement, while 10% selected a neutral rating of 3.

Agreement was strongest for regulating tree removal associated with development, with 87% of respondents selecting ratings of 5 (81%) or 4 (6%) (Figure 6B). Eleven percent (11%) selected disagreement ratings of 1 or 2, and 2% selected a neutral rating of 3.

Similarly, most respondents (79%) supported regulating general tree cutting or removal. In this case, 71% selected a rating of 5 and 8% selected a rating of 4, while 11% indicated disagreement with ratings of 1 or 2 and 10% selected a neutral rating of 3 (Figure 6C).



Figure 6. Respondents' agreement with proposed objectives for where and how the updated bylaw should apply, rated on a five-point scale from 1 (*Strongly Disagree*) to 5 (*Strongly Agree*) (A – C Skipped: 0 | Answered: 63).

Thirty-eight (38) respondents provided comments explaining why they agreed or disagreed with the proposed objectives for where and how the updated tree bylaw will apply. Comments reflected both broad support for expanded application as well as concerns about municipal overreach on private property. Respondents who agree with widely applying the tree bylaw feel that regulations are important for protecting the urban forest, preventing canopy loss and improving climate resilience. Conversely, a small number of respondents in disagreement with widely applying the tree bylaw were outright against regulations on their private properties.

Many expressed nuances in their support. Common concerns included government overreach, overly rigid or blanket rules, and potential delays or uncertainty in permitting. Various comments called for case-by-case decision-making and timely permit approvals. Respondents also mentioned the need for consistent enforcement, clear penalties, and standardized decision-making tools. Education and incentives were proposed by some as important tools for supporting implementation of the tree bylaw, while others proposed them as alternatives to implementing the tree bylaw. One commenter highlighted that they would like to see the Town provide support for low-income or vulnerable property owners to ensure equitable and effective implementation of the tree bylaw on private land.

3.3.2 Feedback on the types of trees that should be protected

Using a five-point scale where 1 represents *strongly disagree* and 5 represents *strongly agree,* survey respondents expressed their agreement with the proposed objectives for defining protected trees in the updated tree bylaw (Figure 7).

Most respondents (64%) supported applying tree protection to any tree with a trunk diameter at breast height of at least 20 cm, with 48% selecting a rating of 5 and 16% selecting a rating of 4 (Figure 7A). Twenty percent (20%) selected a neutral rating of 3, while 16% selected ratings of 1 or 2.

Support was higher for applying protection to native tree species at a smaller minimum size, with 79% of respondents selecting ratings of 5 (61%) or 4 (18%) (Figure 7B). Thirteen percent (13%) selected a neutral rating of 3, and 8% selected disagreement ratings of 1 or 2.

The strongest level of support was for protecting trees of any size within environmentally sensitive areas, such as streamsides or steep slopes. In this case, 96% of respondents selected ratings of 5 (86%) or 4 (10%) (Figure 7C). Opposition was minimal, with 2% selecting a rating of 1 and 3% selecting a rating of 3.

Similarly, there was strong support for including specific, stronger protection measures for significant trees, including those that are very large, very old, rare, or culturally or ecologically valuable. Ninety-four percent (94%) of respondents selected ratings of 5 (84%) or 4 (10%) for this objective (Figure 7D), with minimal opposition.

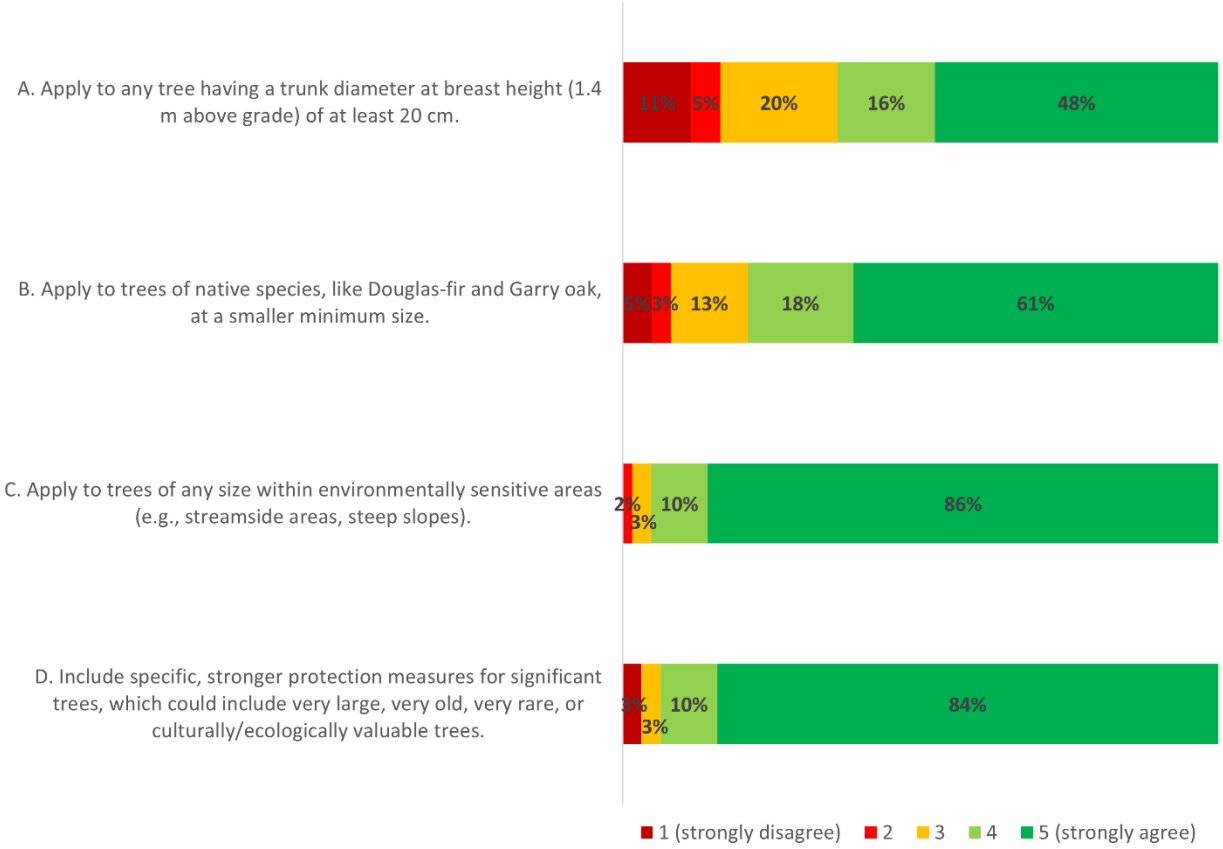


Figure 7. Respondents' agreement with the proposed objectives for defining protected trees under the tree bylaw, rated on a five-point scale from 1 (*Strongly Disagree*) to 5 (*Strongly Agree*) (A,C,D Skipped: 0 | Answered: 63; B Skipped: 1 | Answered: 62).

Respondents provided twenty-seven (27) comments on which trees should be protected. Many respondents supported lowering the size threshold for protection, commonly suggesting 10 cm DBH instead of 20 cm DBH, noting that smaller trees still represent several years of canopy growth. There was emphasis on prioritizing native species, significant and long-lived trees, and trees in environmentally sensitive areas such as riparian zones and steep slopes, with some respondents also calling for protection of native shrubs and entire plant communities. At the same time, respondents stressed the need for flexibility to address safety risks, poorly maintained or compromised trees, fire hazard concerns, and site-specific conditions.

"Each situation is unique, making hard/fast regulation challenging to get right. For example, smaller trees not protected by a bylaw may be tomorrow's climate adapted large tree."

- Survey respondent

3.3.3 Views on the objectives for protected trees

Survey respondents indicated their agreement with protection measures that could be required through a municipal tree bylaw using a five-point scale, where 1 represents *strongly disagree* and 5 represents *strongly agree* (Figure 8).

Most respondents (84%) agreed with requiring replacement trees to be planted when protected trees are removed, or requiring fees for off-site planting where on-site replacement is not feasible. In this case, 70% selected a rating of 5 and 14% selected a rating of 4 (Figure 8A). Twelve percent (12%) selected a neutral rating of 3, while 9% selected disagreement ratings of 1 or 2.

Strong support was shown for a measure proposed to require reporting by a certified arborist to support tree removal and/or to recommend special protection measures such as arborist supervision. Eighty-nine percent (89%) of respondents selected ratings of 5 (74%) or 4 (15%), indicating they agree with this objective (Figure 8B). Neutral responses accounted for 3%, and 8% selected disagreement ratings of 1 or 2.

Support was highest for including provisions or penalties that incentivize tree retention, particularly of the healthiest mature trees. In this case, 89% of respondents selected ratings of 5 (76%) or 4 (13%) (Figure 8C), with minimal neutrality or disagreement.

There was also strong support for allowing requirements to be reduced, streamlined, or modified in special circumstances, such as when a tree poses a hazard to life or property. Eighty-nine (89%) percent of respondents selected ratings of 5 (75%) or 4 (14%) for this objective (Figure 8D), while opposition and neutral responses were limited.

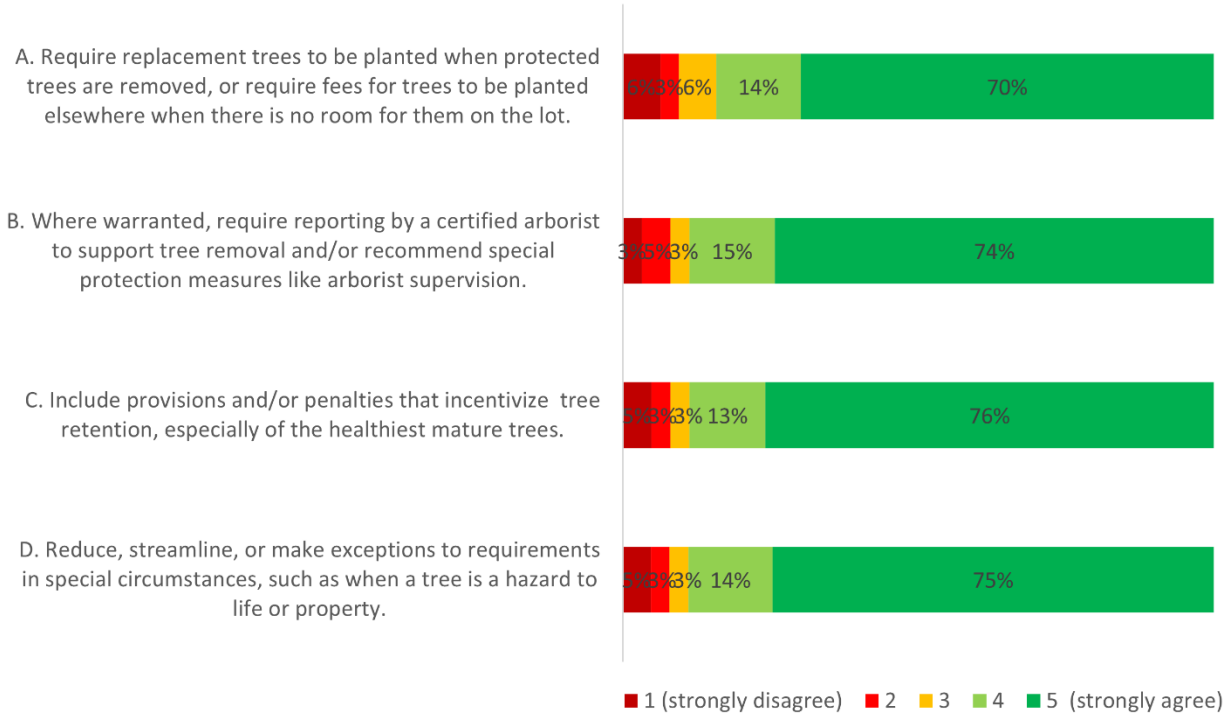


Figure 8. Respondents' agreement with proposed tree protection measures that could be required through a municipal tree bylaw, rated on a five-point scale from 1 (*Strongly Disagree*) to 5 (*Strongly Agree*) (A, D Skipped: 0 | Answered: 63; B, C Skipped: 1| Answered: 62).

Twenty-seven (27) comments were provided regarding respondents' agreement with the protection measures the bylaw should require. Respondents commented on the need to better distinguish tree loss related to development compared to removals on individual private properties, with several questioning whether proposed approaches will place undue burden on property owners. Many are concerned that mature trees are too easily removed through replacement planting, fees, or "hazard" claims, and called for stronger protection of existing trees and clearer rules around what qualifies as protected. Others stressed the importance of clear accountability, defined processes, and straightforward approvals, particularly for safety-related removals. There were also calls for requirements such as arborist evaluations, regulation of removal timing, clearer standards for replacement trees and species, restrictions on removals during nesting season and other ecologically important timeframes, and an approach that balances tree protection with housing, infrastructure needs, and property rights.

3.3.4 Priorities for resourcing the tree bylaw

Survey respondents were asked to consider how the implementation of an expanded municipal tree bylaw should be resourced, recognizing that additional staffing would likely be required to respond to inquiries, process permit applications, and enforce bylaw provisions. Respondents were presented with several resourcing considerations and asked to rank them in order of preference. The options reflected different trade-offs between cost recovery (e.g. higher permit fees and penalties) to reduce impacts on the municipal budget, equity and fairness (e.g. lower permit fees for those with less ability to pay) to resource the tree bylaw, without reducing other services, and service efficiency (e.g. pursue staff reallocation before setting higher fees or taxes), possibly resulting in reduced services elsewhere.

Survey results indicate equity and fairness was the highest priority for resourcing implementation of a new tree bylaw, with the highest average score (2.08), followed by cost recovery (2.04) and service efficiency (1.75).

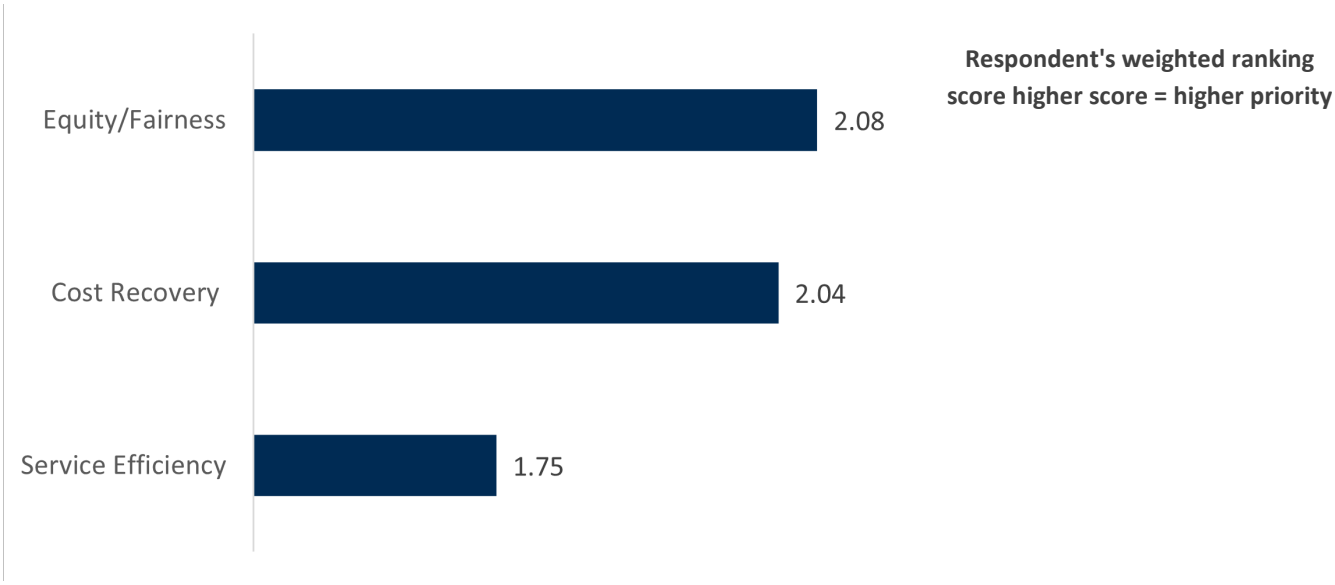


Figure 9. Respondent priorities for resourcing implementation of an expanded municipal tree bylaw, based on weighted averages (Skipped: 15| Answered: 48).

3.3.5 Additional feedback on the tree bylaw

Twenty-five (25) respondents provided final thoughts on the tree bylaw update. Overall, most respondents express support for modernizing and strengthening tree protection in Comox, alongside concerns about cost, administration, and impacts on property owners. Many respondents view the bylaw as overdue, workable, and consistent with approaches used elsewhere in Canada. They emphasized the need for firm, specific rules that prioritize long-term environmental protection and community well-being over short-term development profit. A few respondents expressed willingness to support higher taxes or increased municipal investment to ensure adequate staffing, enforcement, and expertise, particularly through hiring additional arborists.

"It is well thought out and certainly overdue. I hope it will go far enough. Needs to be resourced so it can be enforced. Communication & public education will be important. Community organizations can assist."

- Survey respondent

At the same time, several respondents voiced concerns that excessive bureaucracy, high fees, or inflexible rules could discourage tree planting, increase resentment, or unfairly burden homeowners. Some individual respondents raised the importance of fairness, cost recovery aligned with ability to pay, incentives for tree retention (such as tax breaks or water allocations), clear and timely processes for addressing safety and nuisance concerns, and strong communication and public education.

4.0 Phase 2 Engagement – Open House, Focus Group, Online Feedback

4.1 Open House

On April 8th, 2026, 110 people attended the in-person Open House about proposed bylaw updates. The event included a drop-in session with informational boards where participants could speak to project team members and leave comments and feedback on the proposed bylaw. A total of 110 participant comments were received through the open feedback poster board.



General feedback

- **Support for tree protection:**
  - *Support tree protection on private property (53 mentions)*
  - *Concern about allowing removals for any reason for trees between 30 cm and 75 cm in DBH (21 mentions)*
  - *Support for tree retention on development sites (20 mentions)*
  - *Request for smaller DBH thresholds (11 mentions):*
    - *Request for smaller DBH thresholds for Protected Trees (9 mentions)*
    - *Request for smaller DBH thresholds for Significant Trees (2 mentions)*
  - *Support for tree retention incentives (5 mentions)*
  - *Support for a list of protected trees as a schedule (3 mentions)*
  - *Support for protection of nesting trees (3 mentions)*

- **Tree replacement:**
  - *Support for replacement ratios (15 mentions)*
  - *Support for native replacement trees (3 mentions)*
  - *Support for climate adapted replacement trees (2 mentions)*

- **Concerns around tree protection on private property:**
  - *Do not support tree regulation on private property (4 mentions)*
  - *Support annual tree removal allowance (2 mentions)*

Feedback on FAQ materials to support the bylaw

- *Request for education materials to encourage private property tree retention (5 mentions)*
- *Request for a list of approved replacement tree species, including native species (2 mentions)*

4.2 Focus Group Workshop

The project team presented the proposed bylaw directions to a group of 14 professionals representing the local arboriculture, building, and design trades on April 8th, 2026. The workshop consisted of an introductory presentation followed by table discussions on four bylaw topics. Overall, workshop participants were generally "able to live with", or were supportive of, the proposed directions across the four topic areas (Figure 10).

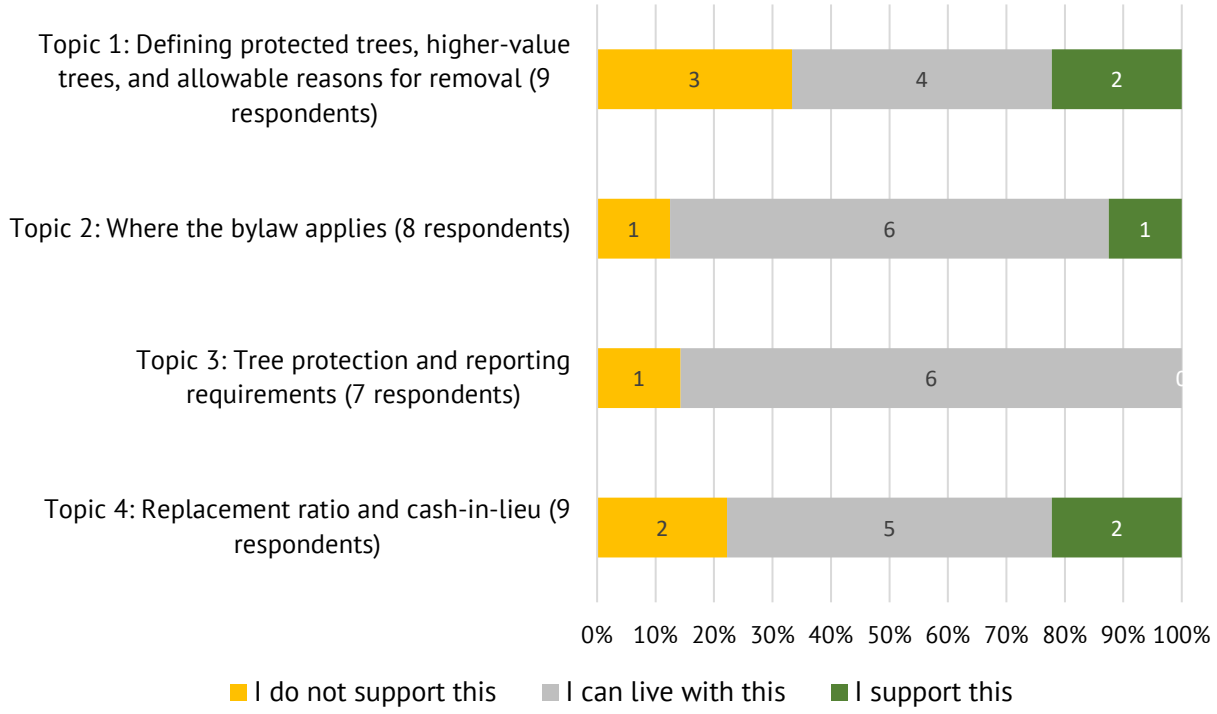


Figure 10 Level of support for the four topics presented during the Focus Group Workshop.

4.2.1 Topic 1: Defining protected trees, higher-value trees, and allowable reasons for removal

Support:

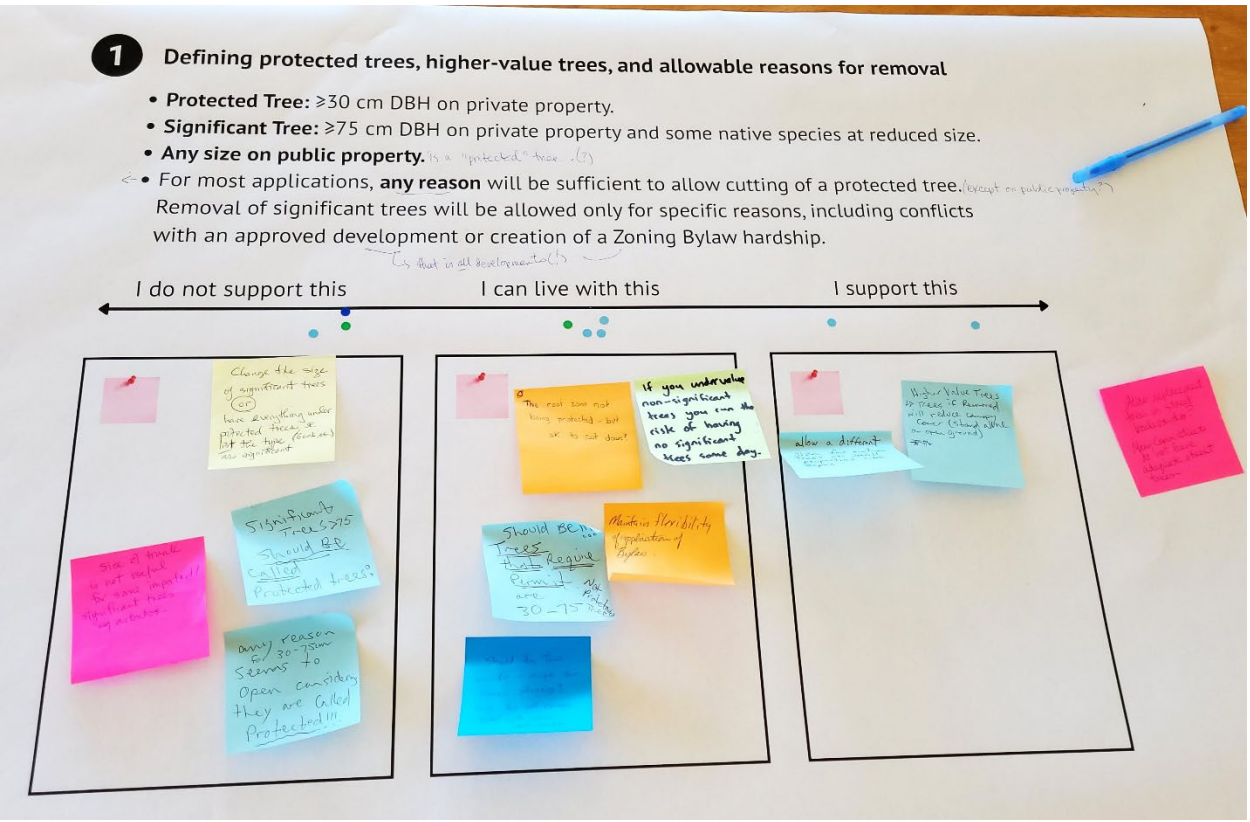
- *Recognition of higher-value trees whose removal would cause a meaningful loss of canopy.*
- *Flexible replacement options, including adjusted size standards for native trees on small lots.*
- *Allowing replacement trees in boulevards where streets are underplanted.*

Can live with:

- *Flexibility in bylaw application, including how permit rules are applied.*
- *Treatment of 30 to 75 cm trees as permit-triggering rather than fully protected.*

Do not support:

- *Concern with allowing removal of 30 to 75 cm trees for any reason, since that weakens the meaning of protected trees.*
- *Concern with relying mainly on trunk diameter to define significance, especially for species like arbutus.*
- *Concern with the current distinction between "protected" and "significant" if it creates confusion or excludes important species.*



4.2.2 Topic 2: Where the bylaw applies

Support:

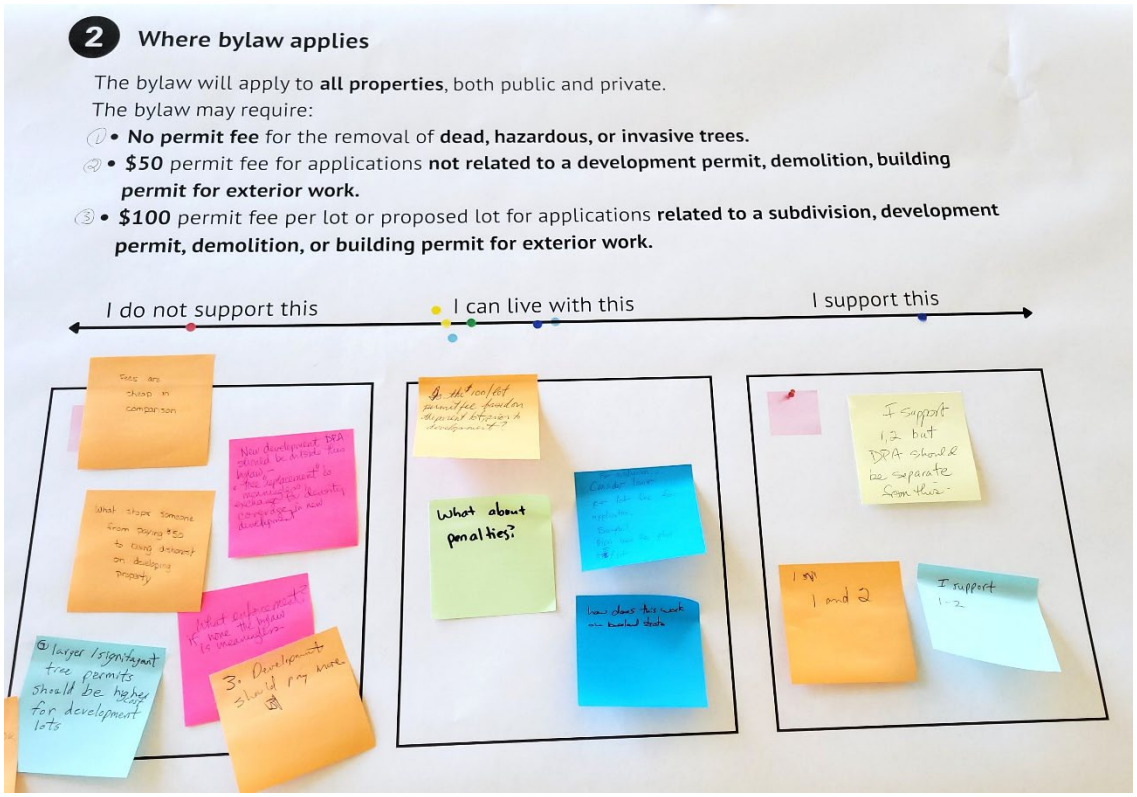
- *Support for charging no permit fee for removal of dead, hazardous or invasive trees and $50 permit fee for applications not related to development.*
- *Support for separating the DPA process from tree bylaw permitting.*
- *The general direction of the first two fee options.*

Can live with:

- *Need for clarification on how the fee structure would apply to bare land strata and parent lots.*
- *A lower per-lot subdivision fee structure, such as a base fee plus a smaller amount per lot.*

Do not support:

- *Concern that the proposed fees are too low and too easy to absorb.*
- *Concern with the current fee structure for development lots, with comments that development should pay more and larger or significant tree permits should cost more.*
- *Concern with a system where someone could pay a small fee and still avoid meaningful oversight or be dishonest during development.*
- *Concern with including new development DPA situations in this bylaw, especially where tree replacement becomes a tradeoff for added density.*
- *Concern with a bylaw without clear enforcement.*



4.2.3 Topic 3: Tree protection and reporting requirements

Can live with:

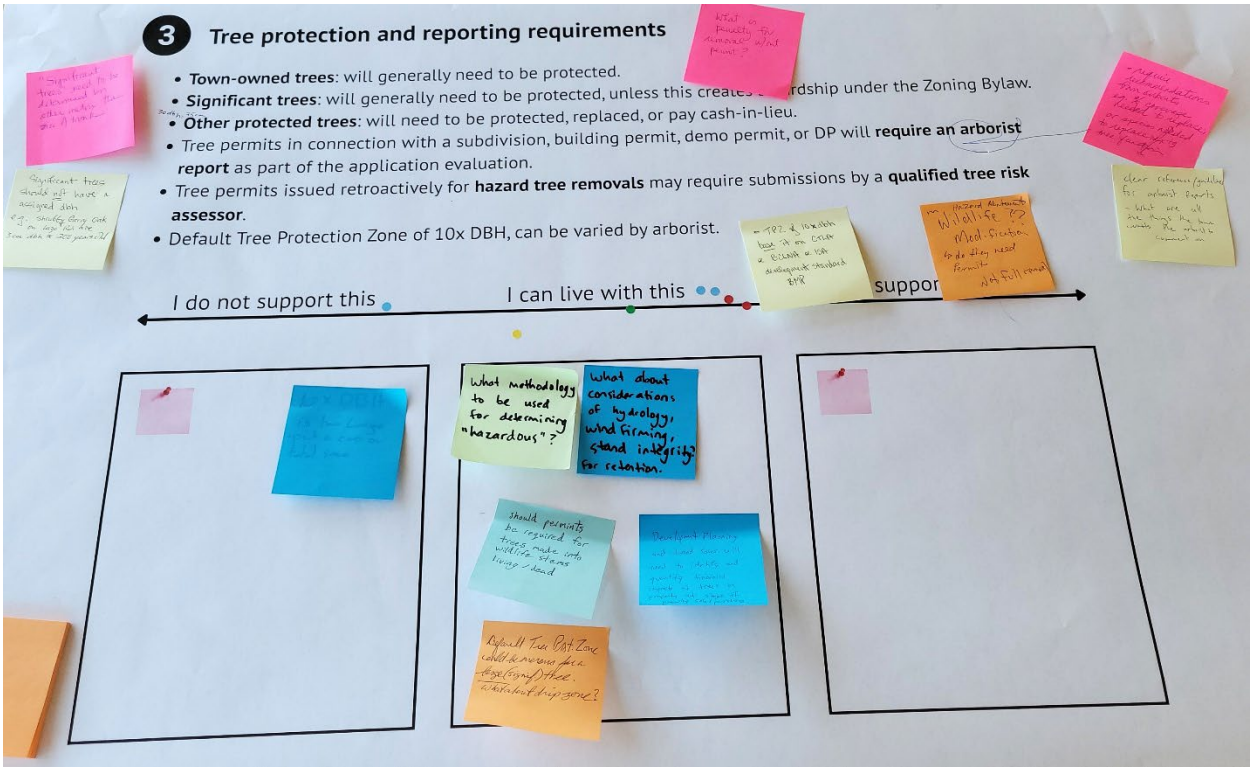
- *Need for a clear methodology to define "hazardous" trees.*
- *Consideration of hydrology, windfirmness, and stand integrity in retention decisions.*
- *Early identification and quantification of financial impacts of trees during development planning and land transactions.*
- *Clarification on whether permits are required for creating or modifying wildlife trees (living or dead stems).*
- *Flexibility in TPZ approaches for large trees, including alternatives such as dripline-based approaches.*

Do not support:

- *A rigid TPZ of 10× DBH without limits, viewed as too large and impractical.*

Other:

- *Move beyond DBH as the sole metric for defining significant trees.*
- *Recognition that small DBH trees can still be high value (e.g., older Garry oak).*
- *Need for clear penalties for unauthorized tree removal.*
- *Requirement for defined arborist report standards and content.*
- *Interest in prescriptive arborist recommendations (e.g., canopy replacement targets, species selection by function).*
- *Alignment of TPZ standards with CTLA, BCLNA, and ISA BMP guidance.*
    - *Clarification on hazard abatement processes, including when permits are required versus modification instead of removal.*



4.2.4 Topic 4: Replacement ratio and cash-in-lieu

Can live with:

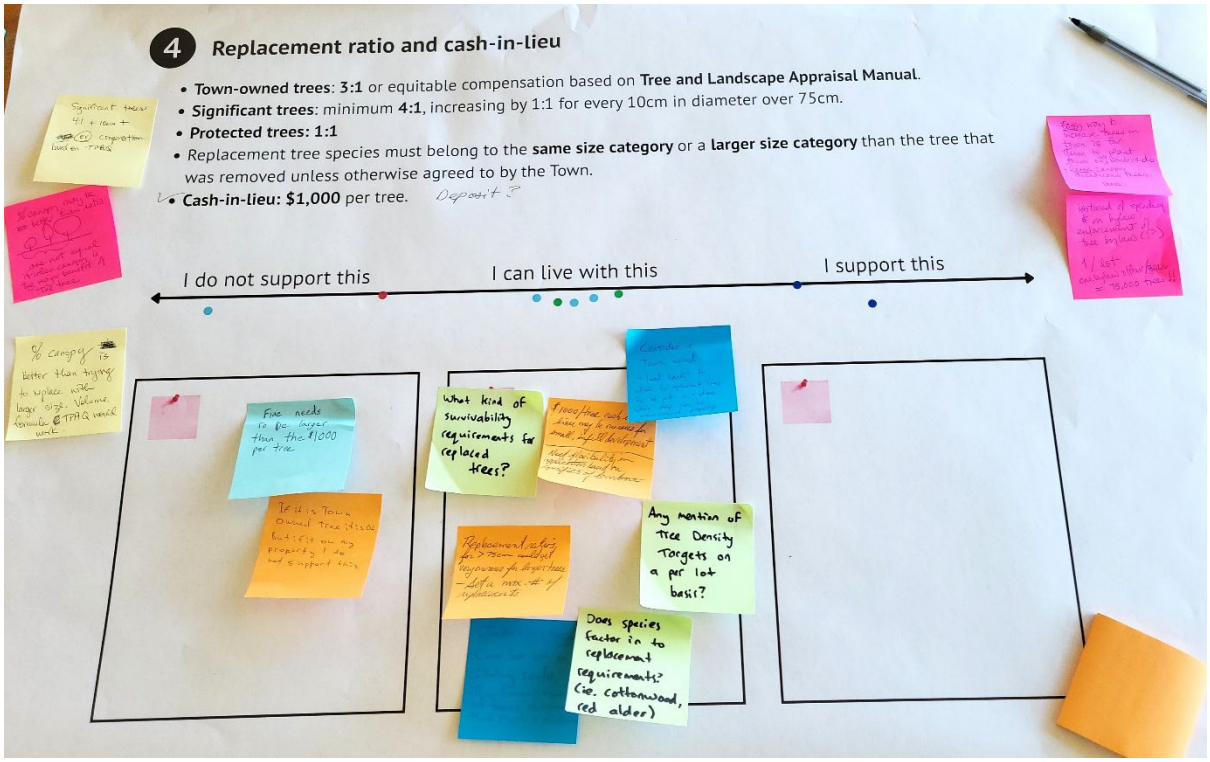
- *Survivability requirements for replacement trees.*
- *Flexibility in applying cash-in-lieu for small infill development based on site context.*
- *Use of a town-owned land bank to place replacement trees where they can grow successfully.*
- *Setting a maximum number of replacements for very large trees (>75 cm).*
- *Considering species when determining replacement requirements (e.g., cottonwood, red alder).*
- *Establishing tree density targets on a per-lot basis.*
- *Sliding scale for cash-in-lieu, where per-tree cost decreases as more trees are removed.*

Do not support:

- *Current fine levels, with $1,000 per tree viewed as too low.*
- *Applying the same requirements to private property as to Town-owned trees.*

Other:

- *Interest in compensation approaches such as 4:1 replacement for significant trees or use of Tree and Plant Appraisal Qualification.*
- *Preference for canopy-based or volume-based replacement metrics rather than simple tree counts.*
- *Recognition that canopy is the primary benefit, and small and large trees are not equivalent.*
- *Suggestion to reconsider allocation of enforcement resources (e.g., bylaw staffing levels).*
- *Suggestion to increase municipal planting, especially in boulevards with large canopy trees.*



4.3 Online Feedback Form

The Town of Comox invited online public feedback on the Town's website from April 9th to April 22nd, 2026. A total of 30 responses were received. Of the responses, 28 were received from individuals and 2 from non-profit organizations. Responses are summarized below.

Comments:

- *Support tree protection on private property (22 mentions)*
- *Concern about impacts that being able to remove a protected species without any reason may cause (13 mentions)*
- *Stronger protection for existing trees, especially trees under the 'Protected Tree' threshold, native species, wildlife trees or very large trees (11 mentions)*
- *Stronger enforcement and permit requirements, including clearer fines, better monitoring, and consequences for unauthorized removals or non-compliant contractors (7 mentions).*
- *Stronger replacement and compensation requirements, including higher replacement ratios, canopy- or volume-based replacement, and caution about relying on cash-in-lieu (6 mentions).*
- *Provide increased guidance and tree management support to homeowners, including recommended species lists, education, planting support and increased access to the Town's arborist (5 mentions)*
- *Support differentiating removal requirements and allotments for homeowners and developers, requiring stricter parameters for developers to adhere to, including minimum trees required per lot (3 mentions)*
- *Concern about added regulation over tree removal on private land (1 mention)*

5.0 Next Steps

Input from the public Open House, the Focus Group Workshop, and online feedback form will inform the Tree Protection Bylaw Update that will be presented to Council for consideration in spring 2026.

Appendix 1 Online feedback responses

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Tue 4/21/2026 12:11 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Tue, 04/21/2026 - 12:11

Submitted by: Anonymous

Submitted values are:

First name:
Albert

Last name:
Mahon

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
Solid, high, and long hedges should come under the fence height bylaw regulations. If a hedge can't be walked through, it's a fence. My neighbor has a cedar hedge 40-feet high and 50-long that blocks sun coming into my garden, it's a 40-foot high solid wall along my prop line, drastically diminishing my garden crops and taking away sunlight from my yard, which is unfair and I have no say about. Also, this high cedar hedge is a fire hazard, and such hedges are now illegal in the Okanagan due to the dangerous fires they create. Next year this hedges will be 42-feet tall, and soon 50-feet tall, because they do not maintain it. Hedges that are basically fences, should be limited to 6-feet height, like any other fence. As for enforcement, there is no need to enforce, but classing solid hedges as fences does provide neighbors leverage when there is an issue. Other cities already consider solid hedges in their fence bylaw, and define them solid if they can't be walked through (solid >6'-wide is a fence). Such provision would still allow for broken high hedges, that could walked through.

Outlook

New Tree Bylaw Fails our Neighbourhoods

From Barbara Berger [redacted]
Date Sun 4/12/2026 4:59 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Comox Councillors and Staff
The new tree bylaw fails our communities in a variety of ways. Firstly the idea of tracking tree removals is not going to do anything for the welfare of our tree canopy. There needs to be protection from tree removal that is based on sound input. Secondly it is understandable that some trees need to be removed for development but clearing the land of all vegetation before building is not a design for tree integration. Integrating trees into the property is a must, especially the older trees. Thirdly, volume based replacement must be implemented. Not all trees are equal in that you cannot compare a 150 yr old tree to a thirty year old one. The older the tree, the more it will take to replace it, if at all. Large trees do so much more for the community at large regarding soil retention, shade during heat domes, water retention during atmospheric rivers, parks and public spaces we all benefit from. It is important to note that the majority of people in the community want a tree canopy for these reasons. Planting more trees in public spaces should be a priority in Comox.

Sincerely,

Barbara Berger

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Sat 4/18/2026 12:20 AM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Sat, 04/18/2026 - 00:19

Submitted by: Anonymous

Submitted values are:

First name:
Beverly

Last name:
Botelho

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
Perfect! Very happy with the proposal of the tree bylaw.
Thank you.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Tue 4/21/2026 2:07 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Tue, 04/21/2026 - 14:06

Submitted by: Anonymous

Submitted values are:

First name:
Brent

Last name:
Sundquist

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
My concern is that the by-law needs a strong detection and enforcement mechanism ensures that the tree by-law does not end up like other Town of Comox by-laws that are regularly ignored ie; parking of vehicles on streets too close to crosswalks, commercial vehicles over 5tons parking on streets for extended periods, recreational vehicle users camping on neighborhood streets etc which are all visible to by law officers as they drive past them yet no enforcement occurs...if the tree by-law is managed using a similar fashion trees will still get cut down where there not supposed to..Town of Comox needs to develop an online portal for residents to report by-law infraction concerns.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Fri 4/10/2026 1:13 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Fri, 04/10/2026 - 13:13

Submitted by: Anonymous

Submitted values are:

First name:
Claire

Last name:
Donovan

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
I support all the protections and regulations and increase in canopy cover for trees on all properties of Comox as outlined on the info. boards. I am not in favour of any reason being sufficient to allow cutting of a protected tree. I could not see reasons listed.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Thu 4/9/2026 6:19 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Thu, 04/09/2026 - 18:19

Submitted by: Anonymous

Submitted values are:

First name:
Claire Donovan

Last name:
Donovan

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
I would like to offer feedback, however, I was unable to attend the open house and cannot find where the byelaw is on your website or Facebook page. Please advise.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Wed 4/22/2026 1:18 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Wed, 04/22/2026 - 13:17

Submitted by: Anonymous

Submitted values are:

First name:
catherine

Last name:
hannon

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
Hello,
My main concern is the way developers are removing our canopy, and are allowed to do so by replacing mature trees, often native species with their surrounding ecosystems and drainage, and replacing them with young trees that do not have the same values or attributes.
I am also concerned that the trees/ecosystems/drainage and watersheds on adjacent properties to development sites are not being adequately protected - think of the proposal by Cameron Contracting next to Brooklyn Creek, for example
More native species should be planted on town properties and more education should be provided to new and old residents about the benefits of planting native species both trees and supporting understories. There should be fall tree planting events and native sapling giveaways, for example.
Less mature canopy, more storm water flooding our properties. This year the Tsolum River banks flooded because of clearcutting on adjacent slopes.
There must be staff to enforce the tree bylaws and educate and advise care and planting of trees and their surrounding ecosystems.
Thanks for taking my comments.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Wed 4/22/2026 12:17 AM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Wed, 04/22/2026 - 00:17

Submitted by: Anonymous

Submitted values are:

First name:
Catherine Salmon

Last name:
Salmon

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
I would appreciate more clarity on the intended purpose of requiring permit for "protected tree" if in most cases any reason will be sufficient to allow removal.

What was the reason behind the decision to change protected trees to mean anything greater than 20cm to the new definition of 30cm?

What native tree species will be protected as significant? What about native shrubs which can grow to considerable sizes and offer habitat, food for birds and pollinators among other ecological services ie Red Flowering Currant, Pacific Ninebark, hedgerows and thickets of Nootka Rose, among others

We know that the ecological value of a tree continues to grow as the tree matures- 1 mature tree provides much more ecological benefit than multiple younger individuals of the same species. Knowing that different species of tree grow at different rates, alongside variable climate factors influences - a 30cm diameter trunk of one species may be a very different age and stage of ecological benefit than the same diameter trunk of another species. As such, will the species, rate of growth and estimated age be considerations as well when determining what qualifies as a protected tree?

Further to this- if any tree over 30 cm is protected, but allowed to be cut for nearly "any reason"- what is the point of designating them protected in the first place?

As such, my concern is that the proposed bylaw does not so much facilitate effective protection for trees based on ecological significance merit, but creates a standardised formula for replacing trees that has the benefit of looking like an improvement or at least a fair trade to a (there used to only be one tree, now look- there are two!) making the loss of the mature tree more easily accepted to the public who may not be fully aware of the value more significant ecological role and benefit of mature specimens.

Outlook

Tree Bylaw Input

From Diane Van Oostdam [redacted]
Date Tue 4/21/2026 9:48 PM
To Parks <parks@comox.ca>

1 attachment (54 KB)
Comments on tree bylaw Apr 21 2026.pdf;

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Diane Van Oostdam
[redacted]
Comox [redacted]

Sent from my iPad

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Wed 4/22/2026 6:40 AM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Wed, 04/22/2026 - 06:40

Submitted by: Anonymous

Submitted values are:

First name:
Dawn Stigant Stigant

Last name:
Stigant

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
I am not clear why there needs to be a bylaw if "For most applications, any reason will be sufficient to allow cutting of a protected tree."

I agree that we need to preserve as many healthy well situated trees. New trees that are being planted need to be better thought out on where they are planted, what they can do to the surrounding area and how big they grow. For an example ornamental cherry trees were planted in our neighborhood and quite a few have damaged concrete, pipes and sprout tons of mini cherry trees all over our front lawns. Several have been removed. Another example is someone planted 5-6 trees in their backyard and 15 years later the new owners cut them all down because there was way too many and some were planted way to close to each other.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Fri 4/10/2026 2:52 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Fri, 04/10/2026 - 14:52

Submitted by: Anonymous

Submitted values are:

First name:
Erica

Last name:
Veglio

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
I appreciate the Town of Comox taking the initiative to update this bylaw, it's an important piece of how we manage growth in our community.

That said, I have a significant concern with the wording on page 4 of the informational document, which states that for most applications, "any reason will be sufficient to allow cutting of a protected tree." That line really undermines the entire idea of what a "protected" tree is. If a protected tree can be removed for essentially any reason, it raises a pretty simple question: what exactly is being protected?

If the intent is that removal is acceptable as long as the tree is replaced, then we should be honest about the trade-off. A newly planted, small replacement tree is not equivalent, environmentally or functionally, to a mature, healthy tree that may have taken decades to grow.

I'd like to suggest a stronger, more meaningful approach to tree protection and canopy growth in Comox. Other cities like Toronto and Vancouver have taken steps in this direction by requiring at least one tree per property (properties which are significantly smaller in size), which has resulted in well-established, tree-lined streets and long-term canopy stability.

The benefits of that kind of approach are pretty clear:

-Trees provide shade and cooling, which matters more every year as summers get hotter. That cooling effect also reduces the need for air conditioning.
-A healthy canopy helps conserve water by reducing evaporation and keeping soil conditions more stable during dry periods.
-Trees improve both air and water quality by filtering pollutants and reducing stormwater runoff.
-And just as importantly, they make neighborhoods more livable, increasing property values and contributing to overall well-being.

A practical step forward would be to require every property in Comox to maintain at least one tree capable of reaching a size that would qualify for protected status. That creates a baseline expectation and helps ensure we're building toward a long-term, resilient urban canopy.

It's also worth noting that the current definition of a "protected tree" (a diameter of 30 cm) already represents a fairly significant tree. On my own quarter-acre property, I have 19 trees (more if you count lilacs and decoratives like peonies), and only one would qualify under that definition. Meanwhile, I have a blue spruce that's taller than my two-story house that wouldn't qualify, even though it clearly provides substantial ecological and aesthetic value. That suggests the criteria may need a closer look.

Recent examples like the clear-cutting at 1000 Pritchard Road and the development around Aspen and Hector Roads show what happens when protection isn't strong enough. The scale and speed of tree removal in those cases have real impacts, not just visually, but ecologically - displacing deer, bears, birds, and other wildlife that rely on those areas.

I would strongly encourage the Town to revisit this bylaw so that "protected" truly means protected, and to consider adding a requirement like one tree per property. That kind of direction would go a long way toward maintaining and rebuilding the tree canopy that makes Comox what it is.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Thu 4/9/2026 3:41 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Thu, 04/09/2026 - 15:41

Submitted by: Anonymous

Submitted values are:

First name:
Gillian

Last name:
Anderson

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
Concerned about the 'any reason' for removal of trees. What actual protection will be in place for important trees, particularly native trees such as Gary Oak, Douglas Fir, Cedar, etc.? What will prevent the removal or damage - topping, inappropriate pruning, etc. - of such trees by developers or homeowners, as we saw years ago in the debacle of severe damage to a grove of ecologically important Gary Oaks? As pointed out in a Letter to the Editor, "Garry oaks have a 75 percent mortality rate. Someone who damages one tree should replant four. " (https://decafnation.ca/2016/12/11/readers-write-about-garry-oaks/).

1:1 is completely inadequate for replacement. Given that climate change is rapidly heating cities and stressing trees, the removal of a large tree, to be replaced by a small sapling of a few years, is insufficient. That ratio should be at least 3:1(and preferably 4:1 for important trees). I would like to see Comox buying up lots and acreages and allowing the replacement trees to be planted there, rather than on private properties where they will be a problem if they get too large. Such community areas would then become urban parks, wildlife corridors and habitat, where the trees could reach full size without problems. Such areas could also be valuable carbon credits in future (https://grist.org/article/carbon-offsets-for-urban-trees-are-on-the-horizon/?utm_medium=email&utm_source=newsletter&utm_campaign=beacon).

Other replacement plantings could be on other city and school district properties, hospitals, etc. Tree

removal fees could be used for such land purchases - if tree removal fees are now going into general revenue, that should be amended to require they fund only ecological conservation.

All developments of any size should be required to maintain a strip of greenery for wildlife corridors and urban bird nestings. Developers should be required to deed to conservation any significant tree stands, as well as a buffer zone that would protect them from water table changes, etc. Where developers are required to leave treed areas, they should be required to post a bond to pay an arborist to maintain the long-term health of trees left in a development setback. Because trees may take years to show damage from injury during construction, changes in groundwater levels or a new vulnerability to wind, it may be better to replant or conserve elsewhere, after an effort has been made to save any particularly magnificent trees. For example, according to the public file, on the Crown Isle Thrifty Foods lot, the 32 trees that were to be retained became vulnerable to blow-down when the other 622 trees were logged, leading to their removal at B.C. Hydro's request; but their fate had probably already been sealed. Requirements laid out in the tree-clearing permit - for the protection of their roots in a Root Protection Zone (RPZ) and maintenance of the surrounding natural grade and drainage - were apparently ignored when an excavator crushed and ripped roots in the RPZ, and drainage and grade changes near the trees were planned. Retention of a smaller grove not vulnerable to blow down was declined to level the transition grade between road and site, with the stated expectation of significant tree replacements and possible Hydro planting funds. Not sure if that mitigation ever materialized.

Finally, careful thought should be given to saving and planting trees along walkways and cycle paths, and near bus stops. People will be more inclined to use them in intense temperatures. Walking a shady street as opposed to walking a blistering pavement is markedly different.

Comox's motto must be "Cool cities save trees!"

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Tue 4/21/2026 3:56 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Tue, 04/21/2026 - 15:56

Submitted by: Anonymous

Submitted values are:

First name:
Gail

Last name:
Challoner

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
While I am in favour of a bylaw that would limit the height of trees to ensure the safety of people and buildings in urban areas, I feel that the proposed bylaw is an invasion of privacy and an infringement of my right to enjoy my property as I wish. To ask permission to remove a tree on my property and the expense of having an expert give their approval is interference. I believe that people, on the whole, would contract a company that fells trees rather than take on that task themselves, without being policed by applications to do so.
While advice is always welcome, being told what I am allowed to plant is, I feel, also an interference with my rights as a homeowner. Can we next expect a bylaw to tell us what colour we can paint our front door?

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Tue 4/21/2026 8:41 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Tue, 04/21/2026 - 20:41

Submitted by: Anonymous

Submitted values are:

First name:
Irene Dworschak

Last name:
Dworschak

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
I truly do believe that having a mature tree canopy, especially in urban areas, provides not only esthetic benefits but also, according to many studies, can mitigate implications of climate change. Studies have shown that trees not only help defend from soil erosion but can also protect water tables and lower ambient temperatures. In this time of warmer, drier summers, trees provide welcome relief with shade as well as encouraging birds and insects. I would argue that clearcutting forests when developers are preparing to build, although easier, should not be allowed. Planting young trees does not replace the mature trees that are removed. A case in point is what has been done with much of Crown Isle. Or in the new development on Hector Rd. I was saddened to see how much has been lost.
https://treecanada.ca/urban-forestry-guide/benefits-of-urban-forests/
https://treecanada.ca/urban-forestry-guide/

Comox prides itself on being an attractive place to live. I think it should also take the lead to provide protection to what makes it so special.

Outlook

Tree bylaw feedback

From Joanne McKechnie [redacted]
Date Thu 4/16/2026 4:59 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Here are my reasons advocating for a strong, improved tree bylaw in Comox as we need a **Tree Protection Bylaw**, not a **Tree Permitting Bylaw**:

1) Trees, both on public & private property, need to be recognized as our community's natural assets to mitigate flooding, droughts and other damage due to climate change. They are our free Green infrastructure both now and for the future.
2) Hire at least an additional part-time bylaw officer to educate and enforce the tree bylaw. Many people cut their trees because they regard them as a nuisance, or because the owner is too old to look after them. With education and offering alternatives, the senseless loss of trees could be avoided.
3) All 20cm and larger trees should be protected as per the consultant's recommendation in the UFMS. There are a large number of 20cm DBH trees, not as many 30+ cm DBH. It makes sense to keep track of the 20 cm DBH trees by requiring permits to cut, to protect as many as possible. They are our future mature trees to maintain & improve our tree canopy coverage.
4) Development approvals need to demand "tree-first designs" from developers. Developers should not have the right to clearcut for convenience as trees are our community's natural assets, affecting everyone, including habitat, by their loss.
5) Protect our "significant trees" – such as large trees, bird trees, wildlife corridors, and species (such as Garry Oak, Arbutus, Big leaf Maple, Doug Fir etc.)
6) Define ratio replacements as a mature canopy takes years to replace. A 1:1 replacement is a net loss for cooling and drainage.
7) I support all the data reported on the info boards that were presented at the Open House, which I believe come from UFMS findings. However, #3 of "Confirmed Directions" is a ridiculous oxymoron to all the other reported findings presented. This "confirmed direction" basically nullifies all the recommendations/reasons for protecting our community's natural assets.
8) All the Councillors should be mandated to more thoroughly read through the UFMS documents before voting on the upcoming tree bylaw draft.
9) Check out Trees and Urban Heat Island (UHI) - Tree Canada for further reasons as to why instituting a strong tree bylaw is important in our community.

Thank you for including my feedback.
Sincerely
Joanne McKechnie
[redacted]
Comox
[redacted]

Outlook

Tree bylaw - improvements needed

From Jay Van Oostdam [redacted]
Date Tue 4/21/2026 3:32 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Dear Sir or Ms,

Thank you for the opportunity to provide feedback on the proposed Tree bylaw. I attended the Open house and left comments. I am glad that we have a draft tree bylaw that includes private property.

I am concerned after looking at your nicely done posters that you are not serious about protecting trees. We must retain and actually increase the tree canopy of Comox. Save all or as many as possible of the groves of big trees. This has many positive environmental benefits; water runoff, shade, wildlife space and sequestration of carbon. Let's do something to protect them.

Many other cities require a permit to remove trees greater than 20 cm DBH. We should adopt this.

I oppose your statement "Any reason will be sufficient to allow cutting of a protected tree." Solid reasons need to be given by a certified arborist such as diseased tree or risk to public safety. Arborist services for homeowners should be provided by the town of Comox.

I feel the town of Comox should also consider "giving a tax rebate for any home with mature trees. This will be a positive contribution to address the climate crisis and will show that Comox residents are truly concerned about the climate crisis and are willing to pay to address it!!

Sincerely

Jay Van Oostdam
[redacted]
Comox BC

Outlook

Proposed Tree Bylaw Feedback

From LOUISE BUNDSCHUH [redacted]
Date Wed 4/22/2026 9:54 AM
To Parks <parks@comox.ca>
Cc Planning Dept <Planning@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

To all Town of Comox council members:

I strongly support prioritizing tree protection in the proposed bylaw amendment. Mature trees are essential to community health, biodiversity, and climate resilience, and they should not be sacrificed for short-term development gains. Developers are fully capable of designing projects that integrate existing trees rather than resorting to clearcutting, and this should be an expectation, not an exception. Likewise, homeowners should be required to obtain approval before removing significant trees to ensure thoughtful, consistent stewardship across the community. I am particularly concerned that allowing the cutting of a protected tree for virtually "any reason" undermines the intent of protection and creates a loophole that could lead to unnecessary loss of mature trees. Clear, strict criteria are needed so that protected status has real meaning. Protecting trees now is an investment in the long-term livability and environmental integrity of Comox.

Louise Bundschuh (resident of Comox since 1987)
[redacted]
Comox, BC
[redacted]

Outlook

Tree Bylaw1125

From Maureen <[redacted]
Date Tue 4/21/2026 9:34 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

To Mayor,Council and Parks Staff,
I am writing this letter about the new Tree Bylaws with the sincere request that the Bylaws will strongly protect the urban forest and "significant" trees in Comox. Since more than half of Comox's tree canopy is on private property, I would like see trees with a DBH > 20 cm protected, not 30 cm. This would protect more trees.
The canopy is so important to the well being of our town. I urge you to treat the trees as an extremely valuable asset. Trees cool our neighbourhoods, regulate storm water, reduce air pollution sequester carbon and have a positive effect on people's mental health. It just does not make any sense to not protect our urban trees.
In the UFMS Phase Two+ Tree Bylaw Findings it is stated 87% of respondents support REGULATING tree removal. What does REGULATING really mean? That a tree could still be cut down? I would like to see PROTECTION not REGULATION.
I support and call for "Tree First Design" in regards to development.
With a strong Tree Bylaw in place I also support hiring at least another parks bylaw officer or arborist to implement the new laws, and assist homeowners with tree advice.
This planet and its' biosphere is a closed system, a tree cut down here affects the entire planet and the air everyone breathes. I urge you to think outside the box of just our little Town and realize just one big tree gone contributes to the Climate Crisis.
Maureen Denny
[redacted]
Comox
[redacted]

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Tue 4/21/2026 3:35 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Tue, 04/21/2026 - 15:35

Submitted by: Anonymous

Submitted values are:

First name:
MEL

Last name:
Mclachlan

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
Some people see trees as a nuisance or an impediment to their personal wealth and because sharing and caring people see trees as a part of our community enhancing the quality of our brief time on Earth, we have and need tree bylaws to protect them. It is incumbent upon all of us to respect the people who will be here after we have expired by considering the consequences of our actions today by crafting a tree bylaw which recognizes the real value trees give to our lives.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Wed 4/22/2026 10:54 AM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Wed, 04/22/2026 - 10:54

Submitted by: Anonymous

Submitted values are:

First name:
Michelle Koning

Last name:
Koning

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
Hazard trees deemed as such by an arborist should not require a permit for removal. That seems an unnecessary burden to private citizens.

Consider a replacement ratio based on the DBH of removed trees for public lands. For private lands tree replacement requirements should/could be more subjective. If hazard trees are being removed they could be replaced 1:1. If trees are being removed for aesthetic purposes they should require a higher replacement ratio. Tree could be planted on public lands instead of private or as suggested money be paid into a "tree replacement bank" used by the city for planting trees on public/park lands. Consider having replacement species be shrubs as opposed to trees.

On public lands tree replacement should be mandatory but location for the replacements open to consideration.

For development, when trees are removed then tree should be replaced on both the private lands as feasible and then remaining balance planted on public lands (replacement ratio 2:1 at minimum) replacements trees species should be carefully considered to allow for most success. Timing of tree planting should also be carefully considered or a guarantee for replacement tree success.

Outlook

Tree Bylaw Feedback

From Mary Whyte [redacted]
Date Tue 4/21/2026 2:34 PM
To Parks <parks@comox.ca>
Cc council <council@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Greetings,

As your own Urban Forest Management Strategy states, trees are a vital part of a thriving town. It is a fantastic strategy. Unfortunately, the proposed bylaw is not.

' Sequesters 1,200
tonnes of **CO**
equivalent;$_2$
• Filters 38,000 kilograms
of **air pollutants;** and
• Avoids 122 million
litres of **stormwater**
runoff'

Trees have many benefits. We need more trees, not fewer. I'm looking at YOUR documentation for support, and it's all there. The Tree Protection Bylaw should reflect what is in your Urban Forest Management Strategy.

Your document states 'the Town is reviewing the bylaw to better align with current best practices, while also responding to community priorities'.

The proposed bylaw is not best practice and does not respond to community priorities.

The community wants protection, not permission to cut. I asked a person coming out of the Tree Bylaw Open House what he learned. His answer was, "to buy my wife a chainsaw"! This is how the weak bylaw language is viewed.

Again, from your document: 'More than half of Comox's tree canopy is on private property, making how trees are managed on private land significant for the future of the urban forest.' You are not going to be able to increase the tree canopy - your own goal - if this bylaw is not strengthened.

- Tree Protection Bylaw Feedback: The bylaw should be changed from a “permission to cut” to a “requirement to protect” approach.

- Specific Bylaw Changes: Lower the tree removal permit diameter to 20cm, implement a higher tree replacement ratio (2:1 or 3:1), and enforce stricter regulations for developers.
- Overall Goal: Increase tree canopy cover in Comox to 86% as requested by the public.

- Bylaw Enforcement: Many people attending the Open House voiced the need for bylaw enforcement for tree protection.
- Homeowner Assistance: Assisting homeowners with tree care, potentially through an arborist, could be a positive aspect of bylaw enforcement.
- Tree Bylaw Importance: A robust and courageous Tree Bylaw is needed to fulfil the direction of the Urban Forest Management Strategy.

Please protect and strengthen the vital and important tree canopy of Comox.

Regards,
--
Mary Whyte
[redacted]
Comox, BC [redacted]

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Mon 4/20/2026 12:33 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Mon, 04/20/2026 - 12:33

Submitted by: Anonymous

Submitted values are:

First name:
Nicole

Last name:
Gavac

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
The bylaw is pretty narrow in scope to protect large trees (75+m dbh) - how many trees would even be protected?
A bylaw is only one piece of the puzzle. Comox could do MUCH better to also have a tree planting strategy on public lands, along roadways and incentives for more tree planting on private properties (ie don't penalize those w lots of trees on their properties by restricting garden refuse amounts in the fall).

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Wed 4/22/2026 12:57 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Wed, 04/22/2026 - 12:57

Submitted by: Anonymous

Submitted values are:

First name:
Neil

Last name:
Ladell

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
The proposed bylaw is insufficient to protect trees in Comox. It must be updated to ensure that all native and other trees (on public and private lands) with ecosystem and benefits to mitigate climate change impacts (urban heat island amplification) with a trunk diameter greater than or equal to 8 inches are protected. Removal should require permit, account for cumulative effects, public consultation, and a equivalent replacement. With an average 1% removal of our company per year, Comic's new bylaw needs to do more to halt and reverse this trend to ensure climate resilience and community values.

Outlook

TreeRequest Other on 2026-04-09

From gis tech [redacted]
Date Thu 4/9/2026 9:44 AM
To Robbie Nall <RNall@comox.ca>
Cc Kirsten Edwards <kedwards@comox.ca>; Dany Fortin <dfortin@comox.ca>; Town of Comox - Public Works <publicworks@comox.ca>

This is a TreeRequest notification

for Other

Town Tree Bylaw - see webform submission below...

Submitted on Thu, 04/09/2026 - 09:26 Submitted by: Anonymous Submitted values are: First name: Neale Last name: Mullen Email: [redacted] Please provide your feedback on the proposed tree bylaw. I feel that the town has no right to dictate what i do with my privately owned trees. If its important to the town, plant your own forest. my house and property is my decision. not yours

Requested by Public

Description: Other

Resident Contact Information (if applicable):

Neale Mullen
[redacted]

If the task has already been assigned, their name will appear here: RNall_comox

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Sun 4/19/2026 5:50 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Sun, 04/19/2026 - 17:49

Submitted by: Anonymous

Submitted values are:

First name:
Nancy Van Veen

Last name:
Van Veen

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
I firmly believe our Comox trees need to be protected. This is important for combating climate change, protecting animal habitat and stability in regard to slides, flooding and heat domes. Council should be prudent.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Tue 4/14/2026 4:03 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Tue, 04/14/2026 - 16:03

Submitted by: Anonymous

Submitted values are:

First name:
Peter

Last name:
Boivin

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
Thank you for the opportunity to provide some feedback on this proposal. First, I do not think 245 responses is really a significant number when it comes to the population of Comox. So when somebody looks at your proposal page and the high percentages of people in favour and how it is presented, I think that is very misleading. Second, I have concerns about any form of government that wants to add one more thing to their list of what homeowners can or cannot do on their on private property. Most home owners are not going around chopping down trees for the sake of chopping down trees. I think if a home owner would like a tree removed because it is diseased, poses some type of danger, or simply because they want to change the landscape of the yard, they should be free to do so without a cost and a process involving any government. Thank you.

Outlook

Comox Tree By-Law

From Pat Carl <pat.carl0808@gmail.com>
Date Mon 4/20/2026 8:27 AM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

I attended the open house at d'Esterre regarding the tree by-law under consideration by the Town.

I was appalled at how little regard our Councillors seem to have regarding their roles in formulating the tree by-law, as only two (Kerr and Meillieru) showed up to discuss the pending by-law. I vote and I will not forget the message of disdain the other four sent to attendees at d'Esterre by not not making themselves available for the open house.

I also noted that an individual property owner or developer could cut down a tree "for any reason," which, to me, signals that the by-law will serve the will of developers rather than protecting our beautiful Comx. Again I vote and I will not forget.

While four members of this Council voted against the wishes of many of us Comox voters regarding the height of buildings in Comox, I still hope that at least one of those four will step up to protect our trees for the good of the people and the good of the Town.

Pat Carl
[redacted]
Como[redacted]
[redacted]

With gratitude, I acknowledge that this land on which I reside is the unceded traditional territory of the Pentlatch, Eiksan (E'y7ikʷ7sen), Sahtloot, Susitla, Cha'chae, Tat'poos and K'omoks Peoples. Taking their lead, I walk through my life conscious of Mother Earth. I respect her and all her gifts. I thank these First Peoples for their example, generosity and hospitality.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Fri 4/10/2026 5:41 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Fri, 04/10/2026 - 17:41

Submitted by: Anonymous

Submitted values are:

First name:
Roz

Last name:
MacLean

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
I think that in riparian zones where the DFO has criteria and consequences the town should inform residents and require that the process has occurred (getting permission from DFO) before moving forward with tree removal. There may need to be more bylaw enforcement and officers with growing development. If arborist companies do not follow bylaws (this has happened near us with multiple instances of rule breaking by the same company) then there should be some sort of consequence like suspension of business license in town.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Tue 4/21/2026 11:38 AM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Tue, 04/21/2026 - 11:38

Submitted by: Anonymous

Submitted values are:

First name:
Sherry

Last name:
MacLeod

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
I take the view that there should be identified criteria for cutting a protected tree. Currently the information provided suggests that "For most applications, any reason will be sufficient to allow cutting of a protected tree". How is the tree protected, if "any reason" is sufficient for cutting? If a tree is truly protected, there should be specific criteria that must be met before the tree can be cut.

Outlook

protect our trees

From treebee@shaw.ca[redacted]
Date Mon 4/20/2026 12:49 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

I want better protection for the current trees we have by changing the bylaw to the suggested changes of "requirement to protect"

Warm Regards,

Theresa Brulotte, RTC
Registered Theraputic Counsellor
In service of embodied integration, enhancing your Balanced way of Being.

[redacted]

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Mon 4/20/2026 12:47 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Mon, 04/20/2026 - 12:47

Submitted by: Anonymous

Submitted values are:

First name:
Theresa

Last name:
Brulotte

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
I Want more protection for the trees. I support a new bylaw, "requirement to protect", not cut down.

Outlook

Webform submission from: Proposed Tree Bylaw Open House and Feedback > Content rows

From Town of Comox <no-reply@web-response.com>
Date Sun 4/19/2026 9:47 PM
To Parks <parks@comox.ca>

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Submitted on Sun, 04/19/2026 - 21:47

Submitted by: Anonymous

Submitted values are:

First name:
TRISH

Last name:
FENNELL

Email:
[redacted]

Please provide your feedback on the proposed tree bylaw.
Thank you for your commitment to protecting our trees. To truly safeguard these environments, we must prohibit clearing during the spring and ensure tree companies are strictly monitored. These teams must conduct thorough inspections for all wildlife, including nesting birds and essential insect populations.
Trees are not merely obstacles to housing developments; they are entire ecosystems unto themselves. While many overlook this reality—as evidenced by the current state of our world—we must be the ones who care and take action to protect them

Outlook

Feedback - Tree Bylaw Open House, from SCUF

From Yvette Crane [redacted]
Date Mon 4/20/2026 6:16 AM
To Parks <parks@comox.ca>
Cc [redacted]

1 attachment (19 KB)
SCUF Response to Tree Bylaw_fnl.docx;

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Hello,
Thank you for this opportunity to provide feedback to the Open House on Comox's new proposed Tree Bylaw. (Attached)

Please note I am away until May 13th so ask that you 'reply all' so that our group received your reply, thank you.

In addition, we had some questions:
1) When might we be able to view a draft copy of the bylaw wording?

2) Could we please ask to be informed, as early as possible, with the date that the Draft Tree Bylaw will be presented to Council?
(We plan to prepare a delegation presentation for the Council when that is presented. To do so, we need to know early enough to submit that delegation request in time. Thank you.)

3) Are we able to see the "Key Directions" report / staff or consultants' report to Council from March 11th that was mentioned at the Open House? (We understood that it was not part of the minutes from the Strategic planning committee March 11 that is available on line?)

Thank you very much for your consideration of our feedback and for the work that has gone into this important project thus far.
Sincerely,
Save Comox's Urban Forest
[redacted]
Comox [redacted]

April 18, 2026

TO: Parks@Comox.ca

RE: Proposed Tree Bylaw Open House - feedback

Thank you for this opportunity to provide feedback on the proposed Tree Bylaw as part of the April 8th Open House.

Our members of Save Comox Urban Forests were in attendance along with over 100 other citizens, many of whom raised grave concerns about the lack of protection this bylaw provides for Comox's trees and tree canopy.

Below are the main points of our feedback. Thank you for considering it as part of your report back to Council.

- It is a positive that there IS a new bylaw, and that all property, including private property, is included. This is a step in the right direction

- However upon reading the bylaw, it sounds very much like a 'permission to cut' bylaw, not the 'requirement to protect' bylaw the people of Comox are looking for

- SCUF, like 86% of citizens, provided feedback earlier in this process requesting INCREASED tree canopy. Save all / as many as possible groves of trees/big trees. This has environmental benefits; is part of Comox's beauty & character; run-off and stormwater benefits, and so many more (all detailed in the UFMS)

Specific changes to the Bylaw we are looking for Council to move and pass:

1) RE: "Require a permit for removal of trees with diameter greater than 30 cm. " – This needs to be changed to 20cm dbh (protects many more trees)
   - 20 cm diameter because that is when a tree begins providing significant ecosystem services.

2) RE: tree replacement ratio requirement. The ratio should be minimum 2:1 - or 3:1 for significant trees. More importantly, need **volume-based replacement** for actual lost leaf area

3) Maintain all Covenant trees. Increase them.
   Protect "significant trees".
   - all trees are an asset and are considered as a part of our urban forest in the UFMS. As such, all trees should have some kind of protection. Yes to prohibitive permits and fines for home owners and developers – will act as a deterrent.

   Let's see a "requirement to protect", not a "permission to cut" Bylaw!

4) Treat developers differently from homeowners.
   - Make Bylaw STRICTER during development. Regulate tree removal during development. Tree retention in development is vital. Implement a "Tree First" design.

5) Increase Town staff resources:
   - Many people attending the Open House voiced the need for bylaw enforcement, which is largely not happening now
   - Assisting home owners (i.e. the Town Arborist) with any 'tree issues' will help keep trees standing
   - Need an arborist to assist home owners to care for trees; this could act as the positive aspect of bylaw enforcement. (Use permit funds to fund these important measures)
   - a helpful arborist would be a friendlier approach to tree protection, free consultations and/or seminars for instance

In conclusion, the Urban Forest Management Strategy is a wonderful well-researched document and Comox needs a robust and courageous Tree Bylaw to fulfil the direction of that Strategy.

SCUF looks forward to your reply and working further with Parks and Council on this project.

Yvette Crane, Joanne McKechnie, Mel McLachlan and Maureen Denny
Leads, Save Comox's Urban Forests

[redacted]
Comox B.C. [redacted]

April 23, 2023

Town of Comox
Mayor and Council

RE: CVFood Policy Council- Comox Tree ByLaw Support

Dear Mayor and Council,

I am writing to you on behalf of the Comox Valley Food Policy Council (CVFPC). The Comox Valley Food Policy Council provides a forum for advocacy and policy development that works towards the creation of a food system that is ecologically sustainable, economically viable and socially just.

The council is writing to express our strong support for a tree by-law that prioritizes the protection and long-term health of Comox's tree canopy. As a Food Policy Council, we recognize that a healthy, resilient environment, which includes a thriving tree canopy, is foundational to our food systems and essential for producing, harvesting, and accessing nutritious food.

We urge the municipality to adopt provisions that ensure strong protection for trees of all sizes. Smaller and younger trees are not expendable—they are the future canopy and play an essential role in climate resilience, soil health, and community well-being. Policies should meaningfully disincentivize unnecessary tree removal and instead encourage preservation wherever possible.

A healthy habitat for both people and wildlife depends on maintaining as many trees as possible today. Trees at every stage of life contribute unique ecological benefits, from carbon sequestration to shade, habitat, and food systems support. This includes not only living trees, but also standing dead trees (where safe) and fallen woody material, which are vital for biodiversity, nutrient cycling, and wildlife habitat.

We also recommend that the by-law include special consideration for native tree species, pollinator-friendly trees, and food-producing trees. These species strengthen local ecosystems, support pollinator populations, and contribute directly to community food security.

We appreciate the opportunity to provide input and encourage the municipality to adopt a forward-looking by-law that reflects the full ecological and social value of trees.

Thank-you for your consideration. Please don't hesitate to reach out with any questions, concerns or requests for clarification.

Sincerely,



Maurita Prato,
Co-chair on behalf of the Comox Valley Food Policy Council,

Town of Comox – Administration

From: Marie [redacted]
Sent: April 8, 2026 2:12 PM
To: council
Cc: council@courtenay.ca; mayor.brown@cumberland.ca; Mark Harrison CVRD
Subject: Tree Protection Bylaw
Attachments: Tree Protection Bylaw.pdf

Warning This E-Mail originated from outside The Town of Comox. *Please open with Caution*

Attached is a submission regarding the future Comox tree bylaw(s). Our contact information is in the document.

Thank you,
Hans and Marie Jacobs

RECEIVED
April 08, 2026
TOWN OF COMOX

LOG: 26-338	REFER:	AGENDA: RCM 22Apr26
FILE: 6300-01	ACTION: MR	

Copies: Council
JW/SA/RN/SR/CD

April 8, 2026

TO: Comox Mayor and Council
RE: Tree Bylaw

On many occasions, we have written to you expressing concern about development in Comox and the need to protect trees. As well as this letter, we request that you review and consider the correspondence of March 28, 2025 (attached) regarding the Urban Forest Management Strategy, which includes relevant material.

When we relocated to the Comox Valley from Ontario, we believed that we were moving to a province and community which valued and protected the natural environment. Instead, we were very disappointed to find that developers are the ones who appear to be valued and protected.

Words from a Joni Mitchell song ("Big Yellow Taxi") come to mind: "They paved paradise and put up a parking lot". In the song, replacing "parking lot" with "human filing cabinet" describes what is happening with new development - buildings devoid of design, identical from community to community, barren of trees, and overshadowing neighbouring buildings.

New developments are devastating our tree canopy. Bylaws must be designed to protect as much of our natural environment and tree canopy as possible. Developers ***CAN*** protect trees. It is just easier and cheaper for them to completely clear sites. For example, one developer of townhouses on Anderton Road retained some mature trees on a small site while the developer next door to that development virtually razed its site.

Accordingly, we need a strong "**Tree Protection Bylaw"** separate from an "Urban Forest Management Strategy". Specifically:

- Set the Bylaw goal as mandating tree ***retention*** – particularly mature tree retention – not just tracking tree removal. As one of their many positive climactic contributions, trees manage storm water and run-off. Losing trees exacerbates the impact of weather events, which are becoming more extreme. Mitigating the effects of and preparing for such events will surely become more complex and costly as the tree canopy shrinks.
- Revise and, where possible, increase development set-back requirements to ensure there is adequate room to retain trees and to reduce the creation of urban heat islands.
- Require a "Trees-first" design for new development that integrates trees into design as opposed to managing their clearing.
- Include additional protection for "Significant trees", which includes large trees, trees favoured by particular bird species, trees in wildlife corridors, and important species (e.g., Garry Oak, Arbutus, Big leaf Maple, Douglas Fir).
- Lower the limit of protected tree diameter from 30 cm diameter to 20 cm as the UFMS (urban forest management strategy) consultant recommended, enabling the town to protect more trees.
- Require retention of as many mature trees as possible – in proposed and existing developments, as well as on town property. New trees take dozens, sometimes hundreds, of years to replicate the huge benefit that mature trees provide. Accordingly, tree replacement must be required and exceed a 1:1 ratio.
- Include provisions to assist homeowners and existing developments maintain and, where possible, increase on-site trees.
- Include development permit withdrawal for serious infractions of the bylaw. Developers must understand that development permits can be withdrawn if they do not comply. Permit removal is the only effective disincentive. Developers cannot be allowed to just say, "Oops, sorry, it was a subcontractor", or pay fines for breaking the rules.
- Engage and deploy adequate staff resources to enforce the Bylaw.

It must be noted that, in many cases, new developments are neither solving housing problems nor providing the type of housing and affordability required. With reduced immigration, outflow of population from BC, severe weather events, and significant economic concerns, we need to completely rethink housing goals, requirements, and needs at both local and provincial levels.

The arguments for almost 100% lot coverage – which is devastating to trees – are invalid. Appropriate and adequate housing can be constructed while still maintaining trees. Comox needs to require tree retention wherever possible. Ensuring the title of the bylaw and its content focus on tree ***protection***, rather than the permitting process for tree removal, is essential. (Obviously, this does not mean that there would not be conditions under which tree removal might be necessary).

A visionary Comox Tree Protection Bylaw could serve as a model for the entire Comox Valley.

Submitted by,

Hans Jacobs BA, MBA
Marie Jacobs BSc, MBA

[redacted]
Courtenay, BC
[redacted]

Encl.
Urban Forest Management Strategy submission; March 28, 2025

March 28, 2025

TO: Comox Mayor and Council
Courtenay Mayor and Council
Cumberland Mayor and Council
Director Comox Valley Regional District

RE: Urban Forest Management Strategy

While a resident of British Columbia for only a few years, I have long thought of the province as the "Amazon of the North", given the importance of its old growth forests and extensive tree canopy to the health of our planet and its occupants. Trees are the literal and environmental anchor of our biosphere. Through the media and personal observation, we are all hearing about and seeing first-hand the alarming loss of trees locally and provincially.

Thank you to Comox's Mayor, Council, and Staff for undertaking a process to preserve and enhance Comox's urban tree canopy. The rationale for this initiative is clearly the importance of trees for the environment and our physical and mental health. This should be, and we hope will be, a project that will expand to include Comox Valley jurisdictions acting jointly to preserve and enhance the urban tree canopies within their boundaries through a single consistent policy.

At the Open House, Comox staff were approachable and friendly and the displays helpful in understanding the initiative and current situation regarding the urban tree canopy level, which unfortunately decreased substantially from 2019 – 2023. The 29% canopy level in 2023 was already shockingly low. Clear-cutting for developments in 2024 and to date in 2025 (e.g., Pritchard, Aspen/Hector, Anderton Road and many other sites in the town) have obviously reduced this level even further.

Future events could provide more opportunity to record community input; for example, by posting chart papers with the heading(s): "To preserve and enhance Comox's urban tree canopy; e.g., Comox should *Stop:* , *Start*: , *Continue*: " and inviting participants to jot down their thoughts. While the survey may potentially reach a larger audience, surveys tend to be more directed and limiting than, for example, facilitated focus groups.

The areas on which we will comment in this submission are:

- **Where are we now?**
- **How did we get here?**
- **What is our goal?**
- **What are the barriers to achieving our goal?**
- **What actions can be taken to reduce or remove the barriers and advance the goal?**
- **Who should be involved and how?**

Survey questions are completed separately and, in some cases, reference this submission.

WHERE ARE WE NOW? Less than 29% tree canopy

HOW DID WE GET HERE? We need to know the past and present in order to change the future

The way we've grown:

Unlike many communities, the Comox Valley seems to have developed without many boulevards between sidewalks and roads. Municipal ownership of boulevards fronting residential properties provided the opportunity for extensive urban tree planting in such communities (and enhanced safety). This resulted in some more urban communities having a more extensive tree canopy than Comox.

Belief that we have endless trees in our province:

When expressing concern about the loss of urban trees, I have heard comments such as, "There are lots of trees out there". But trees are being logged or otherwise lost "out there" as well as in urban areas. Such attitudes surely have led to the loss of trees.

Enabling legislation and bylaws:

Provincial legislation and municipal permissiveness have led to very high lot coverage – indeed zero setback in many cases – in residential development, leaving little to no room for trees.

The argument for more intense development is that more trees will be saved outside the development area. One flaw in this argument is that trees are being lost everywhere. Also, these practices result in concrete-to-concrete urban heat islands which have a very negative effect on the immediate environment and livability. It is worth noting that the Co-op building on Guthrie Road not only has more plantings but also more aesthetic appeal than recent developments (e.g., Urban Corner). Another result is that the town has assumed almost total responsibility for provision of green space, plantings/trees, and facilities (such as a small gathering area or play space) which were features of large older townhouse developments, for example.

We can't change the past, but we can change the future.

WHAT IS OUR GOAL? (see **ACTIONS**)

WHAT ARE THE BARRIERS TO ACHIEVING OUR GOAL?

Apparent lack of places in built-up areas in which to plant trees

As previously mentioned, having permitted extremely high lot coverage along with the lack of boulevards substantially reduces space for tree planting.

Lack of adequate protective legislation/bylaws at the provincial and municipal levels

Apparently, some developers have been allowed to merely apologize and pay fines after they fail to meet the expectations of their permits. Too many have denigrated their surrounding environment and properties; e.g., cutting more trees than required just because it is easier and cheaper to build that way. Important environmental features or wetlands on their sites or adjacent wetlands have been compromised (e.g., by silt) or destroyed, leaving the challenging process and expense of restoration (where possible) to communities (e.g., https://www.timescolonist.com/local-news/langford-creek-damaged-by-development-restored-by-volunteers-9648291). Developers may flaunt their rights, but minimize or ignore their responsibilities, some even seeking additional concessions after approval.

The challenge of tree care for individuals and municipalities:

While desirable for aesthetic, health, and environmental reasons, having trees on one's property can pose challenges. Personal time and ability for tree care (homeowners) along with the cost of tree planting and maintenance (municipalities and property owners) make it easier to do without trees, especially with the high growth rate in this climate. Pruning, disease, pests, extreme weather, dealing with droppings and fallen leaves, and battling invasive species can be difficult for homeowners to contend with.

The new organic collection system in Comox and Courtenay is a heavy burden on homeowners with trees, particularly mature deciduous specimens. At peak times, property owners can accumulate many bags full of leaves and tree droppings, along with other yard waste, which would require several collections to take away. A single large bin is not only inadequate for containing such amounts, but is exceedingly heavy. Because of the addition of kitchen waste, the bags are odoriferous and attract animals. Property owners are left with bags of rotting organics over a number of weeks. Offering a location to drop off 'excess' bags is neither an acceptable or, for many, a feasible alternative to curbside pickup. Those who can't afford a service will either be discouraged from planting trees or, at the extreme, choose to remove one or more from their lot.

Jurisdictional and departmental silos

Jurisdictional and department silos still may be standing in the way of joint action on Comox Valley urban and rural tree canopy and can create frustration for property owners. Valley residents who live literally next door or across the street from each other can face different rules for trees and yard waste collection.

WHAT ACTIONS CAN BE TAKEN TO REDUCE OR REMOVE THE BARRIERS AND ADVANCE THE GOAL?

- The first step is to set a specific goal for preserving and enhancing the urban tree canopy (e.g., % tree canopy desired) which is measurable and achievable, along with a timeline, budget, and strategies for accomplishing the goal.

Regulatory

- Work with other jurisdictions to lobby the provincial government to return local control of development and enhance tree protection.
- Create new bylaws which provide greater protection for trees on private property
- Require boulevards in new neighbourhoods and large development areas
- Reset maximum lot coverage requirements to reflect the need for tree cover and require adequate setbacks to accommodate trees and/or a significant number of shrubs.
- Increase monitoring to confirm that environmental requirements, including tree preservation, have been adhered to by developers.
- Withdraw permits from developers who break their environmental covenants. Ensure developers are aware that this will be the outcome, not just financial penalties.
- Ensure developers pay for remediation of environmental features their project damages on their own and adjacent sites.
- Enshrine current urban boundaries to minimize land speculation and help preserve environmental features and rural trees.

ACTIONS (continued)

Tree planting and care

- Create an up-to-date tree inventory
- Plant trees on the road allowance of private properties and available public spaces. Care for these trees.

- Encourage (or in the case of new developments, require) planting of native species
- Remove invasive plants from roadsides and public areas
- Purchase strategic pieces of land to provide additional tree canopy

Support for Property Owners

- Schedule additional organic collections during peak times of year.
- Provide incentives for farmers, rural residents, and all urban households with sufficient property to plant trees (e.g., through taxes, provision of trees, recommended species).
- Offer support for insect or disease management for trees on private property
- Where sufficient space for tree planting is not possible, encourage planting of and provide advice on the types of shrubs and plantings which constitute the 'next best thing'

WHO SHOULD BE INVOLVED AND HOW?

This should be a whole community effort

- Change the name of the initiative from "Urban Forest Management Strategy" to better reflect the goal and remove the potentially negative connotation of "Management".
- Create a task force from staff, Council, and community to co-ordinate the initiative
- Mount a communication campaign to engage and inform the community; i.e., to raise awareness of the important roles trees play and how homeowners can help advance the preservation and increase of the tree canopy.
- Involve community groups, conservation groups, homeowners, and businesses in the effort to preserve and enhance the tree canopy.
- Work with other Valley jurisdictions to implement consistent rules and regulations regarding tree removal in urban areas.
- Liase with and seek support and funding from provincial and federal Environment Ministries
- Recognize developers who retain more green space and trees on their sites than the minimum required.
- Recognize individuals and groups who have made significant contributions to the advancement of the tree canopy

Marie Jacobs

[redacted]
Courtenay, BC
[redacted]



TREE PROTECTION BYLAW UPDATE

May 2026

COUNCIL PRESENTATION

TOWN OF COMOX

AGENDA

1. Project Overview
2. Engagement Highlights
3. Proposed Bylaw
4. Implementation Considerations

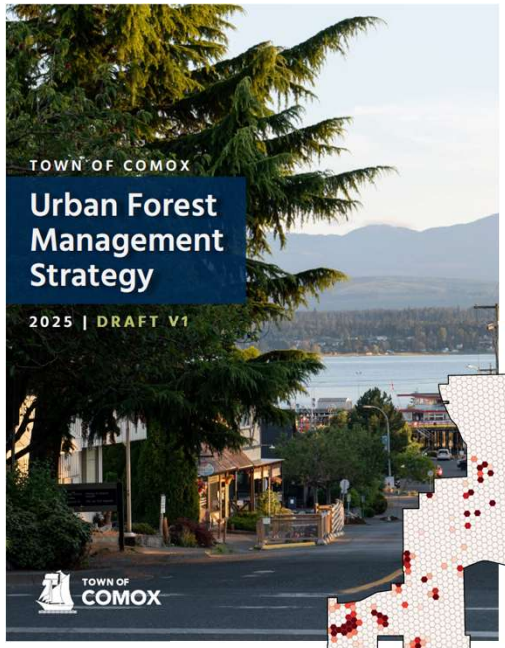


1. Project Overview

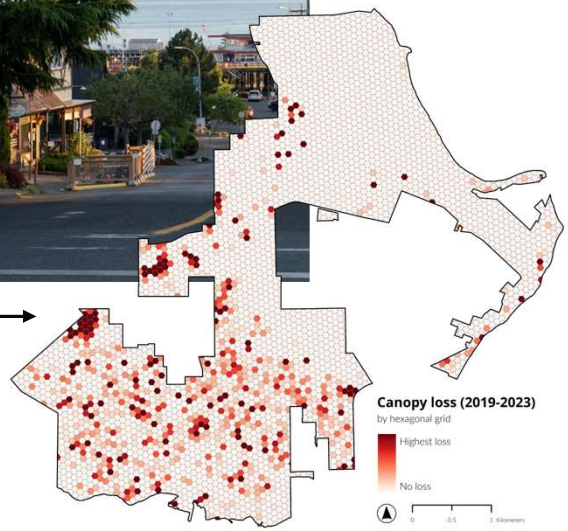
CONTEXT

Implementing the Urban Forest Management Strategy up for Council adoption in early 2026:

Provides a 30-year vision and strategic framework for planning, protection, growth, and management of the urban forest



27 hectares of canopy loss (-2%) in the past 6 years



- **Recommends updating the Tree Bylaw to grow Comox's urban forest.**

POLICY CONTEXT:
RELEVANT ACTIONS FROM THE UFMS

Action	Priority	Timeline	Cost
7a. Replace the current Tree Management and Protection Bylaw with a new bylaw to apply to all trees on Town property and a subset of trees on all private properties.	A	Short	$$
7b. Clarify protection requirements for trees subject to a Section 219 covenant under the Land Act.	A	Short	$
7c. Consider establishing, by bylaw, higher levels of oversight for a class of significant trees in Comox.	A	Short	$
7d. Ensure adequate tree protection measures are installed where trees will be retained on or near construction sites or other sites where tree-damaging activities occur, for the duration of the activities.	A	Short	$
7e. Establish a minimum 1:1 replacement ratio when regulated trees are cut or removed, with higher replacement ratios in place for higher-value trees.	A	Short	$
7f. Consider the resourcing and enforcement requirements of a new bylaw during financial planning for the 2026 fiscal year and following years.	A	Short	$$$

CONSIDERATIONS FOR REGULATING TREES

Appropriate level of regulation must consider the desired level of:

- **Urban forest protection**
- **Private property impacts**
- **Implementation resources**

2. Engagement Highlights

What We Heard From The Community

Two Phases:

Phase 1 Nov 19 – Dec 19 (2025)

Online Survey
63 respondents

Phase 2 April 8 - 22 (2026)

In-person open house
110 attendees
In-person focus group
14 attendees
Online feedback form
30 respondents

What We Heard From The Community – Phase 1

How and where the bylaw should apply

71%

Strongly support the bylaw to regulate trees on private property

81%

Strongly support regulating tree cutting associated with development

71%

Strongly support regulating tree cutting associated with other reasons.

What We Heard From The Community – Phase 1

Types of trees that should be regulated

48%

Strongly support applying the bylaw to trees with at least 20cm DBH

61%

Strongly support applying the bylaw to native species at a smaller size

86%

Strongly support applying the bylaw to trees of any size within an environmentally sensitive area

84%

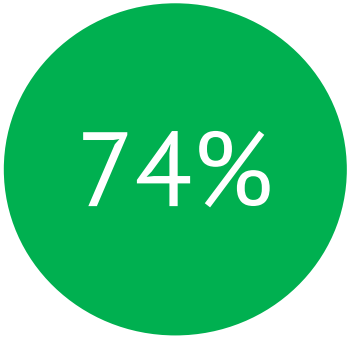
Strongly support including specific measures for important trees that may be very old, rare or culturally/ecologically valuable.

What We Heard From The Community – Phase 1

Objectives for protected trees



Strongly support requiring replacement trees to be planted



Strongly support requiring arborist reports to support tree removal or construction activities



Strongly support incentivizing tree retention, especially for mature trees



Strongly support making exceptions for special circumstances, such as hazard tree removal

TOWN OF COMOX

DIAMOND HEAD

What We Heard From The Community – Phase 1

Q: How should implementation of the bylaw should be resourced?

2.08

Equity / Fairness

Use lower permit fees for those with less ability to pay; may require higher general taxation to avoid other service cuts.

2.04

Cost Recovery

Use higher fees and penalties to fund the bylaw; may shift costs onto owners with many protected trees that benefit the community.

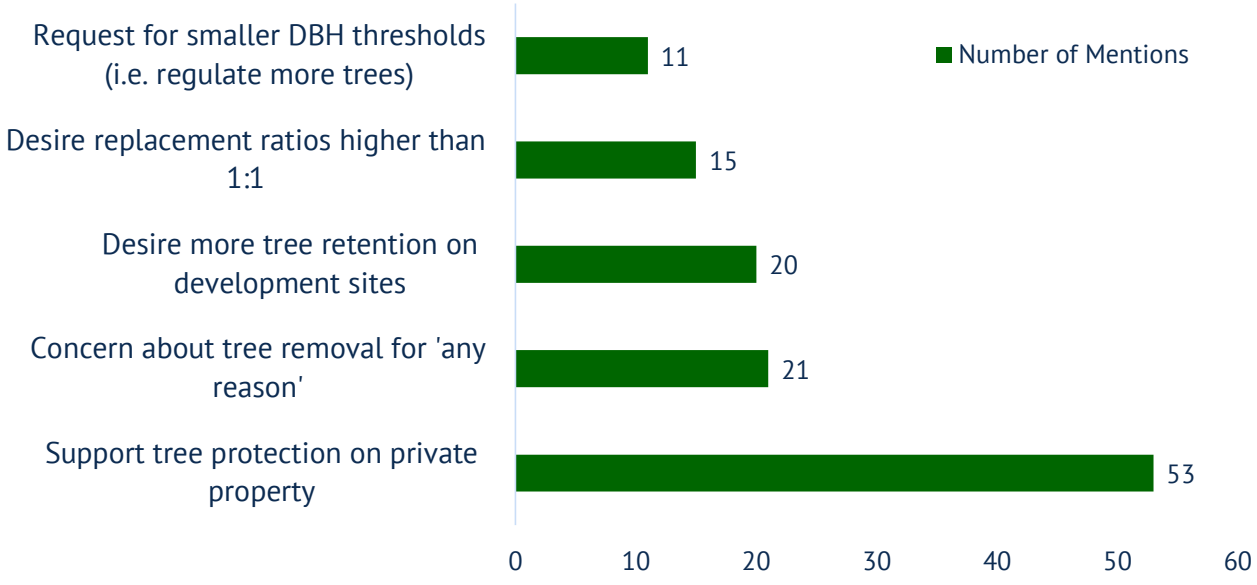
1.75

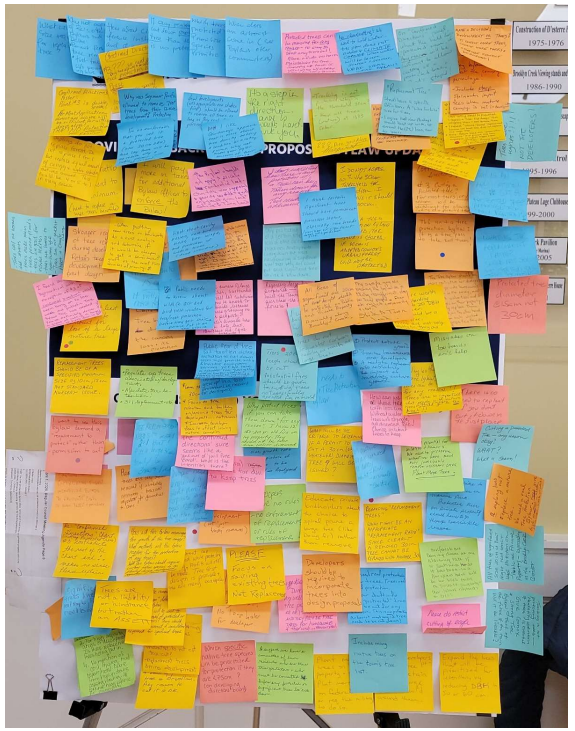
Service Efficiency

Reallocate staff before raising fees or taxes; may reduce other services and affect residents and staff in those areas.

What We Heard From The Community – Phase 2

In-Person Open House



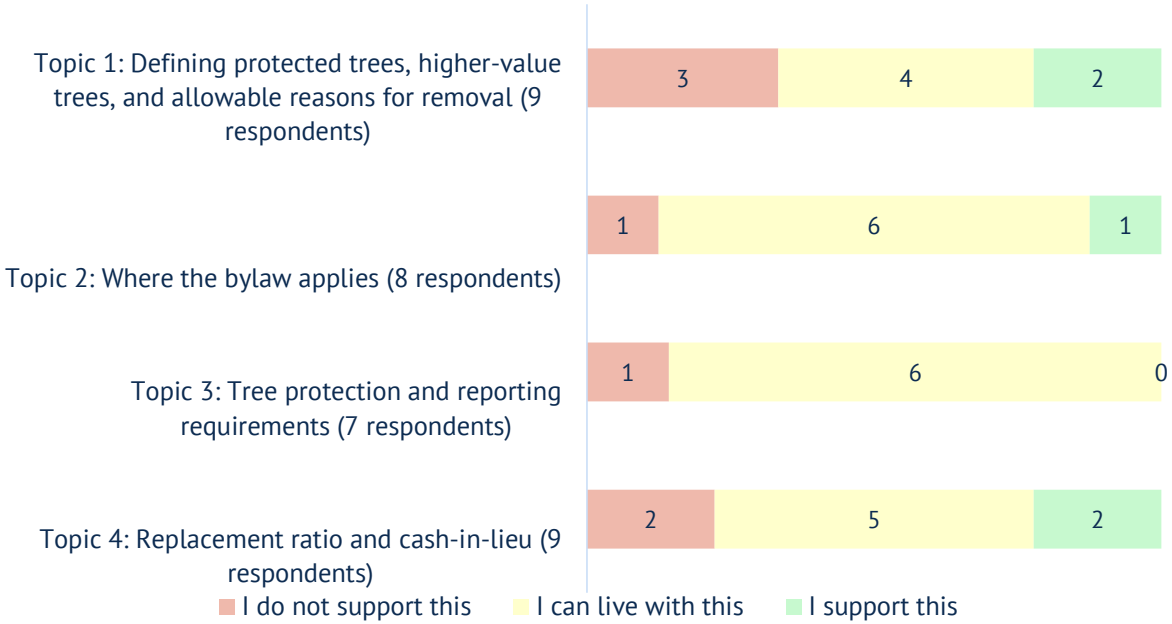


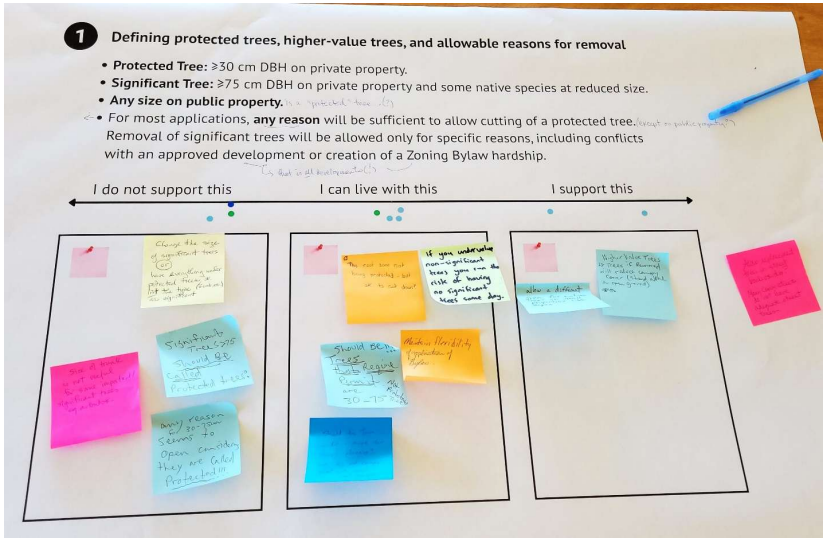
TOWN OF COMOX

DIAMOND HEAD

What We Heard From The Community – Phase 2

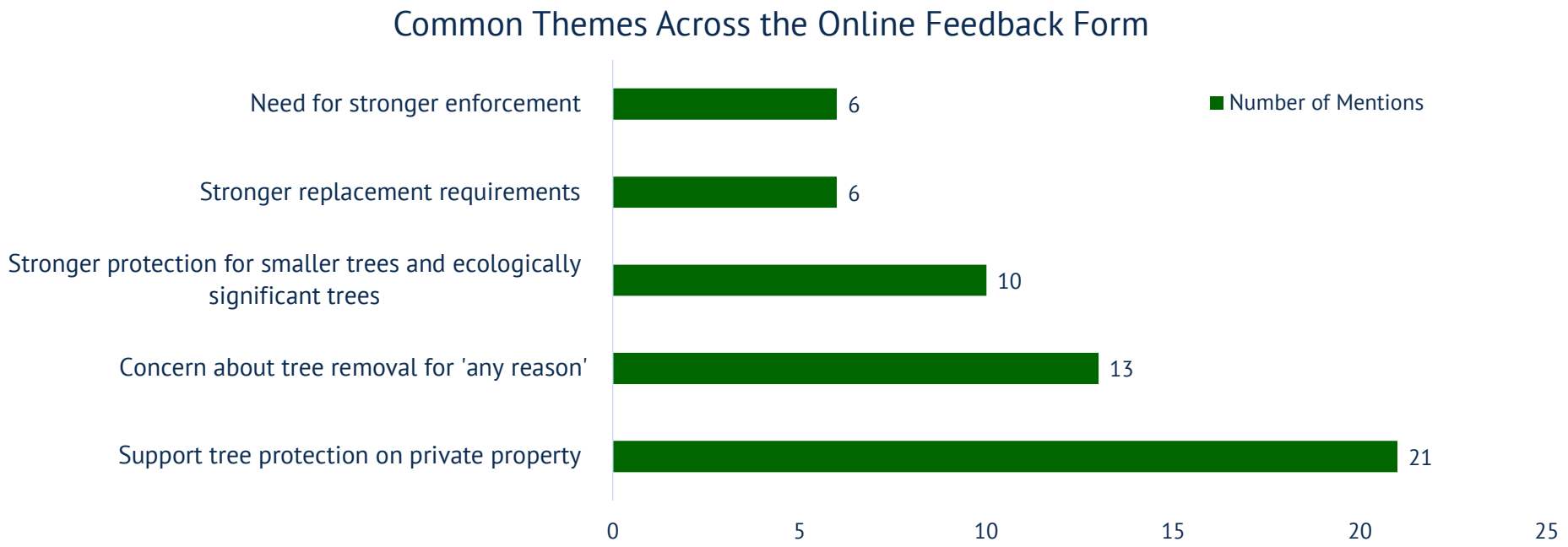
Focus Group Workshop (14 attendants)





What We Heard From The Community – Phase 2

Online Feedback Form



3. Proposed Bylaw

Previously Discussed: March 11

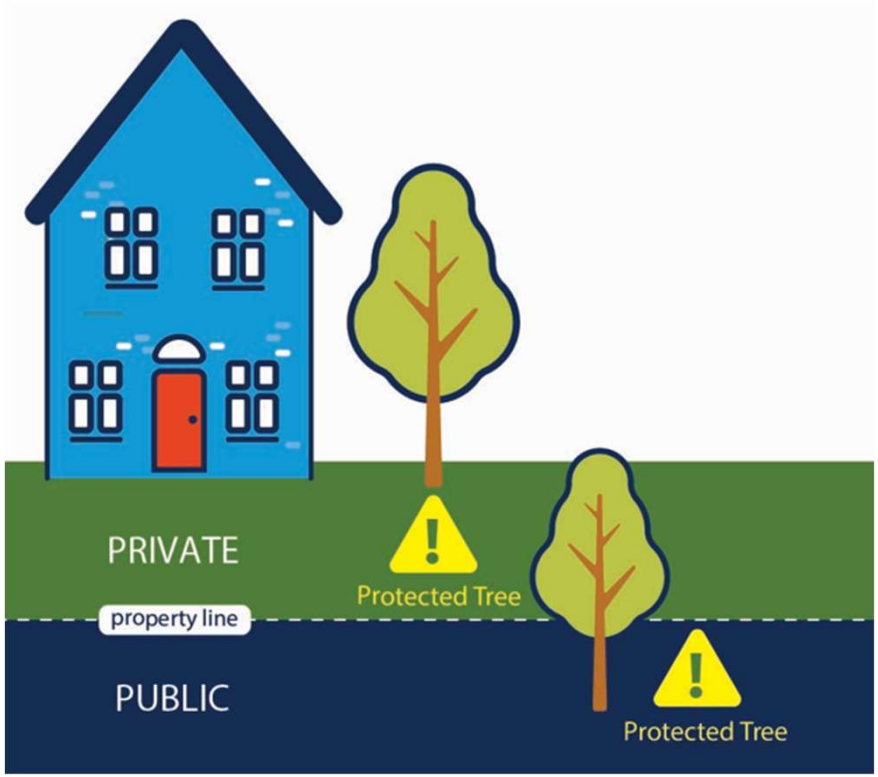
Topic	Council Input
Size of Regulated Trees (DBH)	30 cm and larger, with staff to report back on criteria for regulating classes of high value tree.
Where the Bylaw Applies	Bylaw will apply to all properties in Comox.
Reasons A Permit Can be Issued	In general, regulated trees can be removed for any reason while higher value trees may have "additional protections".
Tree Replacement	A replacement ratio is supported, with staff to report back on a suggested ratio.

Recap of Confirmed Directions

- Topic 1 – **Where the Bylaw Applies**
- Topic 2 – **Regulated Trees**
- Topic 3 – **Cutting Regulated and Protected Trees**
- Topic 4 – **Tree Replacement**

1 – Where the Bylaw Applies

- The Bylaw applies to all properties; both City-owned and privately-owned.
- **A permit will be required for cutting of a Regulated Tree.**
- Regular maintenance that aligns with arboricultural best practices does not require a permit.



2 – Regulated Trees and Protected Trees

A Regulated Tree is:

A "**Priority Species**" tree with a **DBH ≥20 cm**



OR

A tree **other than a Priority Species** with a **DBH ≥30 cm**



OR

A "**Protected Tree**"



2 – Regulated and Protected Trees

What is a Priority Species?

'Priority Species' include the following species:

- Douglas-fir (*Pseudotsuga menziesii*)
- Western redcedar (*Thuja plicata*)
- Western hemlock (*Tsuga heterophylla*)
- Grand fir (*Abies grandis*)
- Sitka spruce (*Picea sitchensis*)
- Western white pine (*Pinus monticola*)
- Shore pine (*Pinus contorta*)
- Pacific yew (*Taxus brevifolia*)
- Seaside juniper (*Juniperus maritima*)
- Arbutus (*Arbutus menziesii*)
- Garry oak (*Quercus garryana*)
- Bigleaf maple (*Acer macrophyllum*)
- Trembling aspen (*Populus tremuloides*)



Douglas-fir (*Pseudotsuga menziesii*)



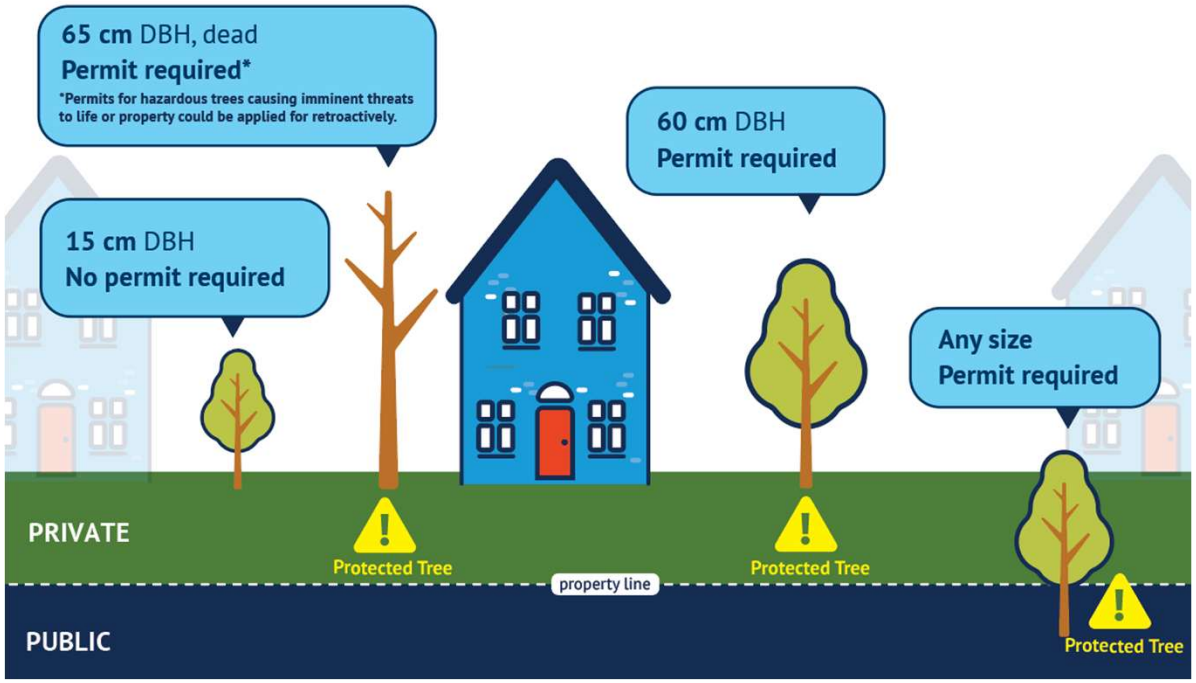
Shore pine (*Pinus contorta*)

2 – Regulated and Protected Trees

What is a Protected Tree?

A protected Tree is:

- A tree ⩾60 cm DBH on private property
- Trees of any size that are:
  - On Town property
  - Retained or planted as a condition of a permit
  - The object of a section 219 covenant.
  - A Replacement Tree planted under this bylaw
  - A Retained Tree used to reduce replacement requirements.



3 – Cutting Regulated and Protected Trees

Information requirements:

Non-development related	Permit Application (address, legal identity, number of regulated trees, number of protected trees, short description of purpose)
Development related	Arborist Report and Tree Management Plan required to accompany permit application related to development. *May be other information requirements, depending on application.

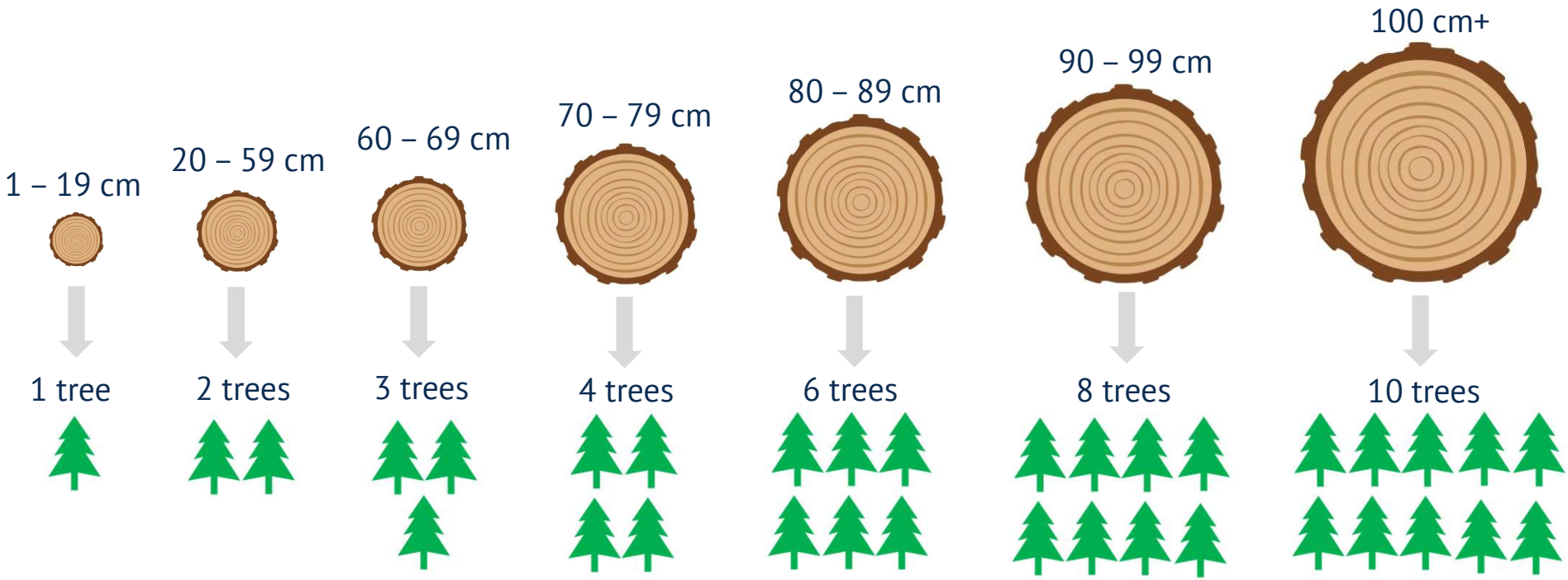
3 – Cutting Regulated and Protected Trees

Reasons a permit will be issued to cut/remove on private property:

Regulated Tree	• For any purpose of the cutting/removal
Protected Tree	• Dead, unmitigable hazard, wildfire hazard (*requires professional opinion), conflict with approved building footprint, unavoidable conflict with essential site elements, causing damage to buildings, or an invasive tree.

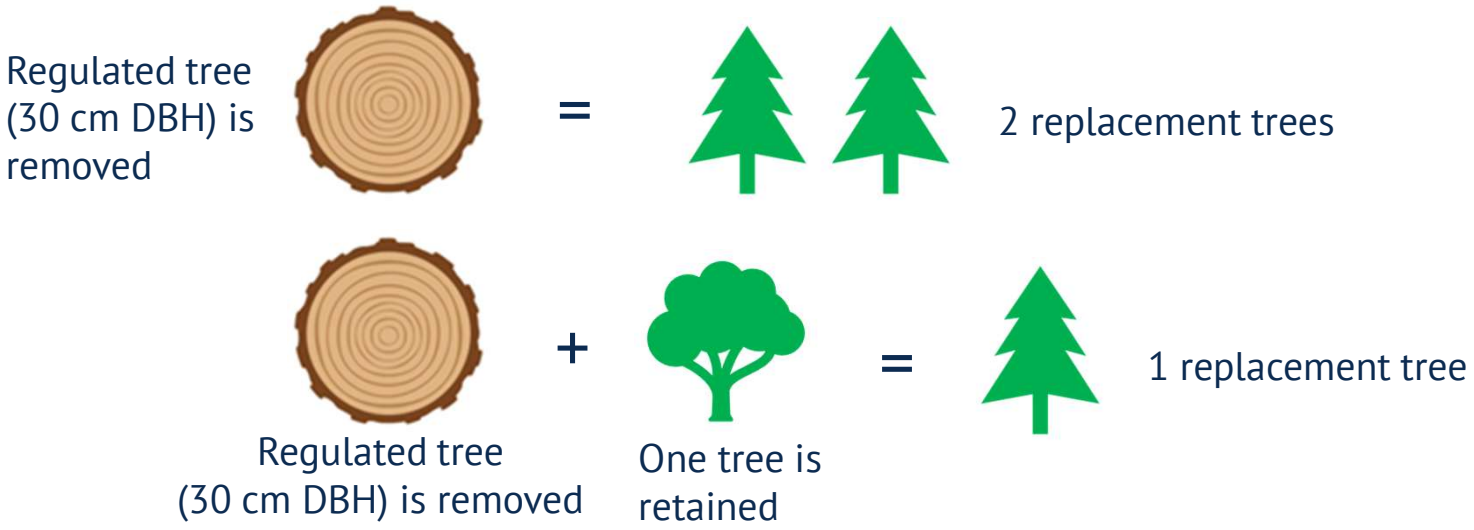
4 – Tree Replacement

Tree replacement requirements are based on the size (DBH) of the removed tree.



4 – Tree Replacement

- The number of Replacement Trees required can be reduced by one for each Retained Tree, so long as under 10 trees will have been removed from the Lot within the past 2 years



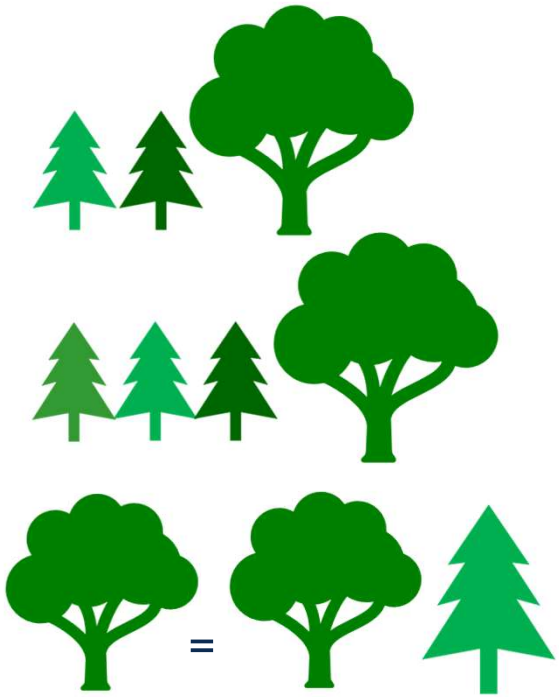
4 – Replacement Tree Selection

- Three considerations:

1) When 1, 2 or 3 Replacement Trees are required, at least 1 Replacement Tree should be a medium or large canopy species

2) When 4+ replacement trees are required, at least 25% will be a large species

3) When a Priority Species is removed, at least half of the total number of replacement trees required must also be a Priority Species.



4 – Cash-in-lieu

- Cash-in-lieu may be accepted when:

Replacement trees would not have sufficient growing space



OR

At the discretion of the Parks Manager





Cash-in-Lieu funds will be deposited in a Reserve Fund created for the Town to plant and maintain trees.



4 – Replacement Requirements - Exceptions

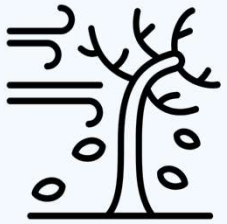
- Replacement requirements may be waived when:

Tree removal is necessary to mitigate a wildfire hazard



OR

A tree is being removed for emergency purposes



5 – Tree Protection Measures

Reasons a permit will be issued to cut/remove on private property:

Tree Protection Zones	• Default 10x DBH, can be varied by a Tree Management Plan • Fencing must be installed for the duration of the works. • Work in a Tree Protection Zone must be pre-approved and supervised by an Arborist • Signage must identify the Tree Protection Zone

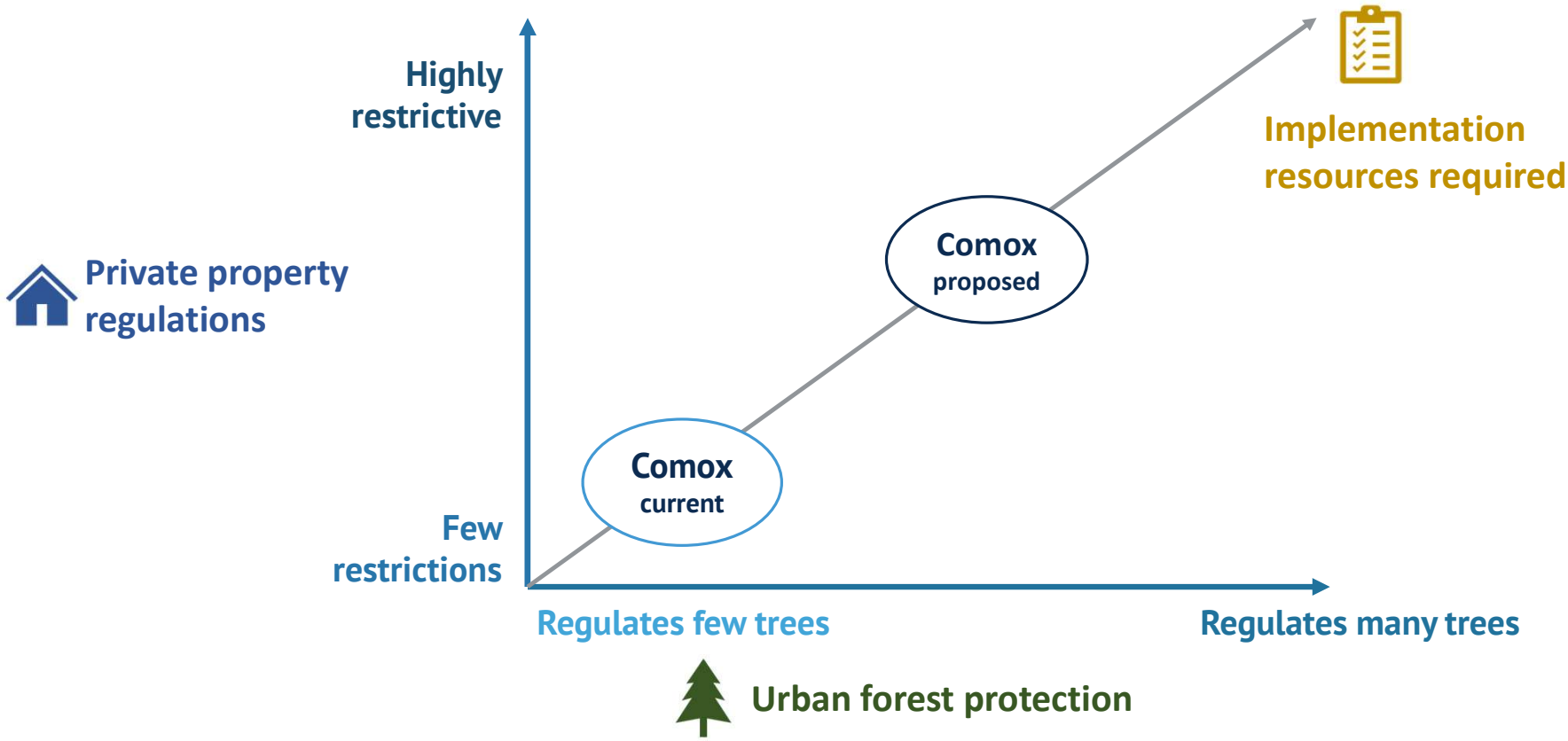
6 – Securities

Tree Permits in connection with development will require securities:

Replacement Trees	• 125% of the equivalent cash-in-lieu value, held for two years after planting.
Preserved/retained trees	• 125% of the estimated value of the trees, capped at $15,000 per single family dwelling/lot and $150,000 in connection with a subdivision, development permit, development variance permit, or rezoning.

4. Implementation Considerations

Summary of Anticipated Impacts



Implementation Considerations

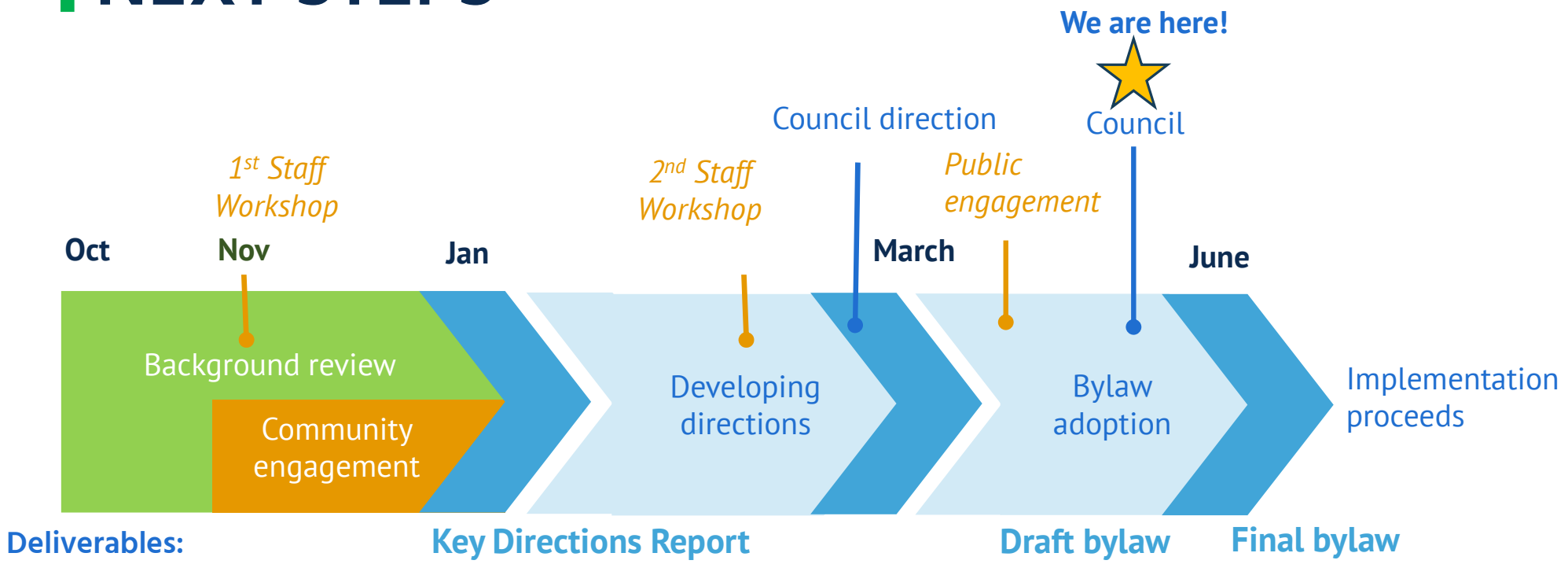
1. Increased Staffing Requirements:
   - New bylaw will expand permit process, increasing demands on staff.
2. Permit Volume Uncertainty
   - Estimate: one FTE per 250 permits
3. Awareness and Outreach
   - New bylaw will require education and explanatory materials.

Questions



5. Next Steps

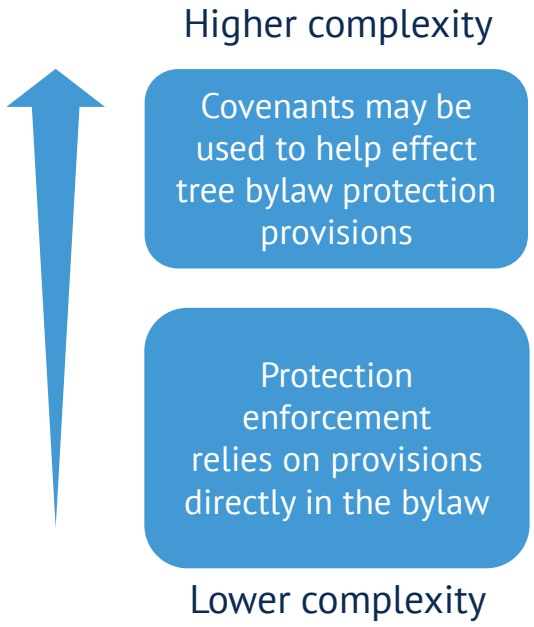
NEXT STEPS


We are here!
Council
Council direction
1st Staff Workshop
2nd Staff Workshop
Public engagement
Oct
Nov
Jan
March
June
Background review
Community engagement
Developing directions
Bylaw adoption
Implementation proceeds
Deliverables:
Key Directions Report
Draft bylaw
Final bylaw

Topic 5 – Covenants

- **Current**
  - Several hundred trees are currently protected on private property under Section 219 covenants entered during the development process.
  - These covenants will continue to apply until discharged.

- **Future**
  - Relying on the tree bylaw for first-line tree protection is the preferred direction of staff.
  - If existing covenants are to be discharged, without affecting the protection of affected trees, the affected trees would need to be addressed specifically by the tree bylaw.



Best Practices Recommendations

Other classes of regulated trees

Town-owned: trees of any size

Private:

- Trees ⩾ 10 cm in diameter for the following **species**:
  - Douglas-fir, grand fir, western redcedar, Sitka spruce, Garry oak, arbutus
- All trees in **environmental or hazard lands (steep slopes) DPAs**
- All trees with evidence of **nesting or use by raptors**
- All trees planted or retained as a condition of a **permit** (e.g., retained + replacement trees, Zoning trees)

***Exemptions**: Town staff/agents on municipal property, tree farms and nursery operations, public utilities managing their own infrastructure, private forest management under the Assessment Act or Forest Act, or B.C. Land surveyors.*

Best Practices Recommendations

Tree Protection Zone

- Determines:
  - Where tree protection fencing required by the bylaw is installed
  - When there is a conflict with new infrastructure that may justify tree removal
- Recommendation:
  - 10x DBH default, able to be varied by arborist with justification
  - Balances the area available to protect the tree with need for site access.
  - Is established to avoid removal of fencing during site works

Best Practices Recommendations

Fees

- **Dead**, **hazardous** and **invasive** trees: **0$**
- **Non-development-based** applications: **$50**
- **Development-based** applications: **$100**

Securities

- For each **Protected Tree** retained**: $1,000 / tree**
- For each **Significant Tree** retained**: $2,500 / tree**

Up to $150,000, or $15,000 per single-detached lot per application.

- For each replacement tree required: **equal to the Town's cost of planting and establishment**

What is Regulated: Examples



Red maple on private property, 10 cm dbh	Red maple on private property, 25 cm dbh, no development	Red maple on private property, 25 cm dbh, development connection	Heritage red maple, listed in tree schedule, development connection
No permit required (Unregulated)	Permit required, can be removed for any reason	Permit required, must be retained unless valid reason applies	Permit required, must be retained unless valid reason applies, with exploration of site design as needed

What We Heard From Staff

- Clear, understandable, and simple process
- Ensure bylaw enforcement is reasonable for staff and resourcing
- Attempt to address tree cutting prior to bylaw enactment
- Continue to require a tree permit with Development Permits
- Reduce burden on non-development applications



URBAN FOREST MANAGEMENT STRATEGY & TREE PROTECTION BYLAW UPDATE

March 2026

COUNCIL WORKSHOP

TOWN OF COMOX

AGENDA

Part A: Urban Forest Management Strategy

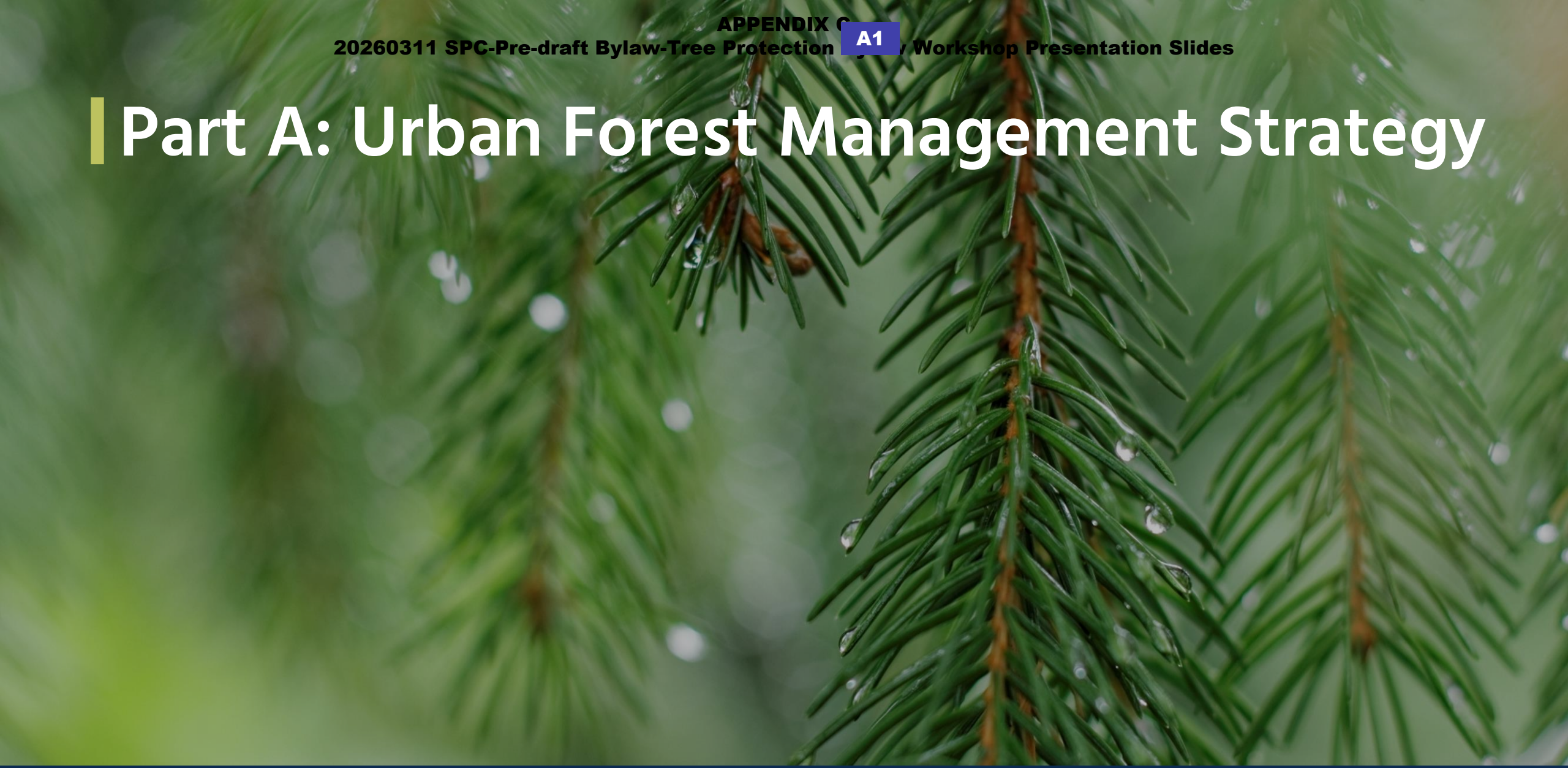
Questions

Part B: Tree Protection Bylaw Update

Questions



Part A: Urban Forest Management Strategy



Part A: Urban Forest Management Strategy

1. Project Overview
2. Comox's Urban Forest
3. What We Heard
4. Strategic Framework

1. Project Overview

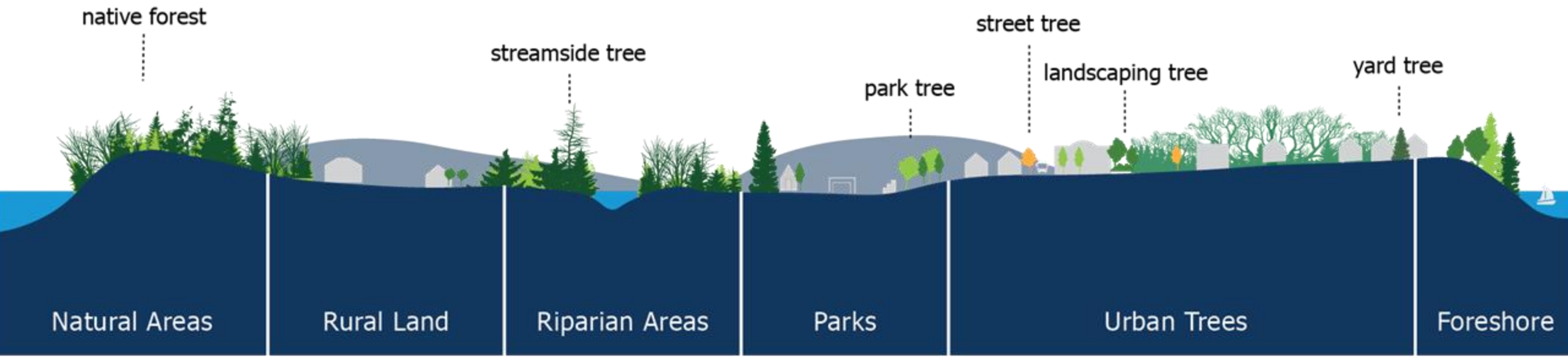
PROJECT TIMELINE



URBAN FORESTRY 101:

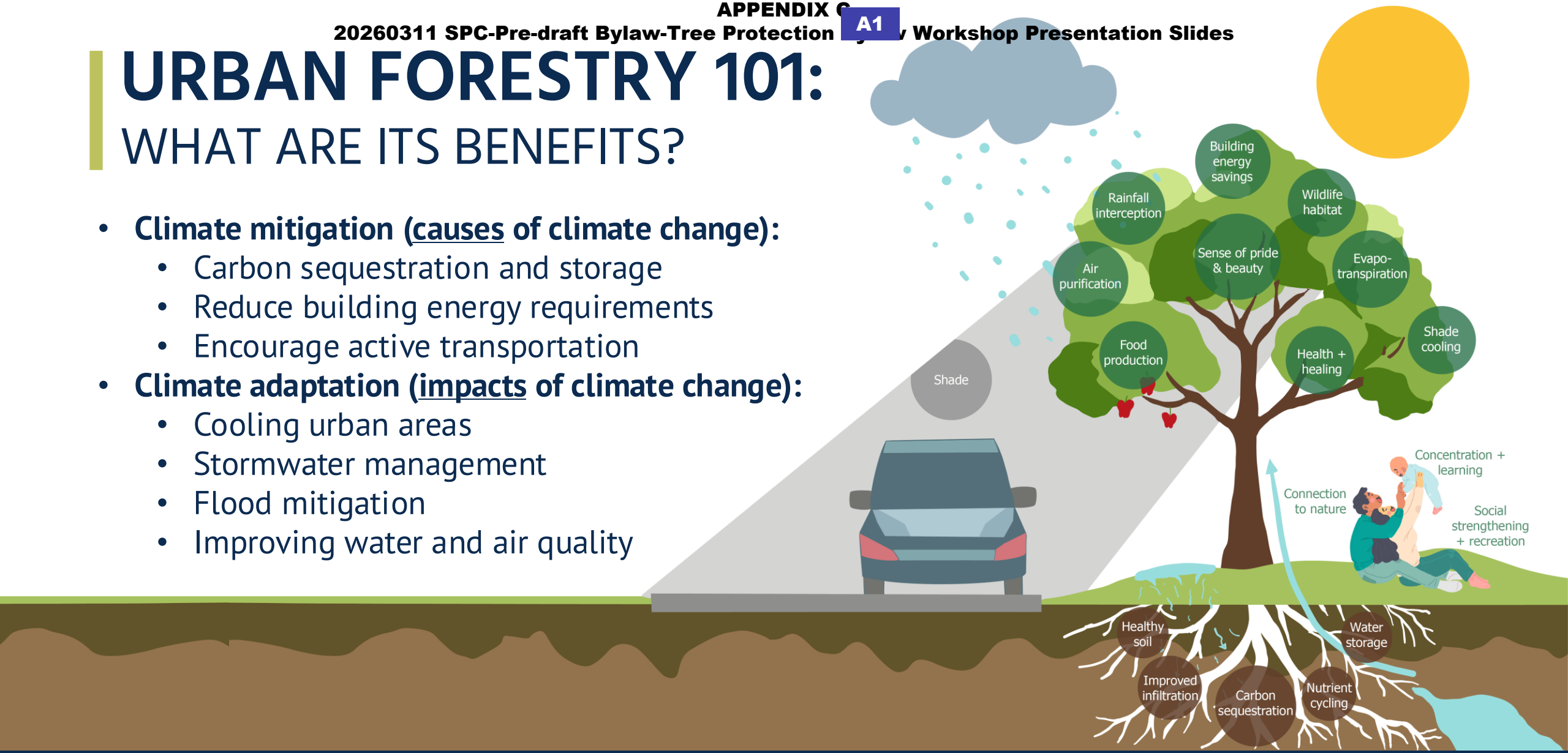
WHAT IS THE URBAN FOREST?

The urban forest consists of all trees within the municipal boundaries of Comox.



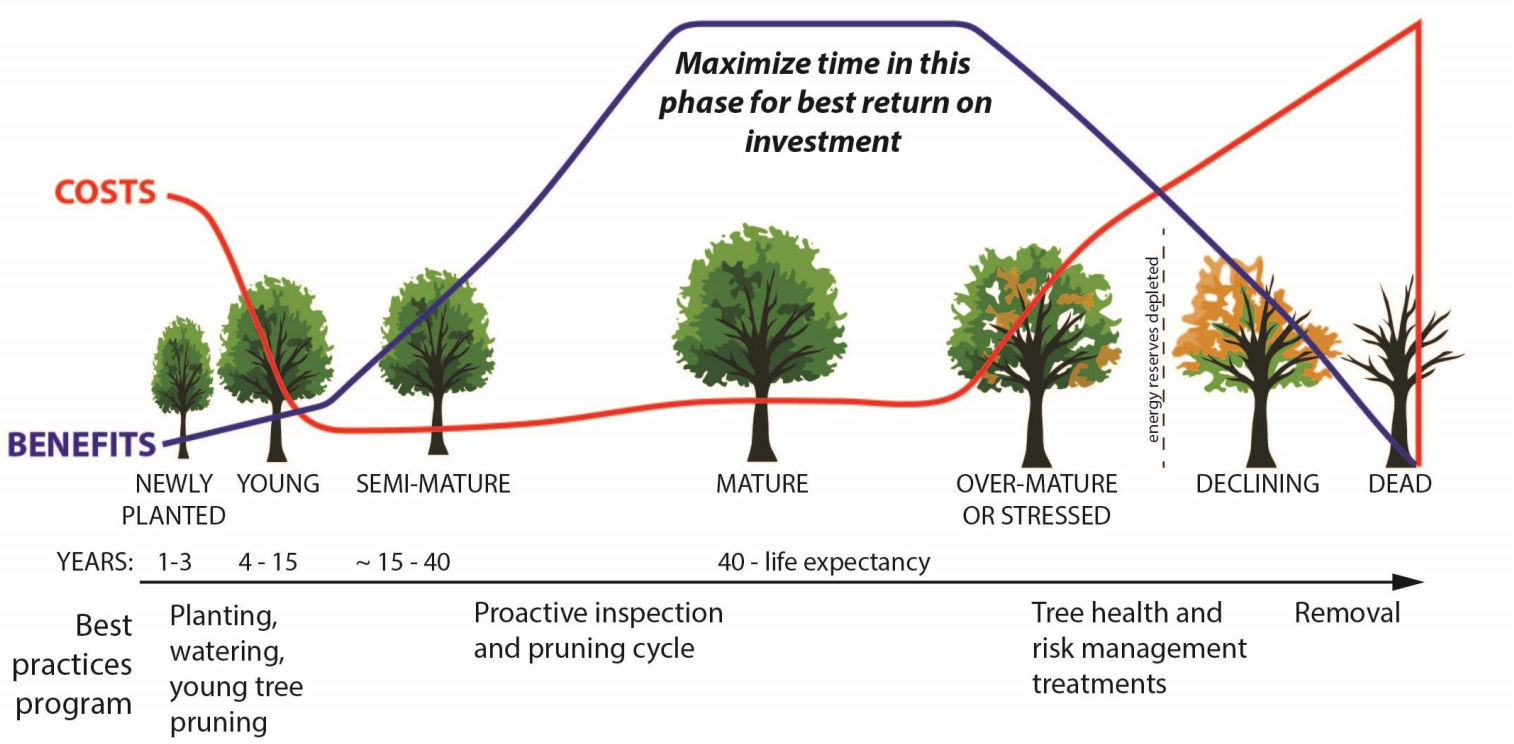
URBAN FORESTRY 101:
WHAT ARE ITS BENEFITS?

- **Climate mitigation (causes of climate change):**
  - Carbon sequestration and storage
  - Reduce building energy requirements
  - Encourage active transportation
- **Climate adaptation (impacts of climate change):**
  - Cooling urban areas
  - Stormwater management
  - Flood mitigation
  - Improving water and air quality



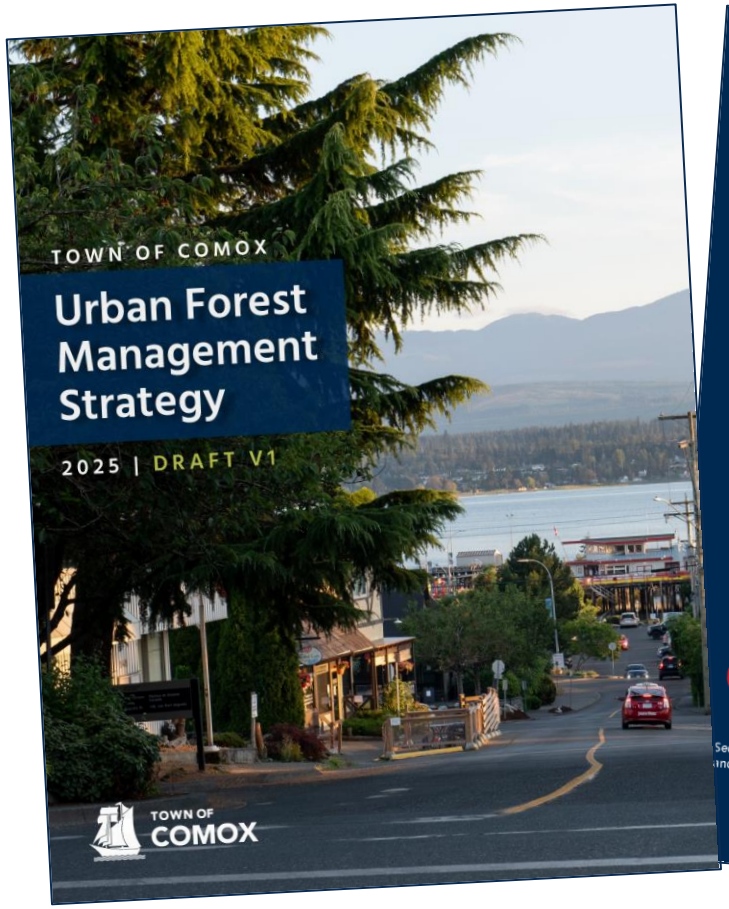
URBAN FORESTRY 101:

TREES AS GREEN INFRASTRUCTURE



URBAN FORESTRY 101:

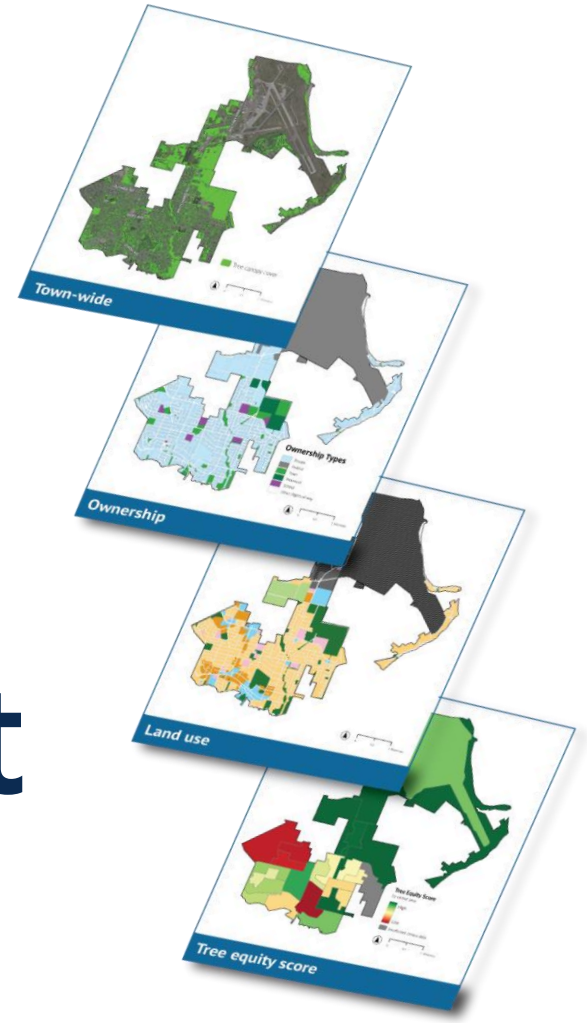
WHY A MANAGEMENT STRATEGY?





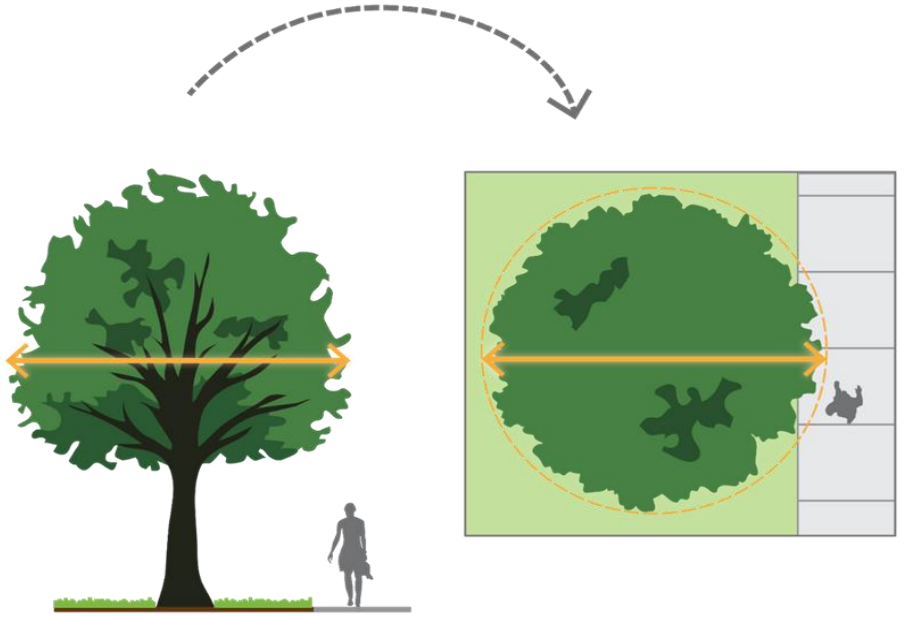
- Fulfills OCP direction
- Establishes baselines
- Identifies long-term vision for management
- Organizing framework for implementation

2. Comox's Urban Forest



FINDINGS:
WHAT IS CANOPY COVER?

- A common measure of the extent of the urban forest
- Area of land occupied by tree crowns when viewed from above

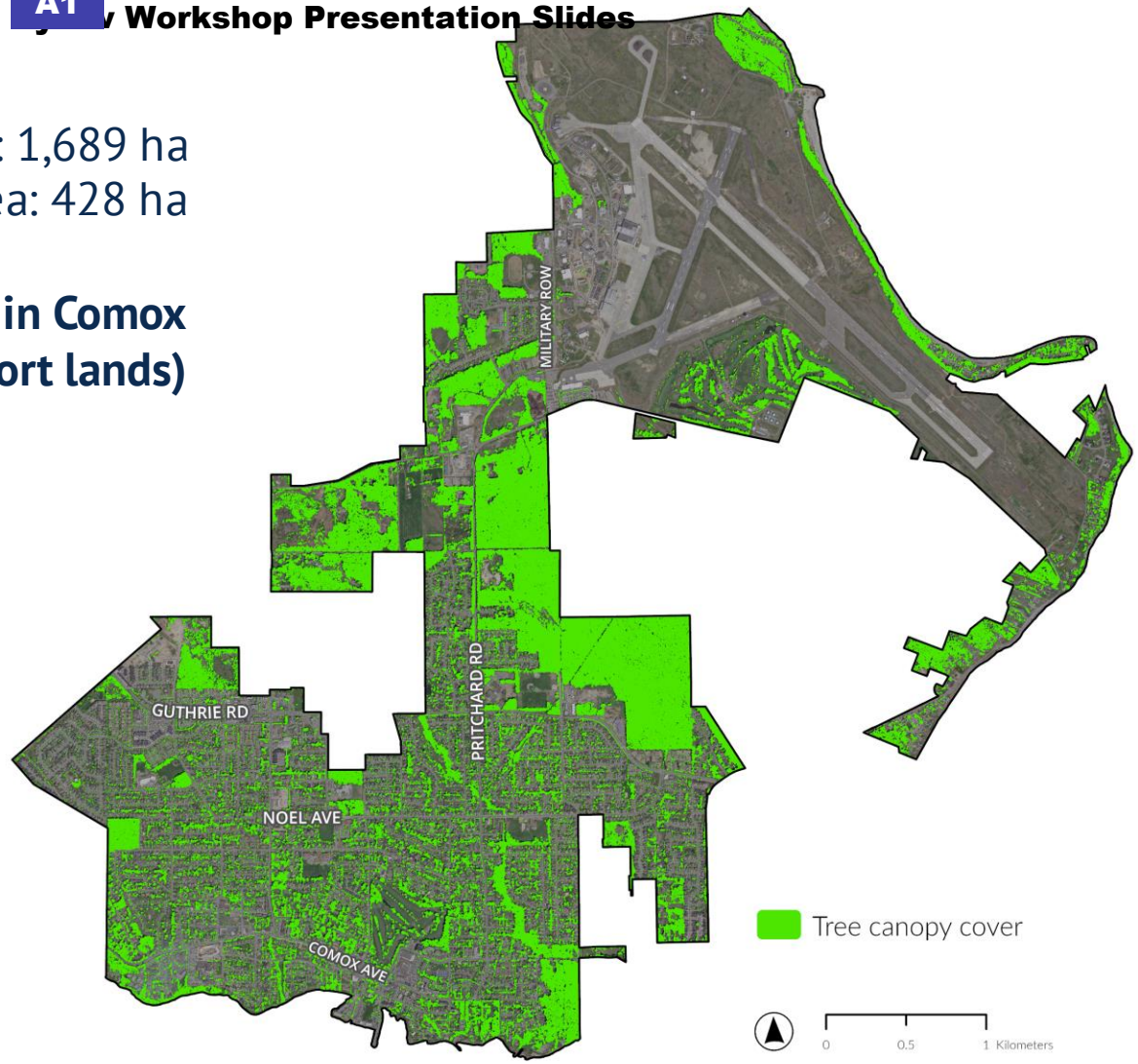


FINDINGS:
CANOPY IN 2025

Land area: 1,689 ha
Canopy area: 428 ha

25% canopy cover in Comox
(33% excluding airport lands)

How we compare:

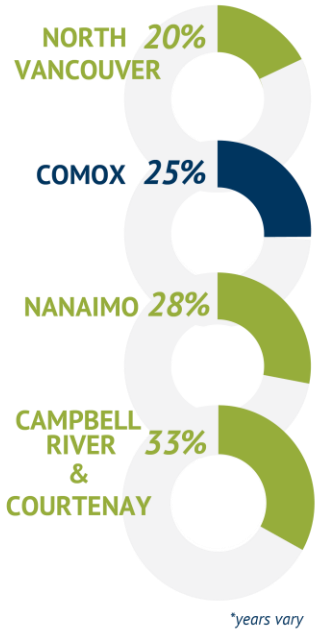


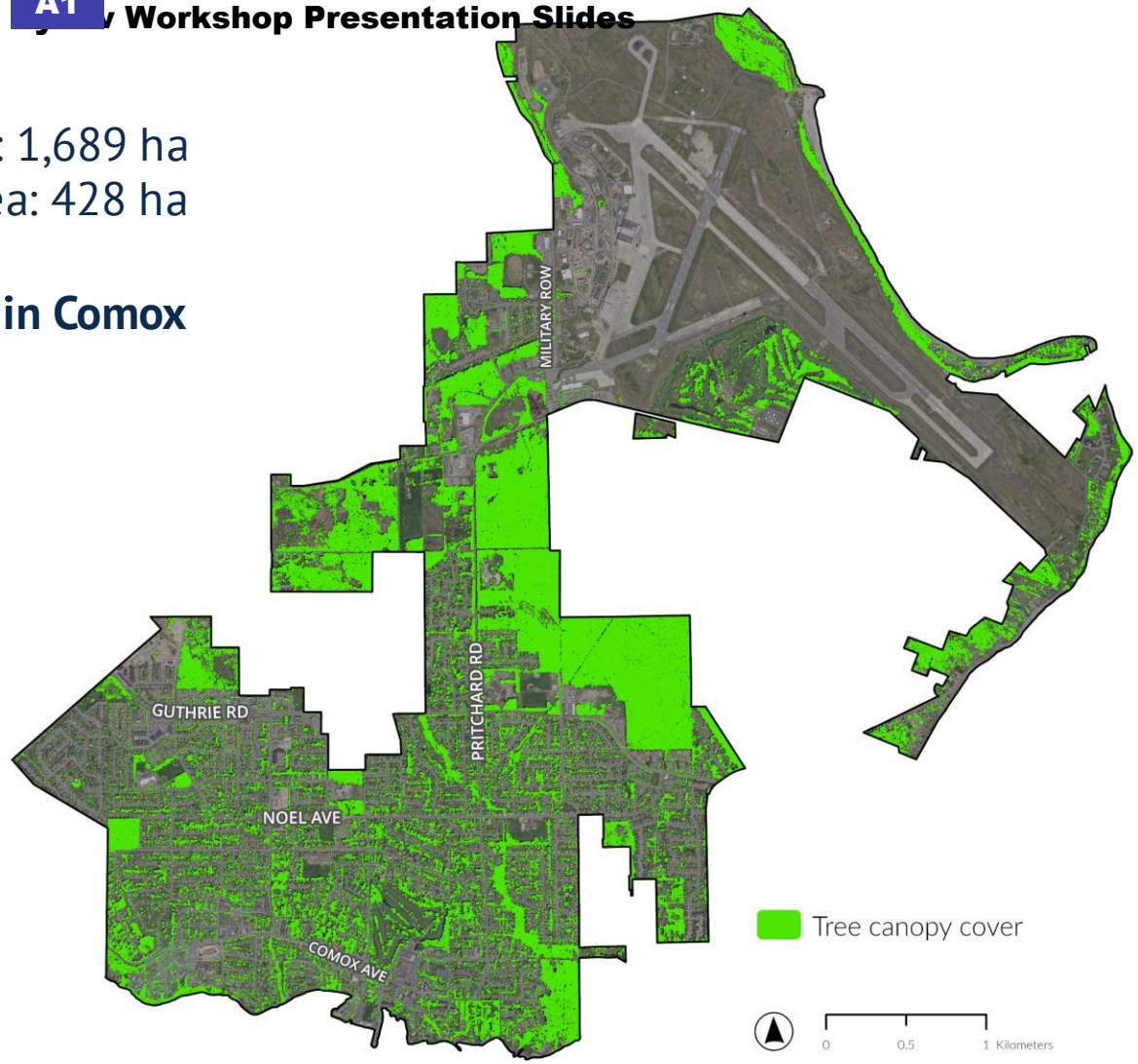
FINDINGS:
CANOPY IN 2025

Land area: 1,689 ha
Canopy area: 428 ha

25% canopy cover in Comox

How we compare:





FINDINGS:

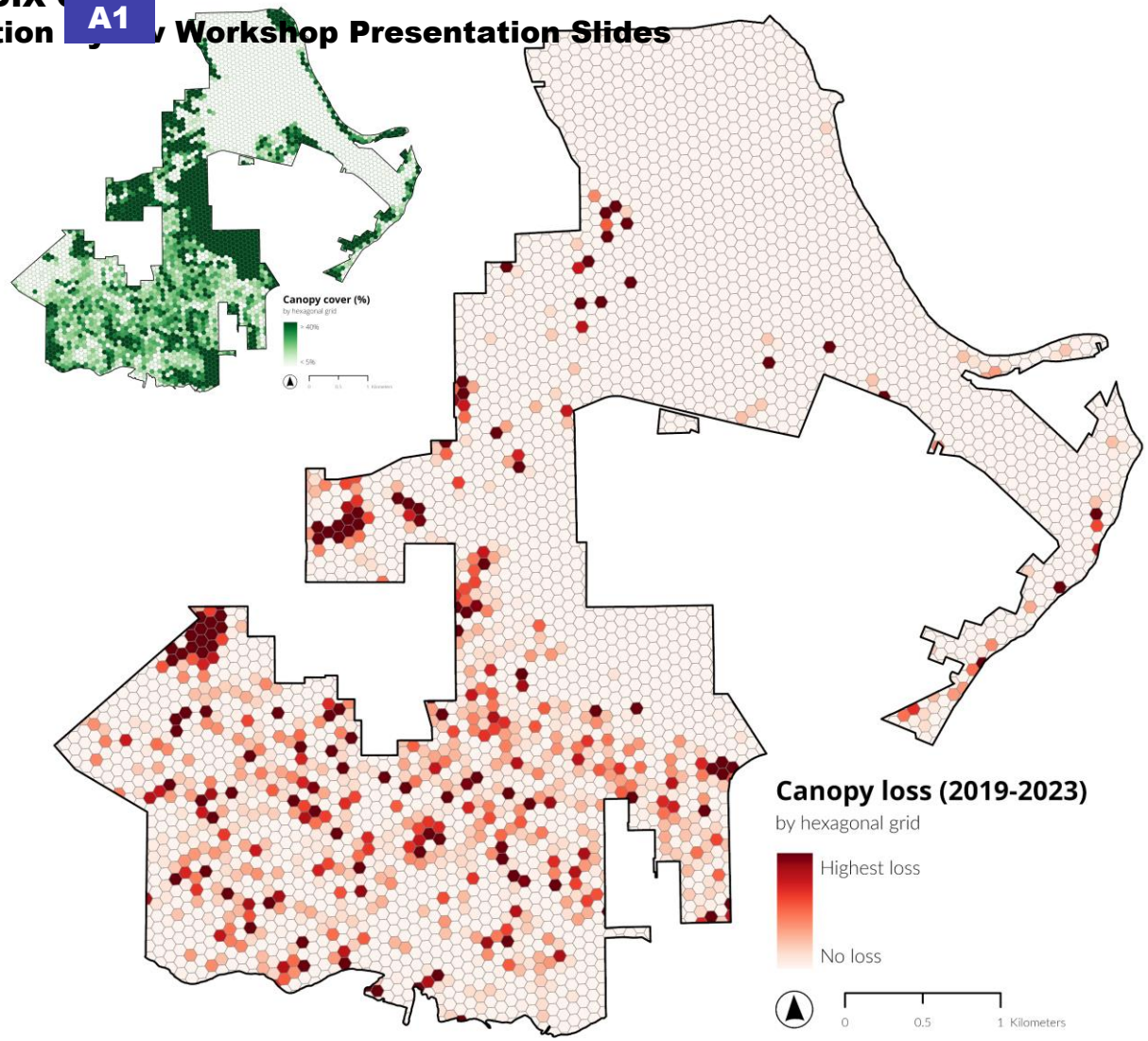
CANOPY LOSS 2019-2025

2019 canopy: 456 ha = 27%
2023 canopy: 438 ha = 26%
2025 canopy: 428 ha = 25%

27 ha (-2%) of canopy loss between 2019 and 2025

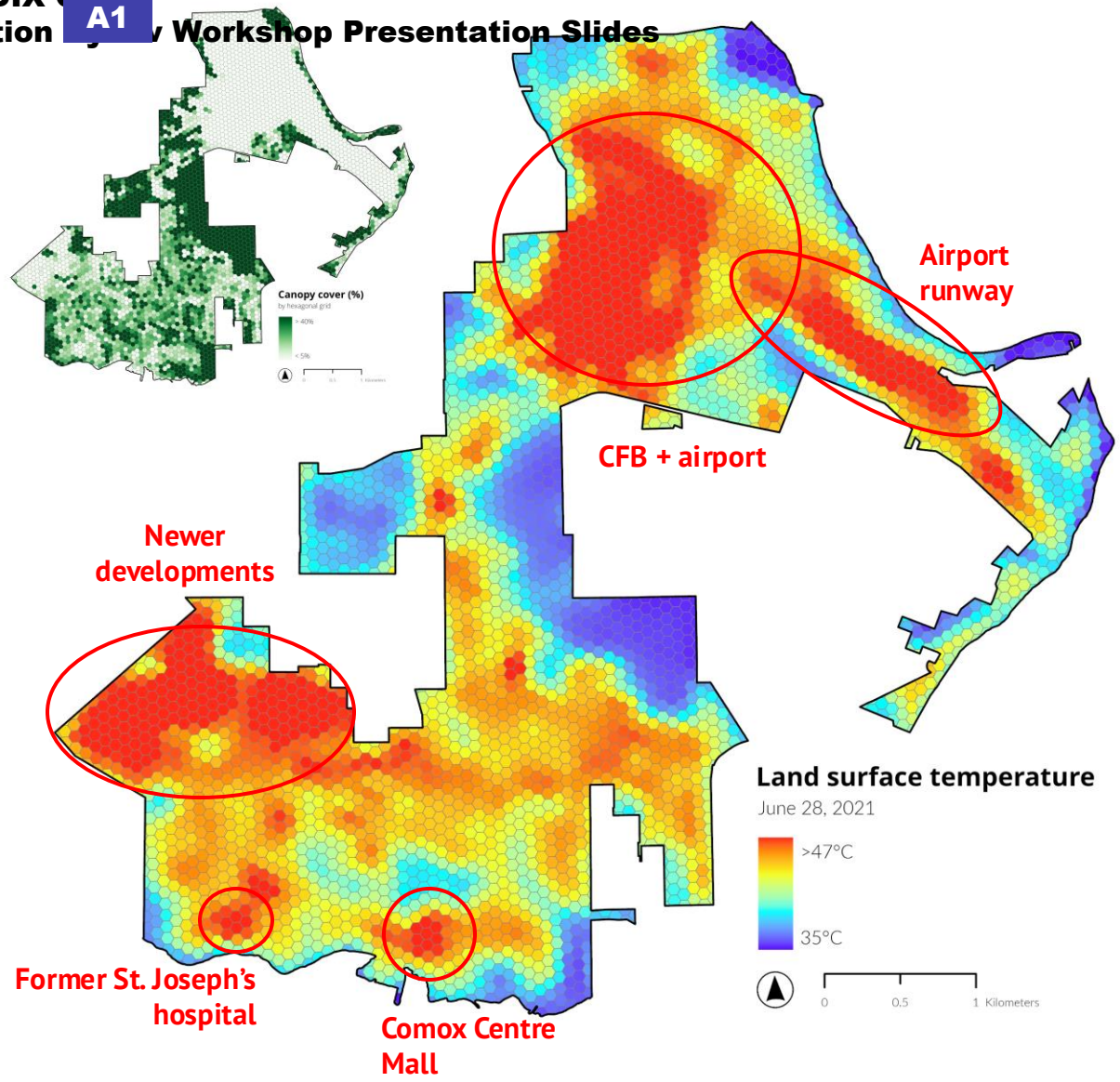
Likely causes:

- Greenfield development
- Infill development and property maintenance
- Capital projects
- Forest health problems
- Hazard tree removal



FINDINGS:
URBAN HEAT

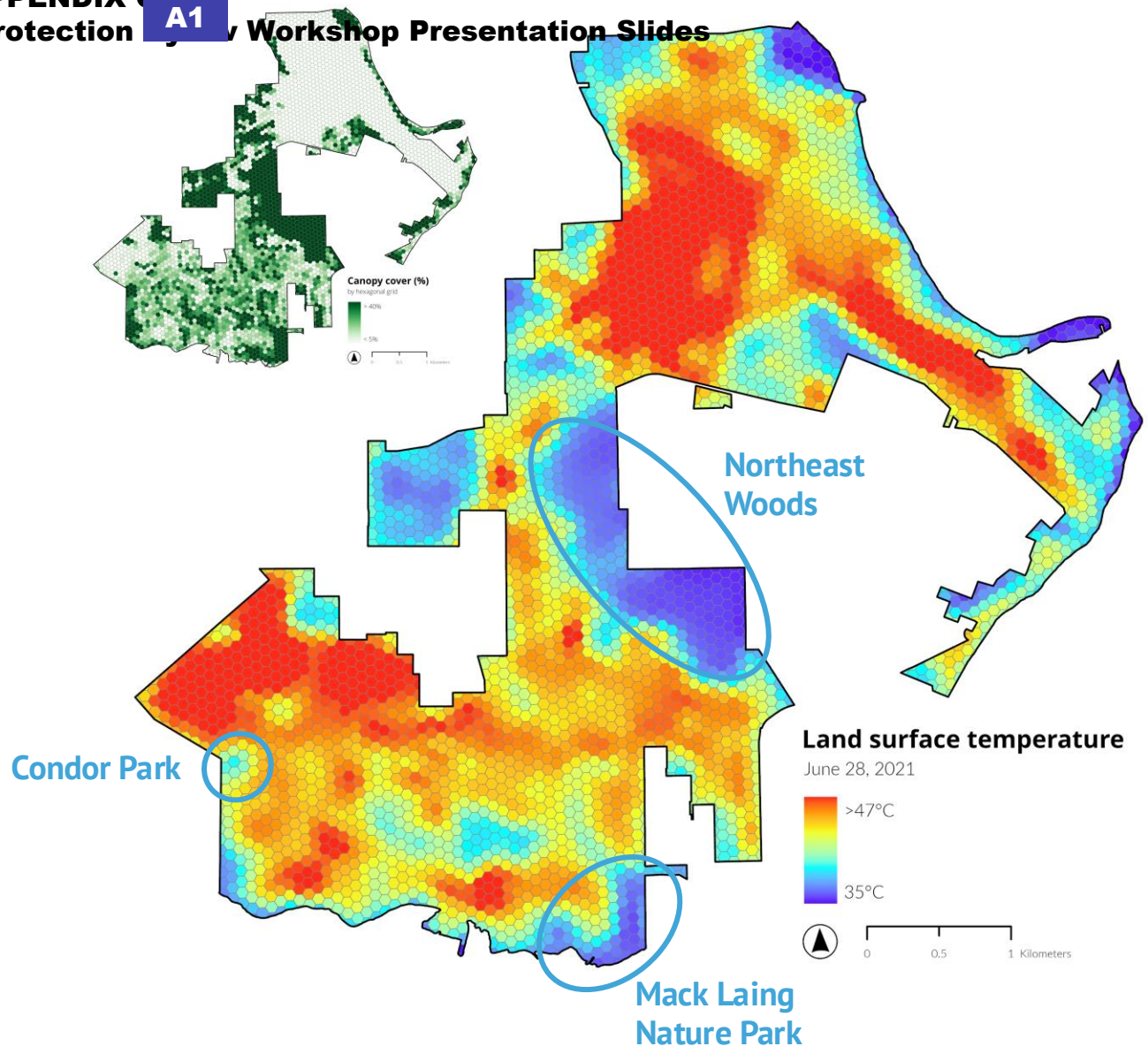
- During the June 2021 heatwave, land surface temperatures in low canopy areas were over 12 degrees **warmer** than forested areas which were cooler
  - the "*heat island effect*"



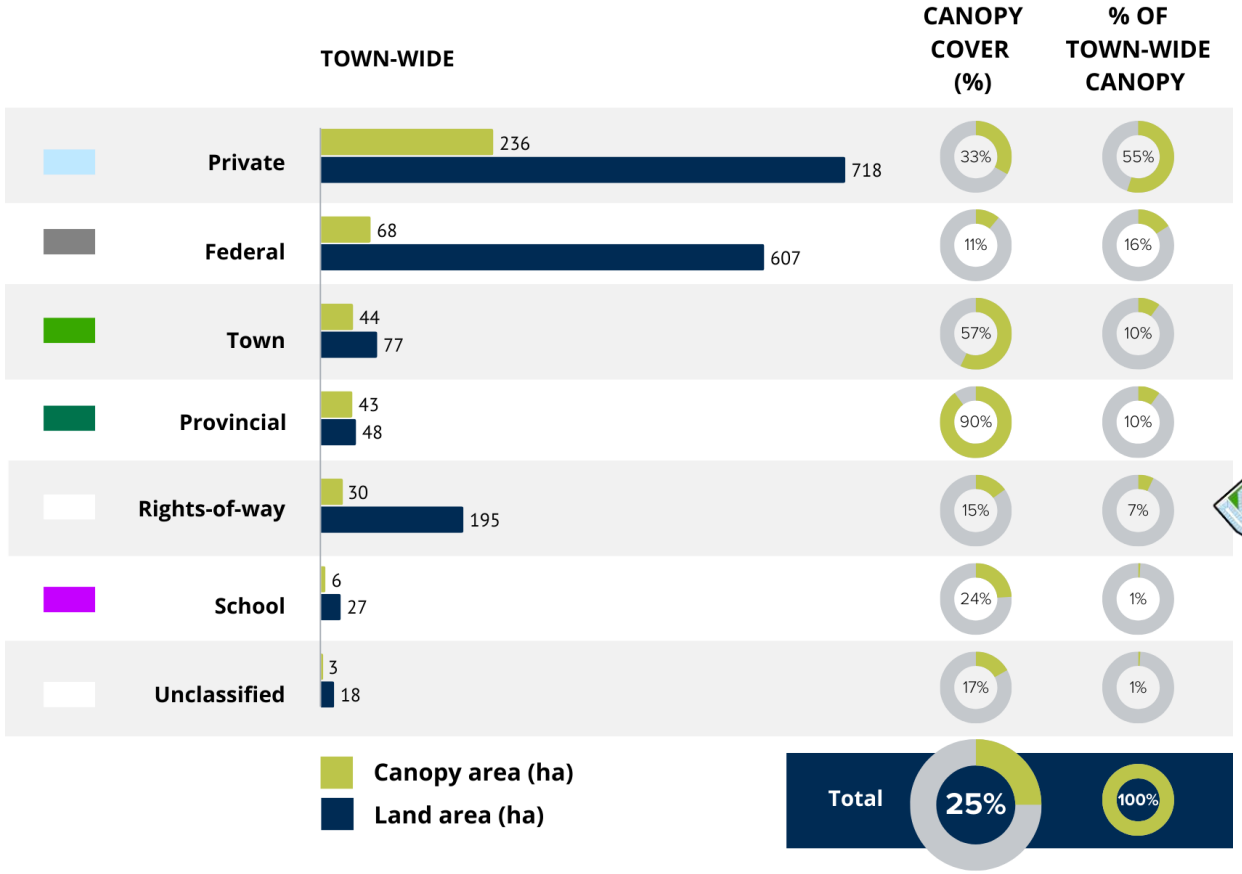
FINDINGS:
URBAN HEAT

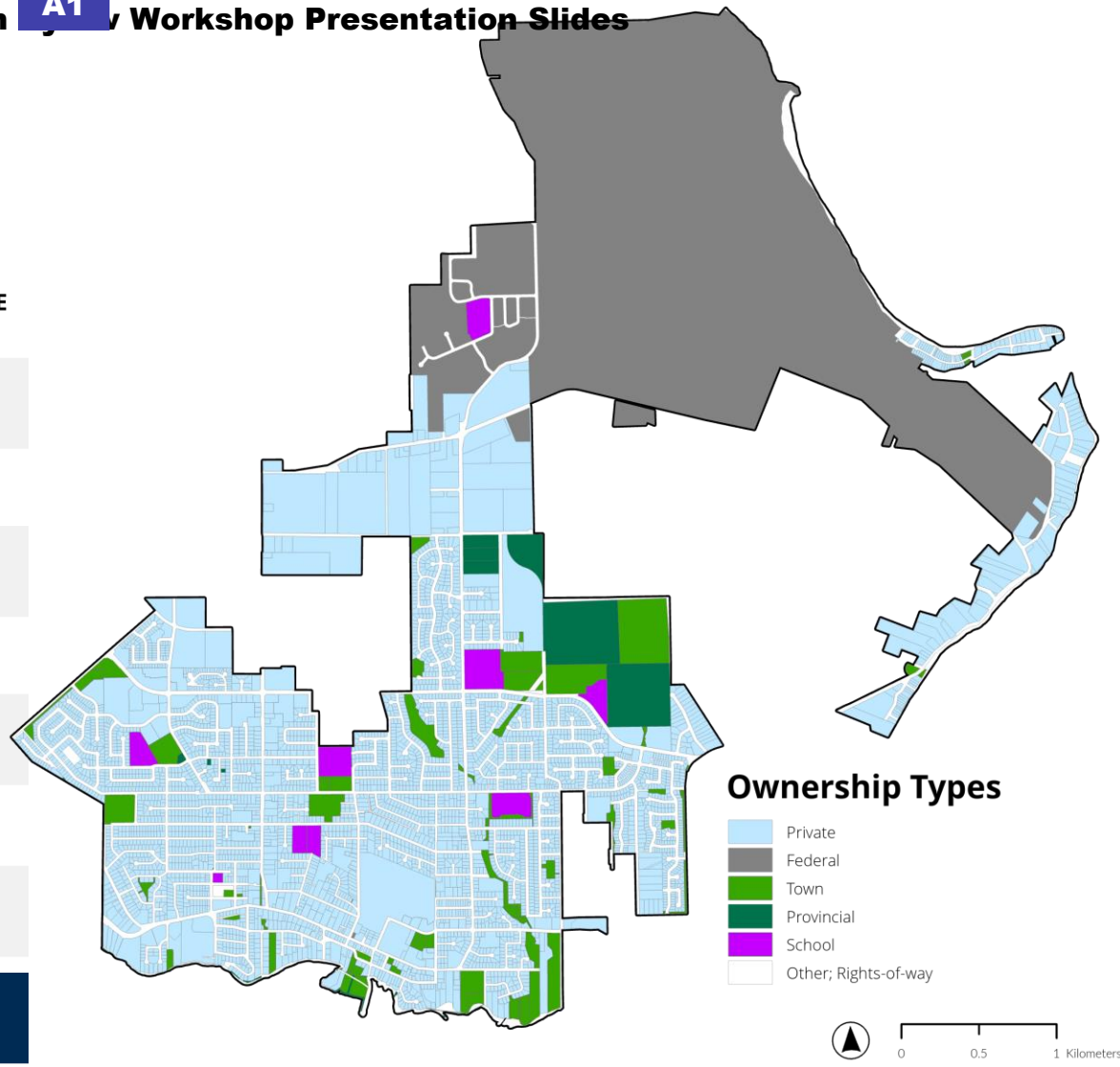
- During the June 2021 heatwave, land surface temperatures in low canopy areas were over 12 degrees **warmer** than forested areas which were **cooler**
  - the "*heat island effect*"

- Research has found a 1°C decrease in temperature for every 10% increase in canopy cover at the parcel scale

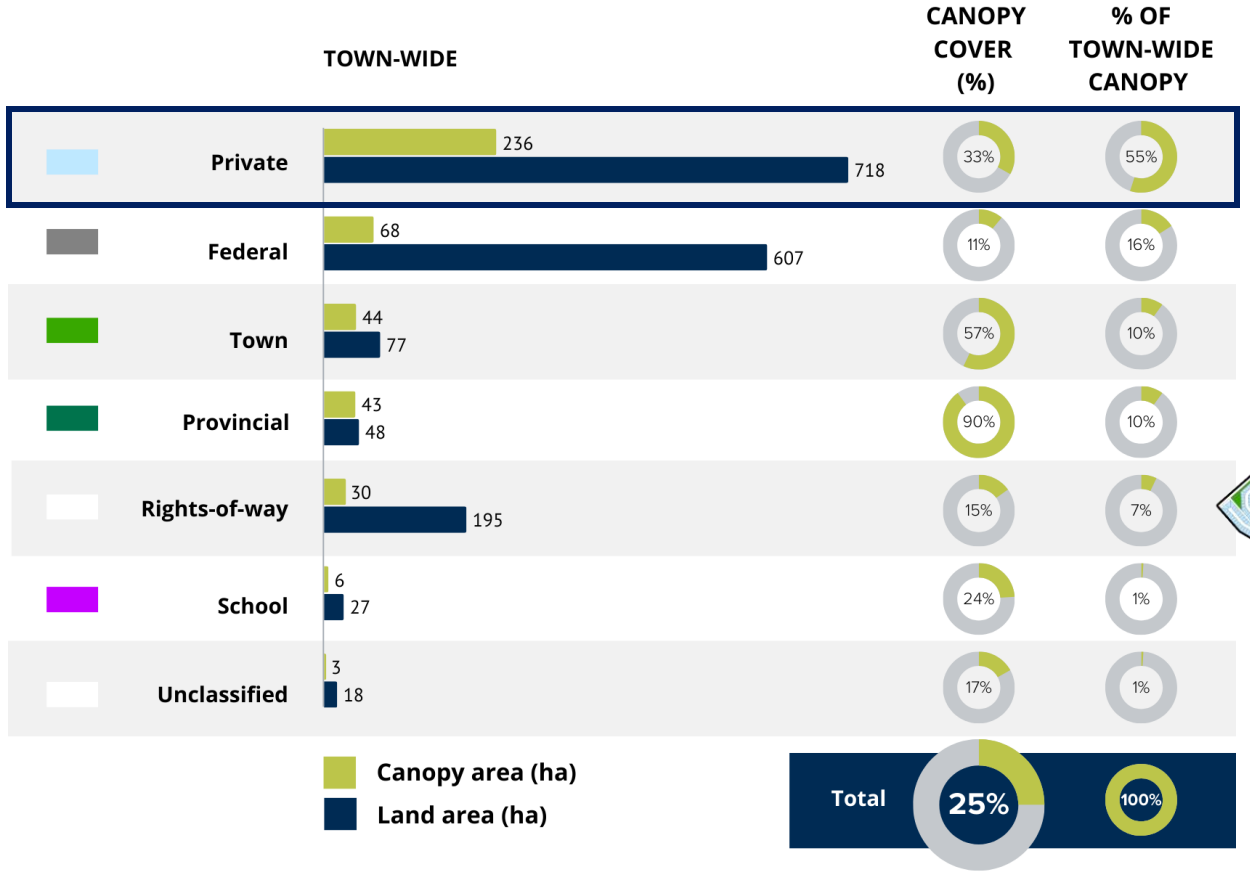


FINDINGS:
OWNERSHIP

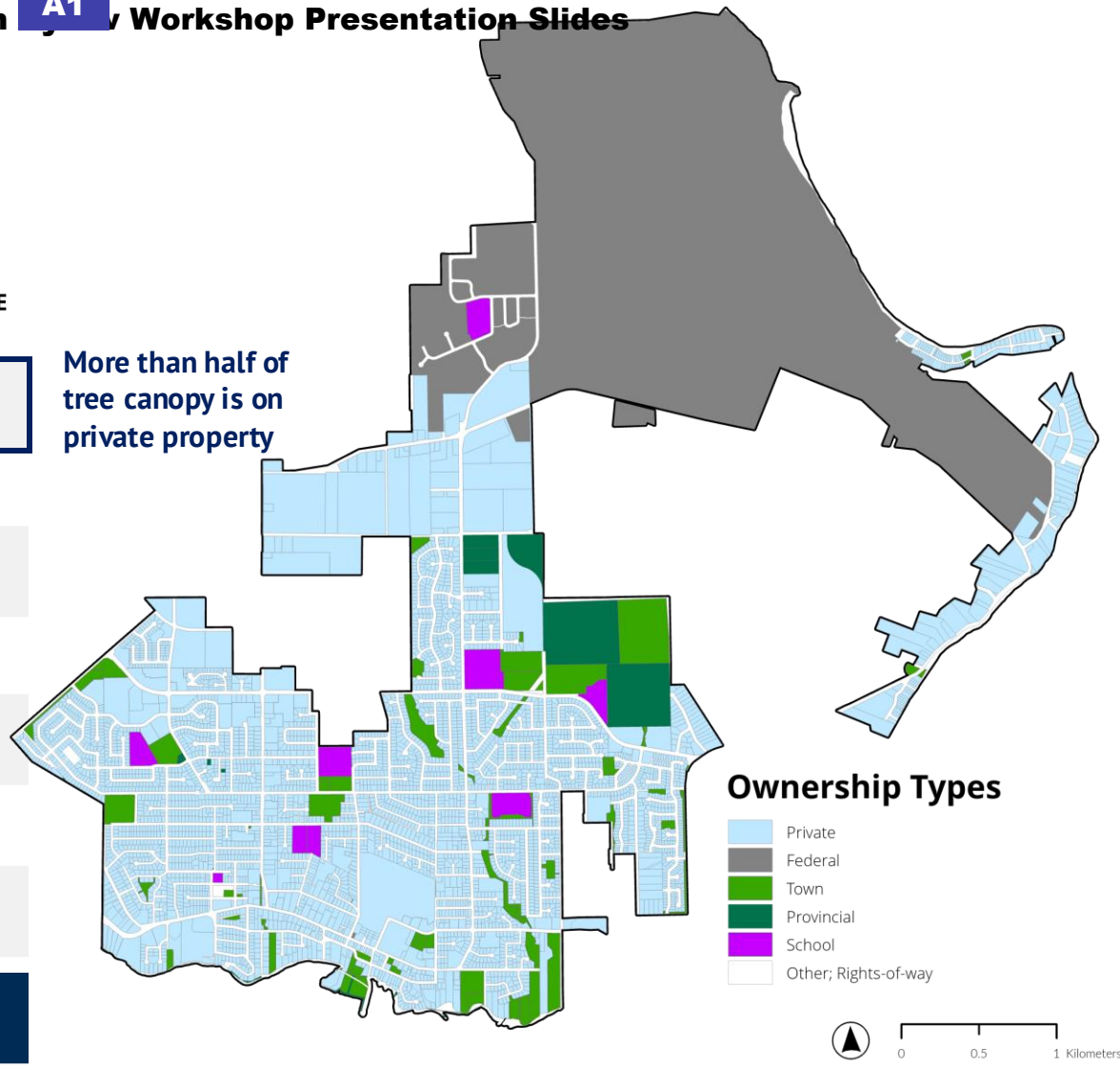




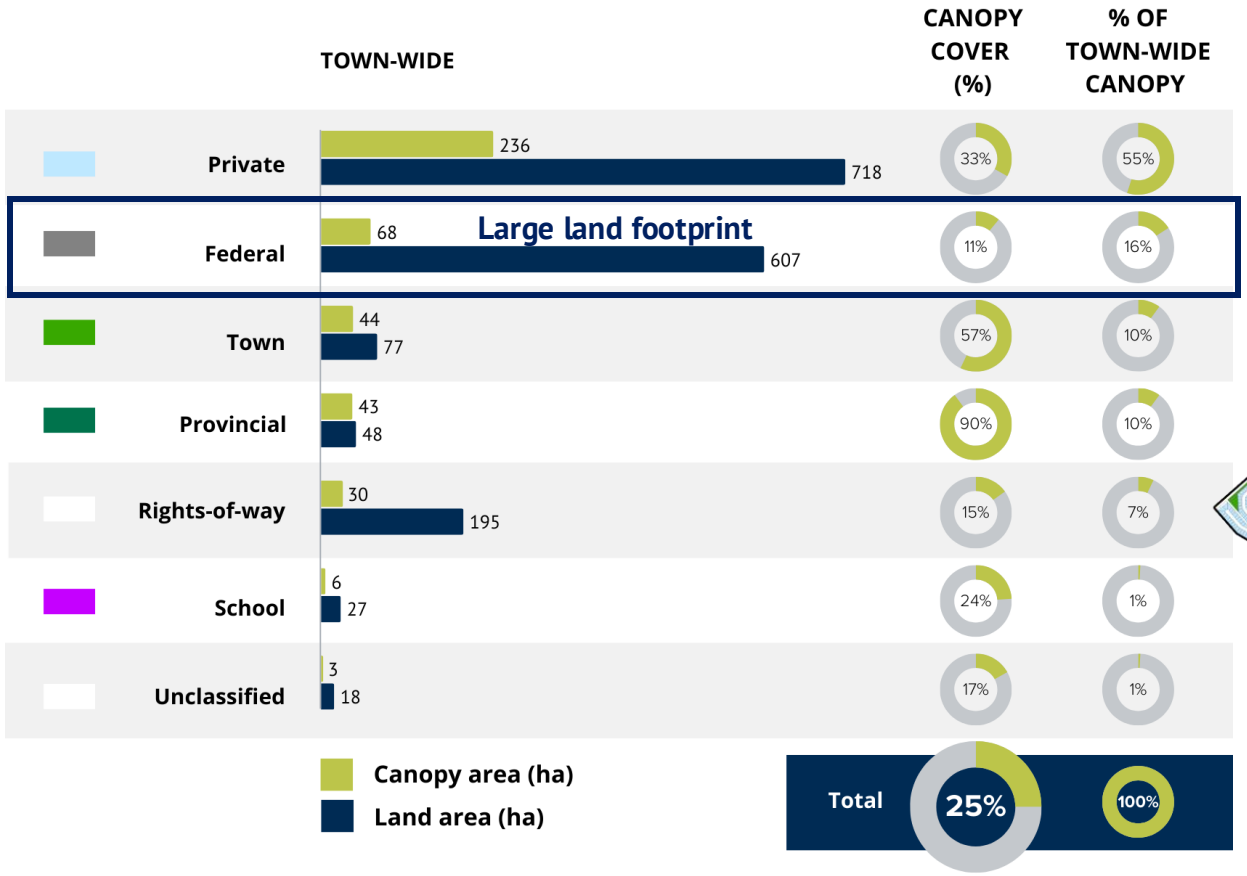
FINDINGS:
OWNERSHIP

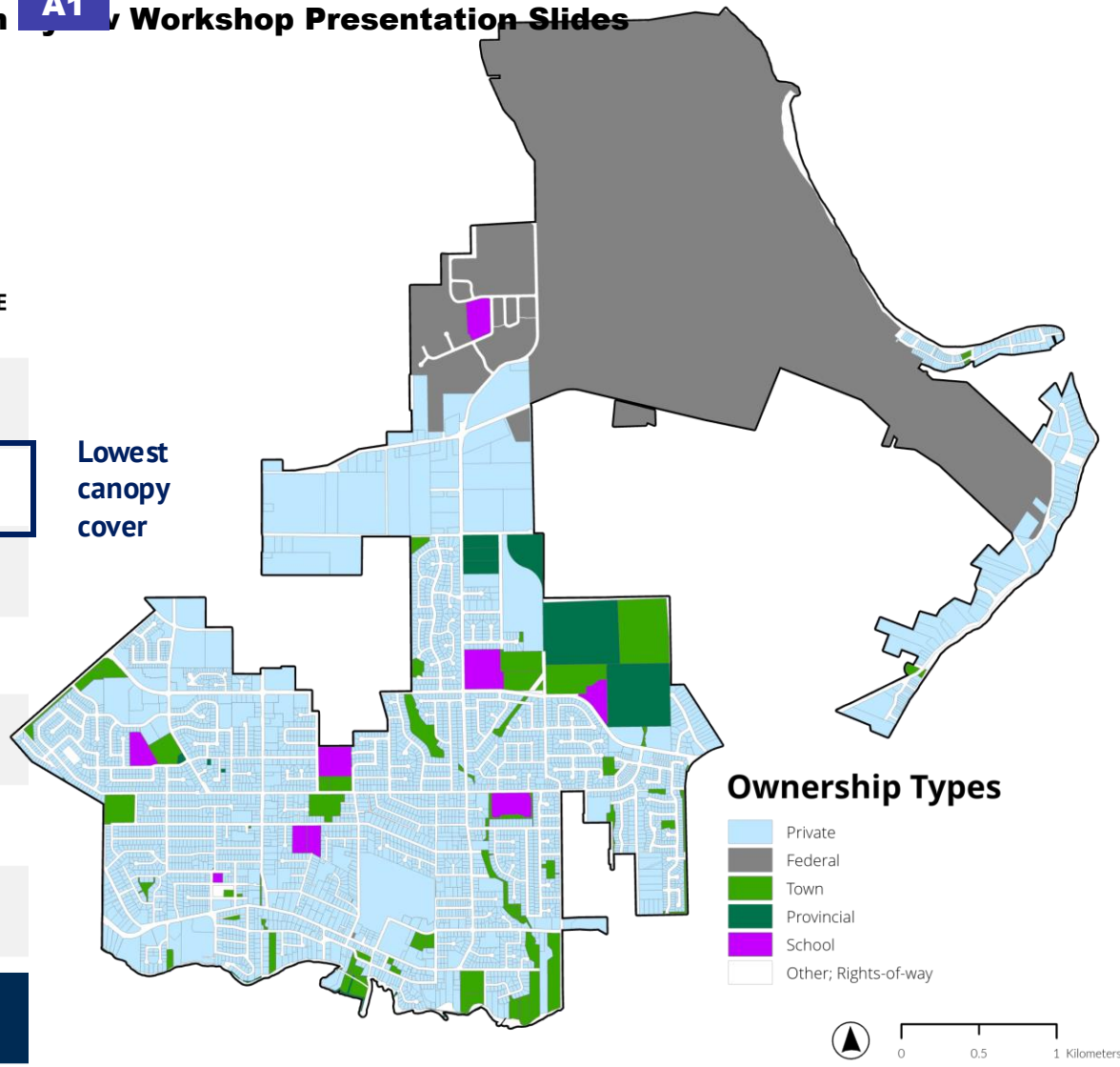


More than half of tree canopy is on private property

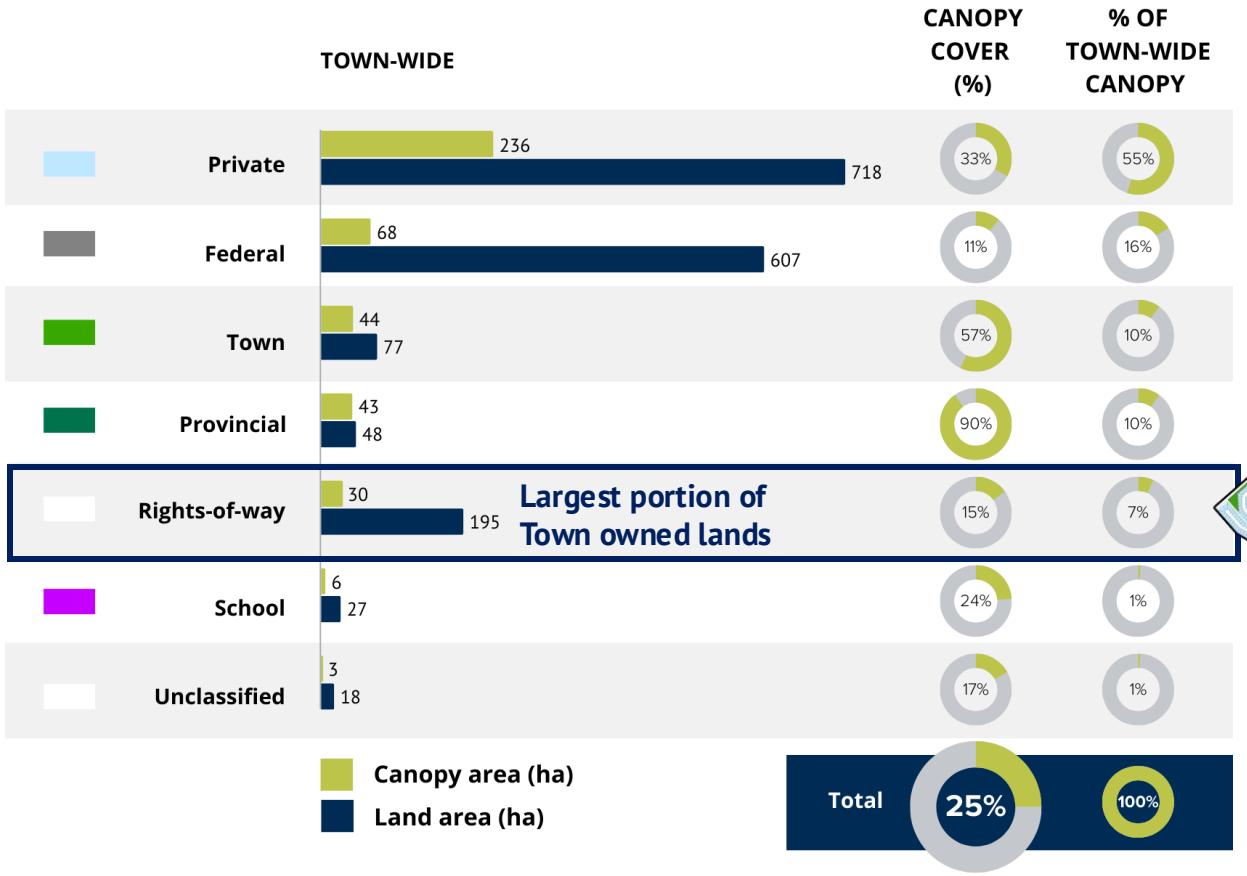


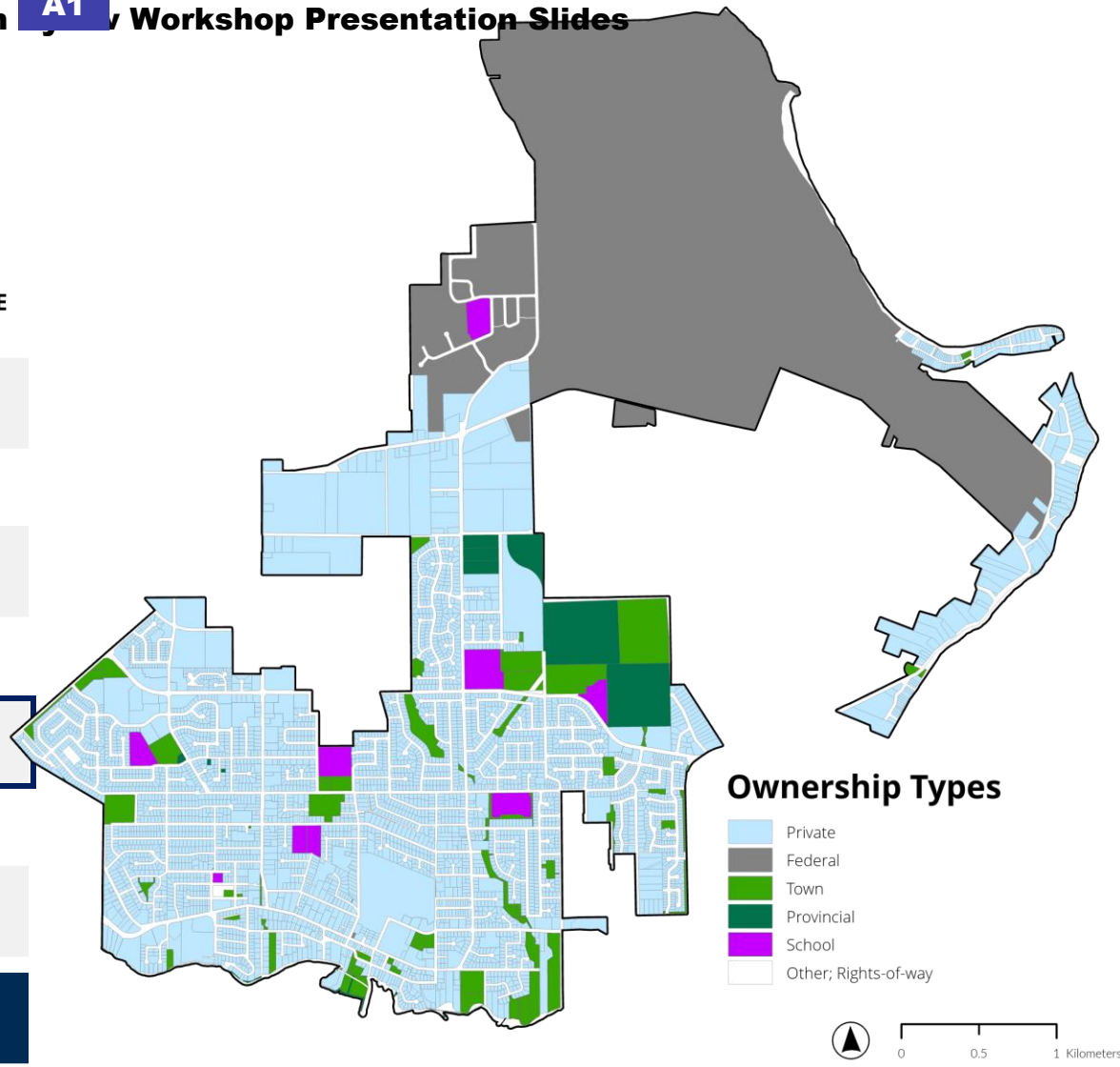
FINDINGS:
OWNERSHIP





FINDINGS:
OWNERSHIP

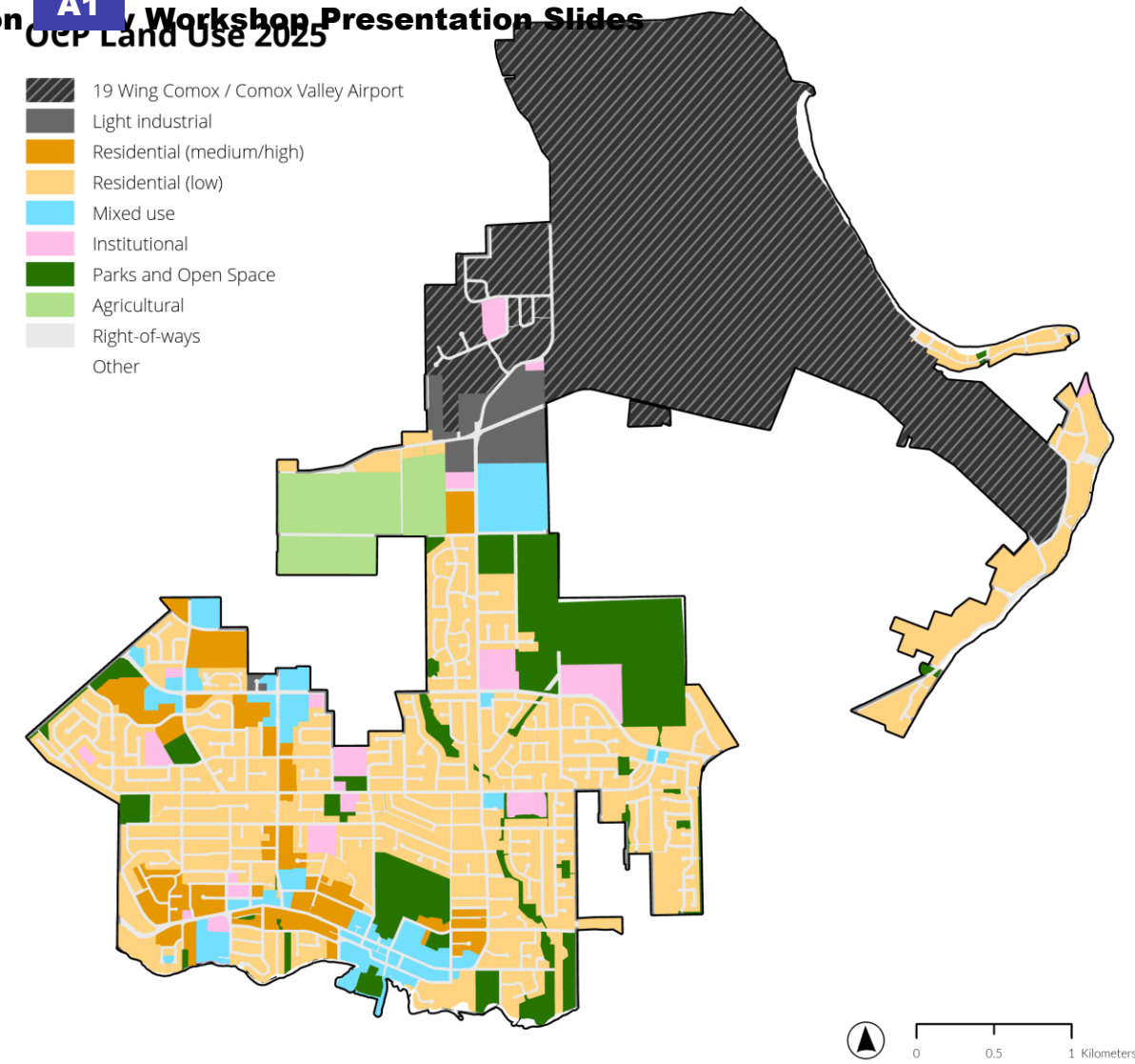




FINDINGS:

OCP LAND USE

Legend color	Land use	Canopy cover (%)
	Parks and Open Space	70%
	Agricultural	51%
	Light industrial	37%
	Mixed use	32%
	Residential (low)	30%
	Residential (medium/high)	26%
	Institutional	25%
	Other	15%
	Rights-of-way	15%
	19 Wing Comox / Comox Valley Airport	11%

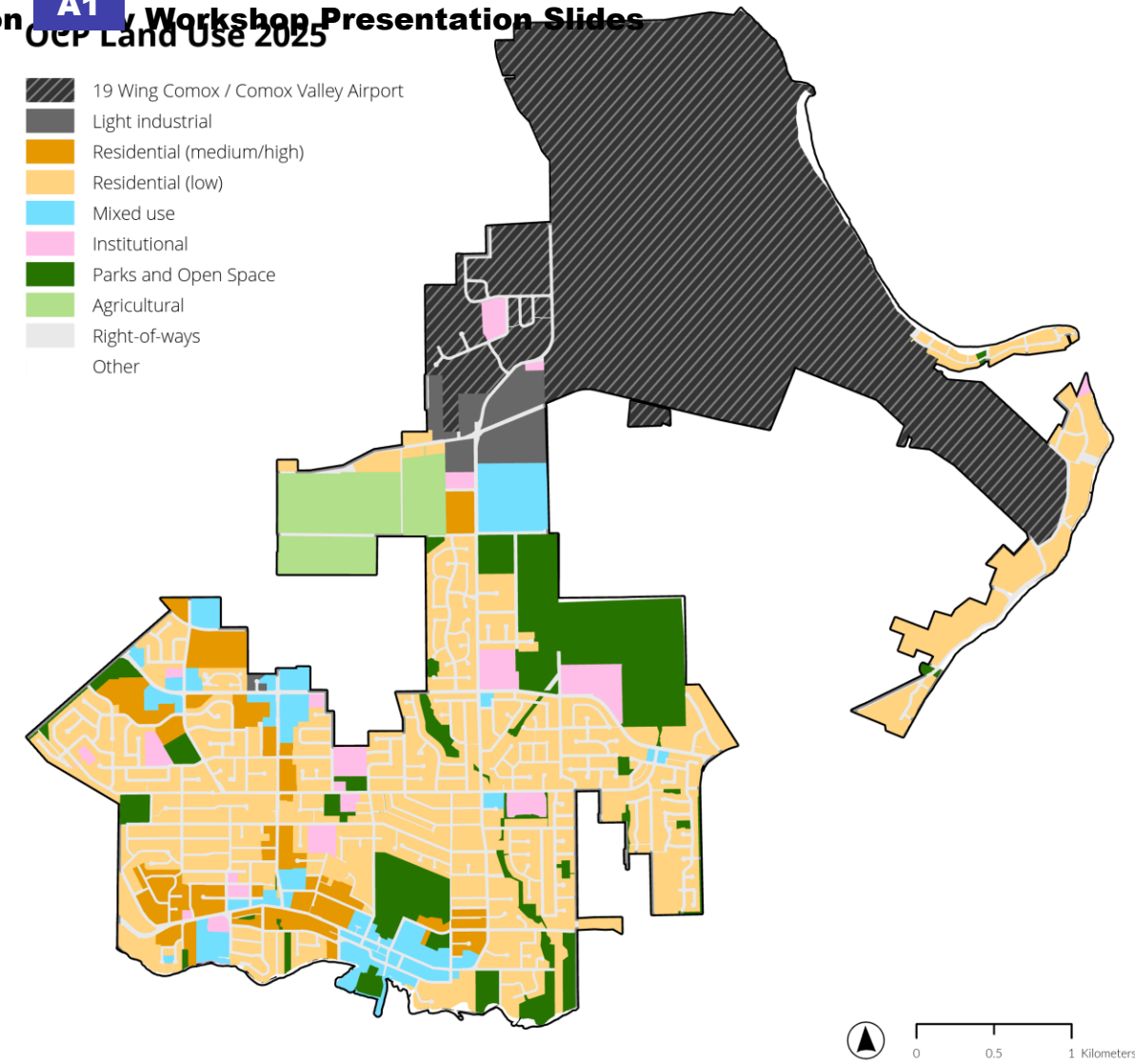


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	19 Wing Comox / Comox Valley Airport	11%

Highest canopy cover

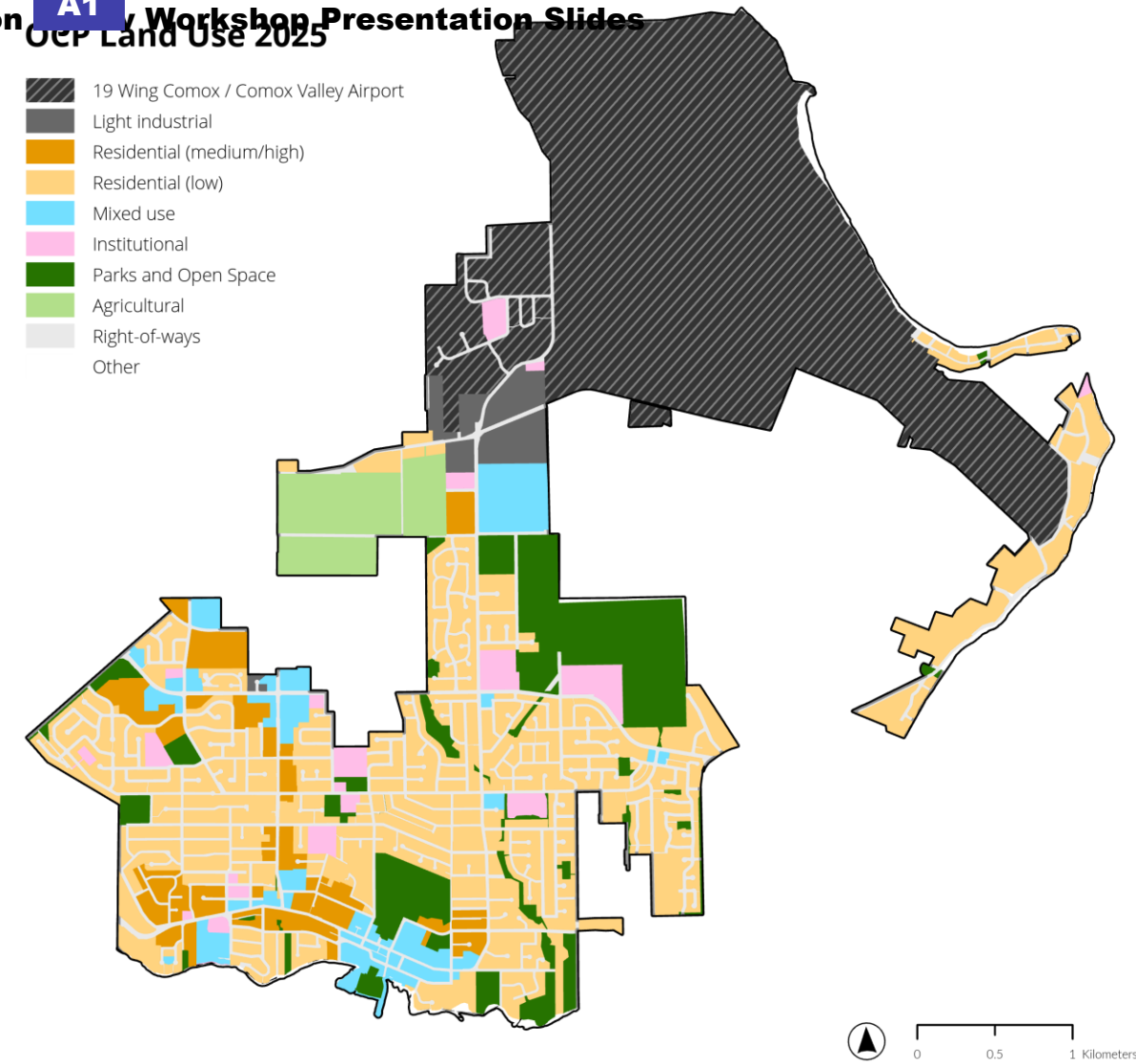


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	Other	15%
	Rights-of-way	15%
	19 Wing Comox / Comox Valley Airport	11%

Land uses Where we expect growth and development



3. What We Heard

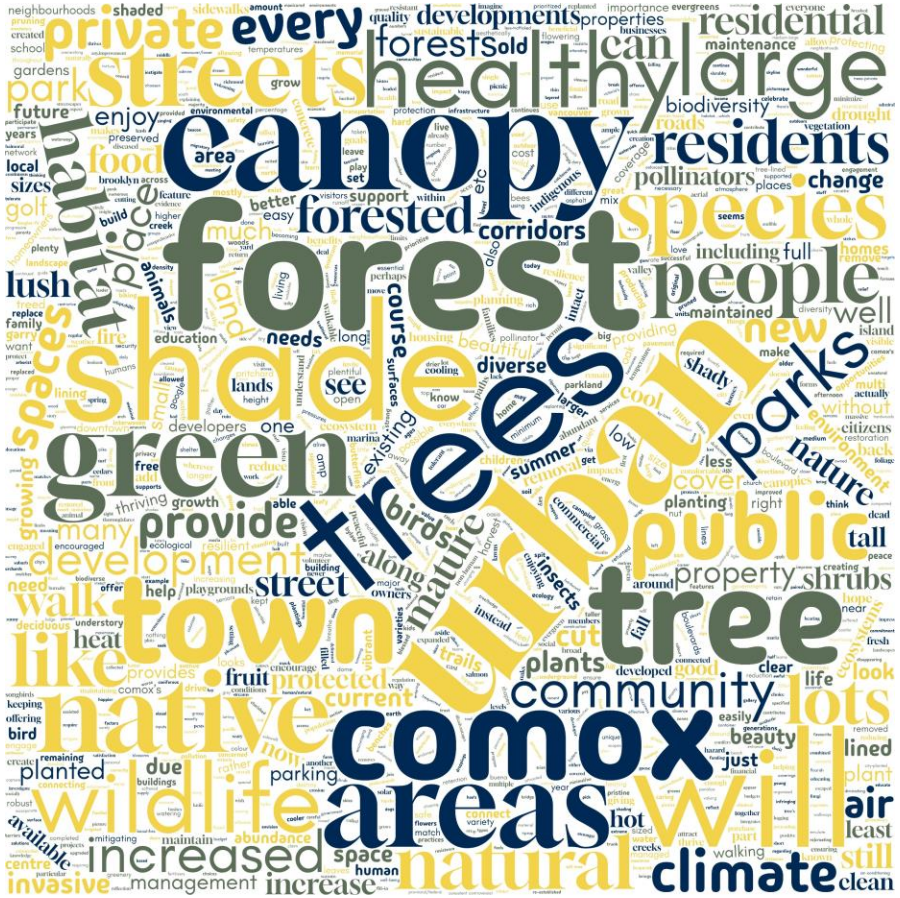
PHASE 1 ENGAGEMENT:

WHO WE HEARD FROM

Date	Engagement Activity	Participants
March 13, 2025	*Public Open House*	55 attendees
March 13, 2025	*Interested Group Workshop*	17 attendees
February 18 - March 31, 2025	*Online Survey*	245 responses
February 18 - March 31, 2025	*Mapping and Ideas Tool*	59 contributors (153 contributions)

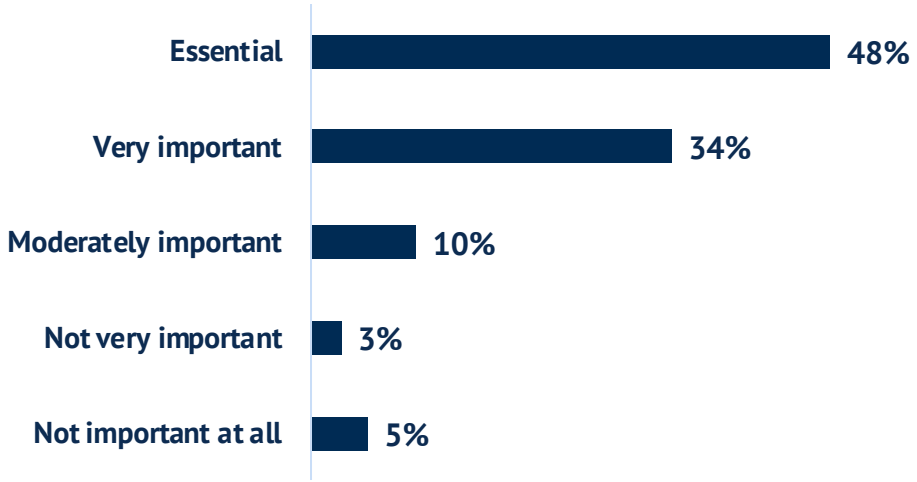




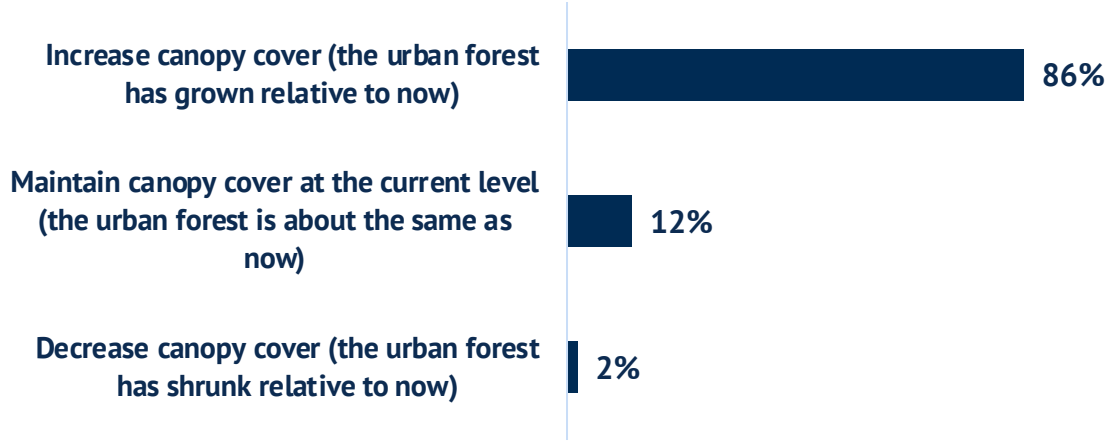


PHASE 1 ENGAGEMENT:
TREE PROTECTION AND CANOPY TARGETS

Q: Importance of protecting trees on private property?



Q: Preference for canopy cover change?

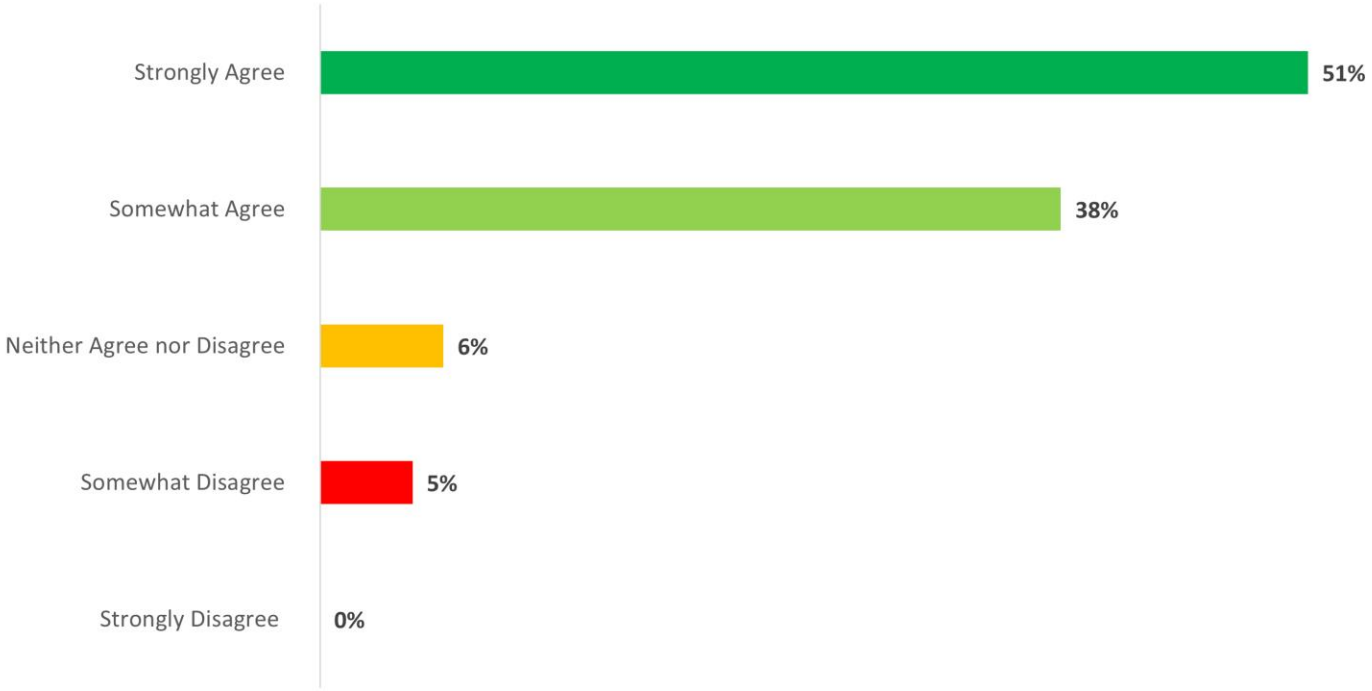


PHASE 2 ENGAGEMENT:
WHO WE HEARD FROM

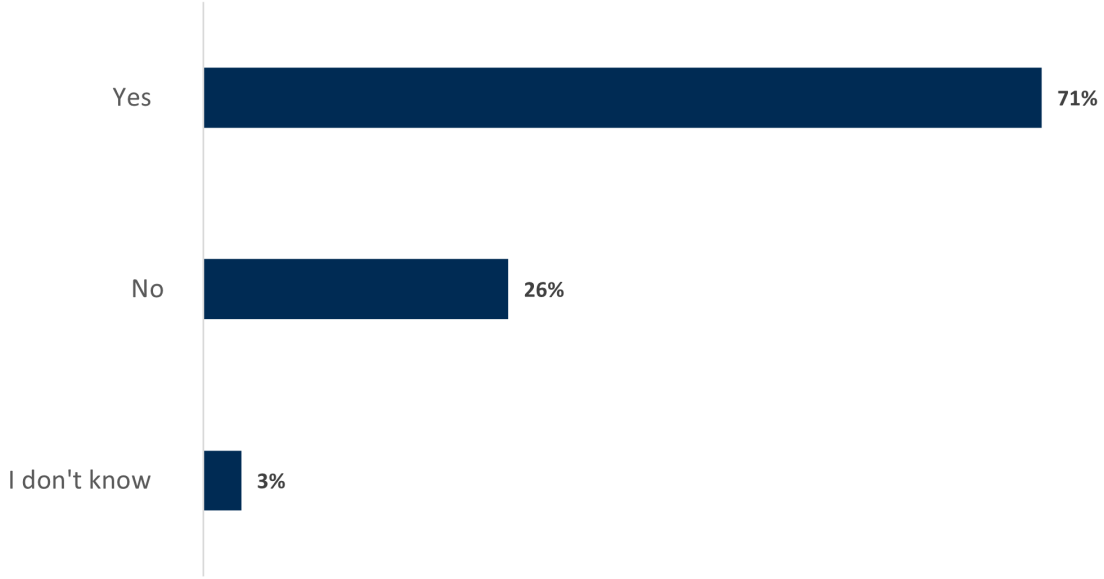
Date	Engagement Activity	Participants
October 16, 2025	Online Public Open House	27 attendees
November 14 – December 19, 2025	Online Survey	63 responses

PHASE 2 ENGAGEMENT:

Q: Support of the urban forest vision?

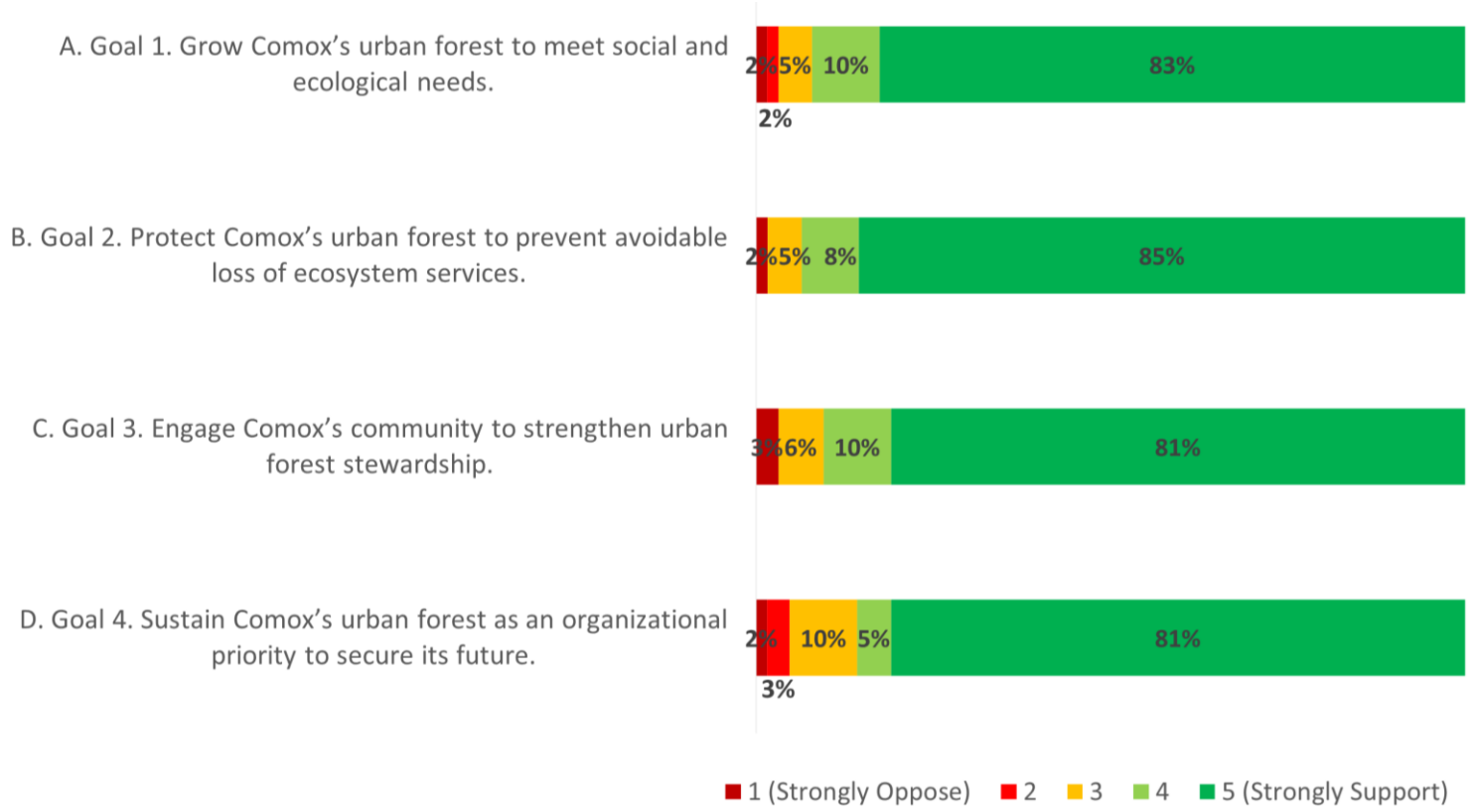


Q: Support of the canopy cover targets?



PHASE 2 ENGAGEMENT:

Q: Support of the goals?



4. Strategic Framework

STRATEGIC FRAMEWORK

Canopy Target



Where we want to go *'the compass'*

How we get there *'the map'*

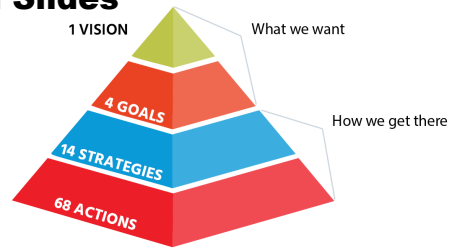
STRATEGIC FRAMEWORK

VISION

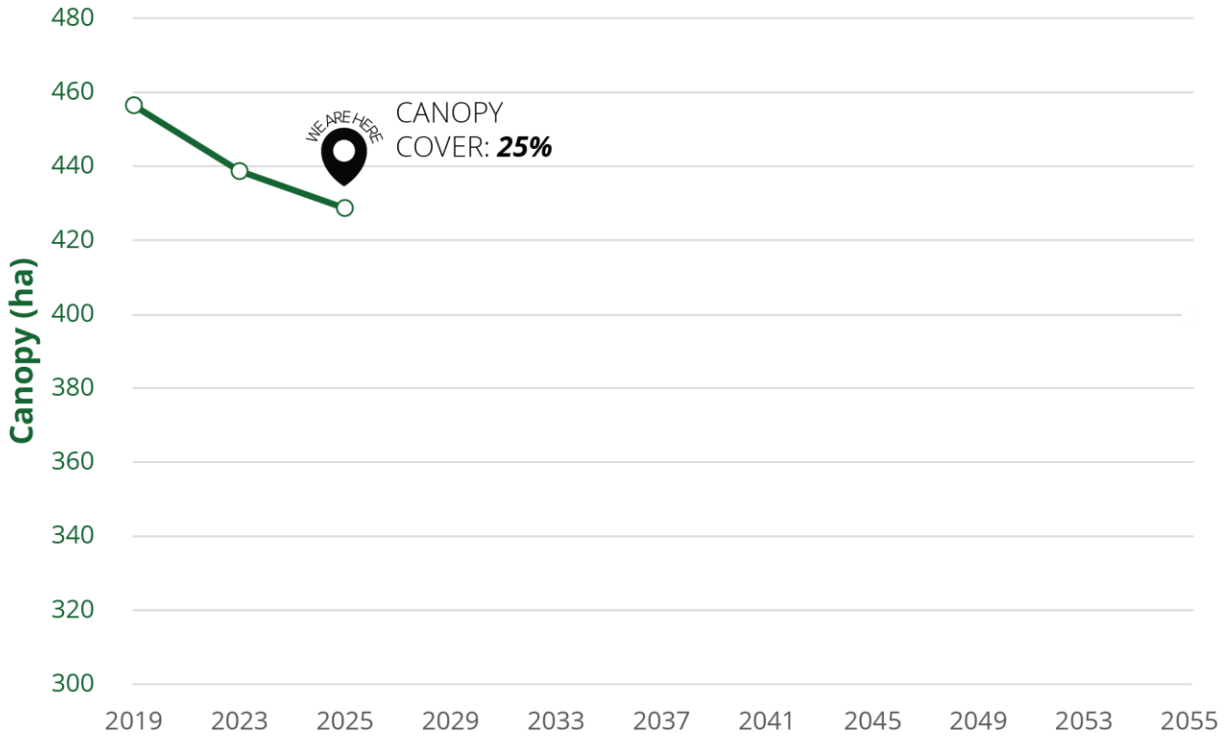
Comox's urban forest is a connected system of treed yards, natural areas, parks, trails, and open spaces that foster healthy and active living. Our urban forest is diverse, equitable, and resilient to the impacts of climate change. Through strong community stewardship, tree protection, and adaptive management, the urban forest and its benefits are safeguarded for the community, ensuring a green future for generations to come.

CANOPY TARGETS

SETUP

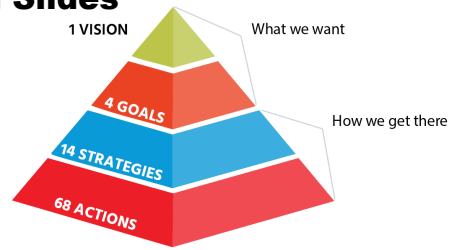


- Past canopy changes
- Current status of canopy
- Projected trends



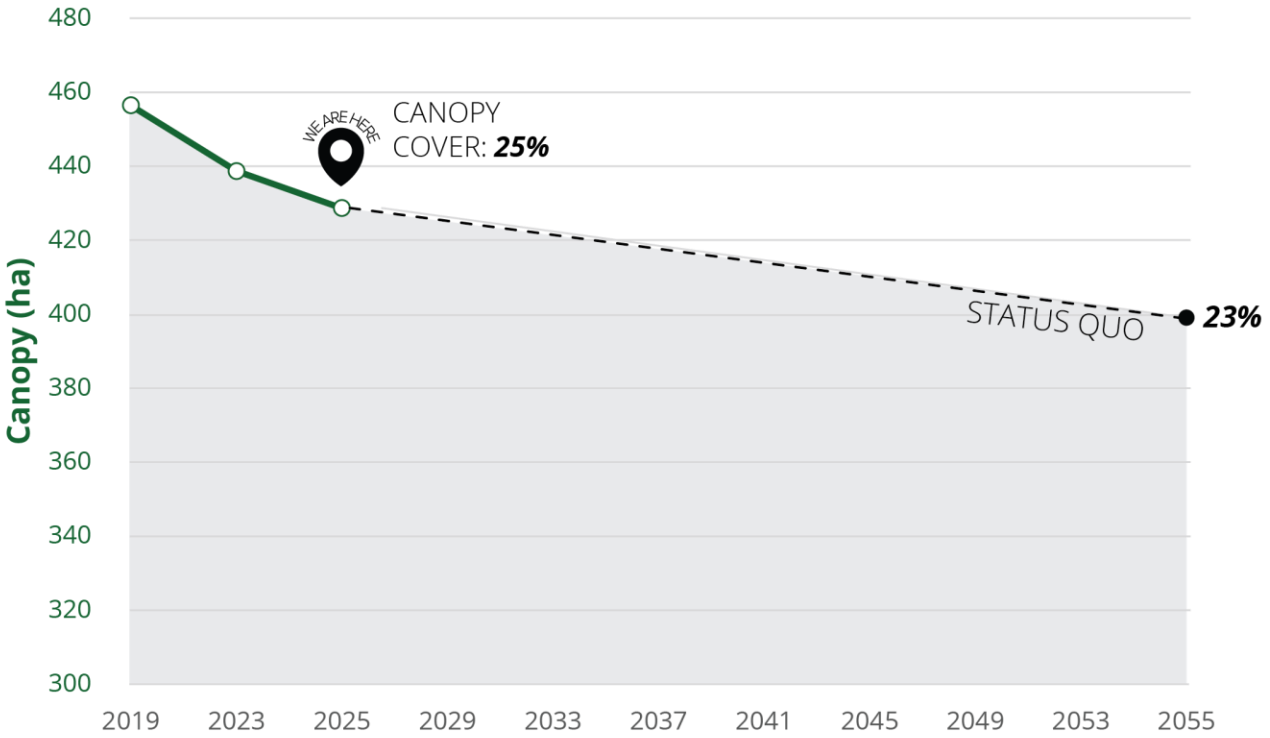
CANOPY TARGETS

STATUS QUO SCENARIO



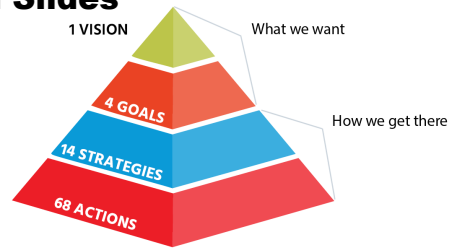
- Past canopy changes
- Current status of canopy
- Projected trends

Scenario 1: Status Quo (-2%)

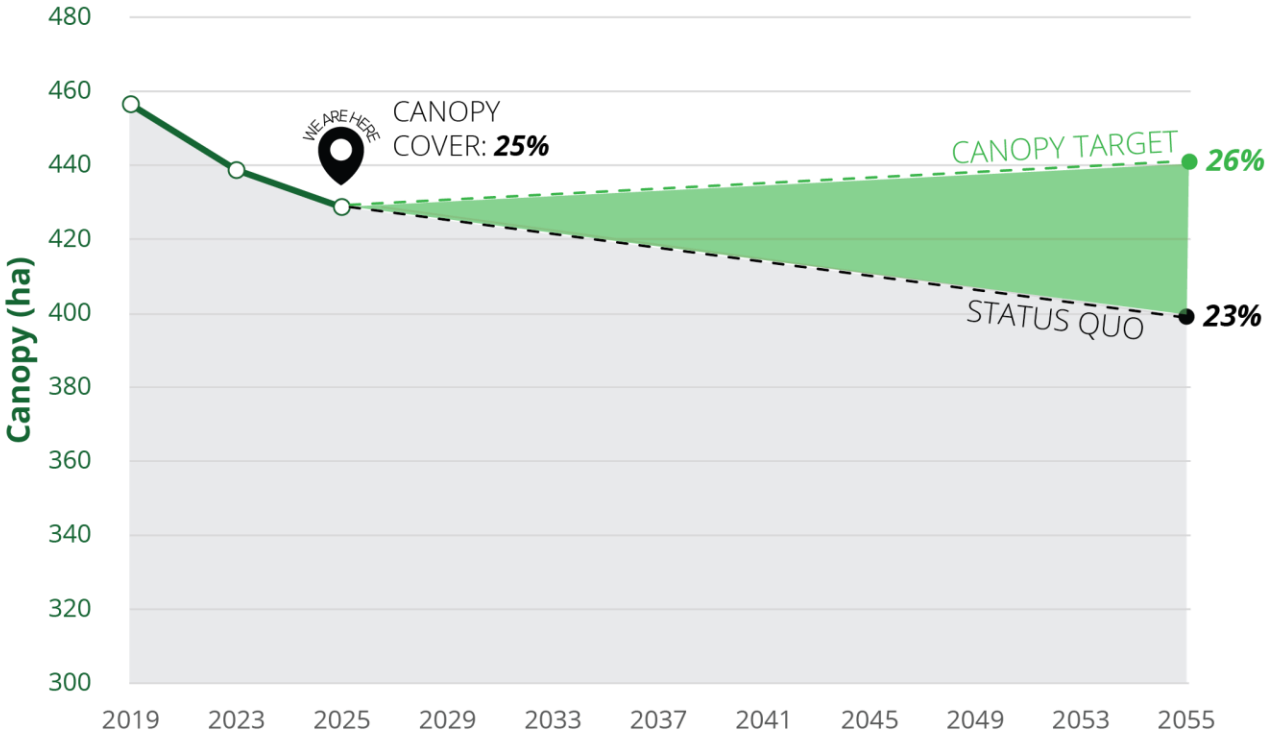


CANOPY TARGETS

UFMS SCENARIO



- Past canopy changes
- Current status of canopy
- Projected trends

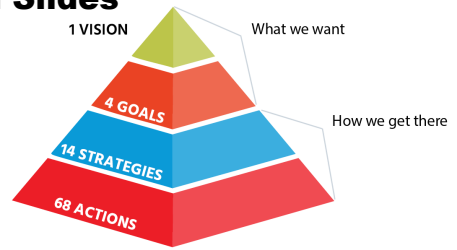


Scenario 1: Status Quo (-2%)

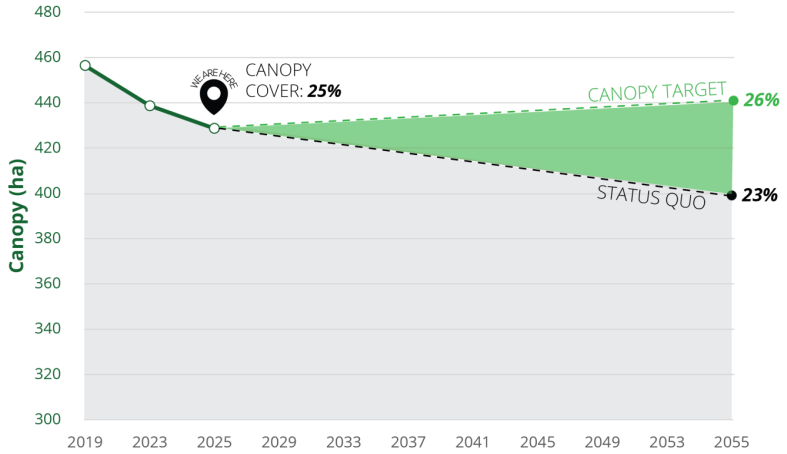
Scenario 2: UFMS (+1%)

CANOPY TARGETS

UFMS SCENARIO

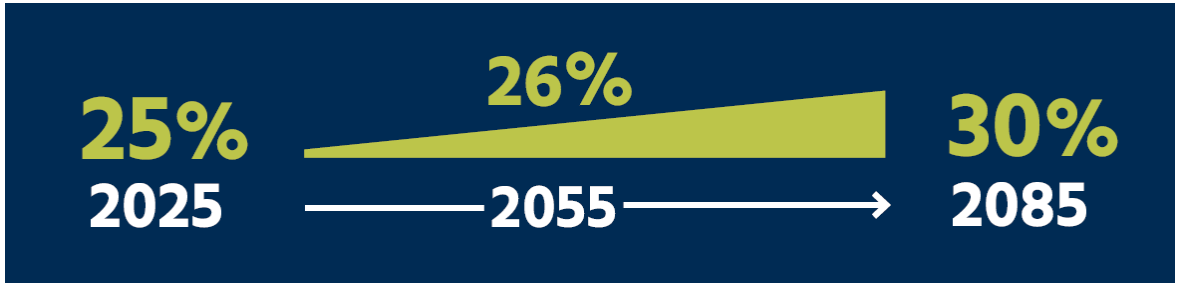


- Past canopy changes
- Current status of canopy
- Projected trends



Scenario 1: Status Quo (-2%)

Scenario 2: UFMS (+1%)

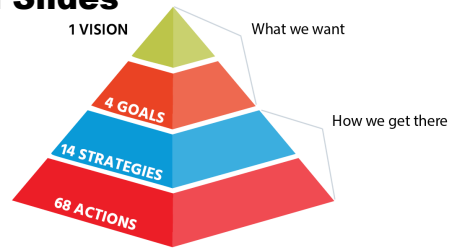


STRATEGIC FRAMEWORK

GOALS

1. **Grow** the urban forest to meet social and ecological needs
2. **Protect** the urban forest to prevent avoidable loss of ecosystem services
3. **Engage** the community to strengthen urban forest stewardship
4. **Sustain** the urban forest as an organizational priority to secure its future

GOAL 1: GROW



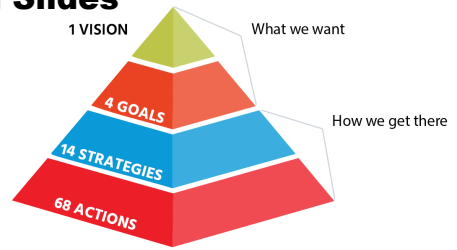
- **Strategy 1** Plant more trees in urban parks and streets, guided by the Tree Planting Master Plan.
- **Strategy 2** Restore degraded natural areas, focusing on areas appropriate for reforestation and low tree equity.
- **Strategy 3** Strengthen tree planting requirements during redevelopment.
- **Strategy 4** Encourage tree planting on private property by local residents and business owners.
- **Strategy 5** Create higher quality planting sites.



Action example: Tree Planting Master Plan (10-year) with:

- 40 street trees per year
- 75 urban park trees per year

GOAL 2: PROTECT



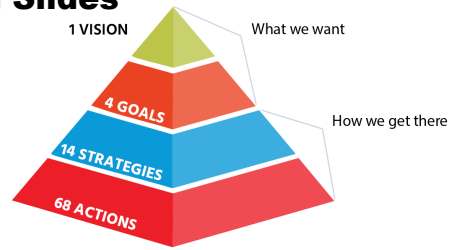
- **Strategy 6** Amend plans and policies to support achieving the UFMS vision and targets.
- **Strategy 7** Extend the Town's oversight of tree cutting and removal through a new Tree Protection Bylaw.
- **Strategy 8** Support tree retention during development.

Action example: Update the **Tree Protection Bylaw** to:

- Apply to all trees on Town lands + subset of trees on private property
- Establish oversight for significant trees
- Require tree protection measures during construction and tree-damaging activities
- Set a minimum 1:1 replacement ratio, with higher ratios for higher-value trees
- Clarify tree protection requirements under Section 219 covenant
- Plan for resourcing in 2026 budget and beyond



GOAL 3: ENGAGE



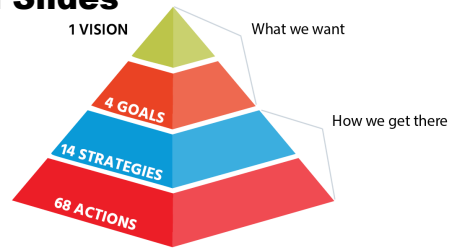
- **Strategy 9** Encourage community participation in UFMS implementation.
- **Strategy 10** Engage K'ómoks First Nation to invite collaboration in urban forest management.

Action example:

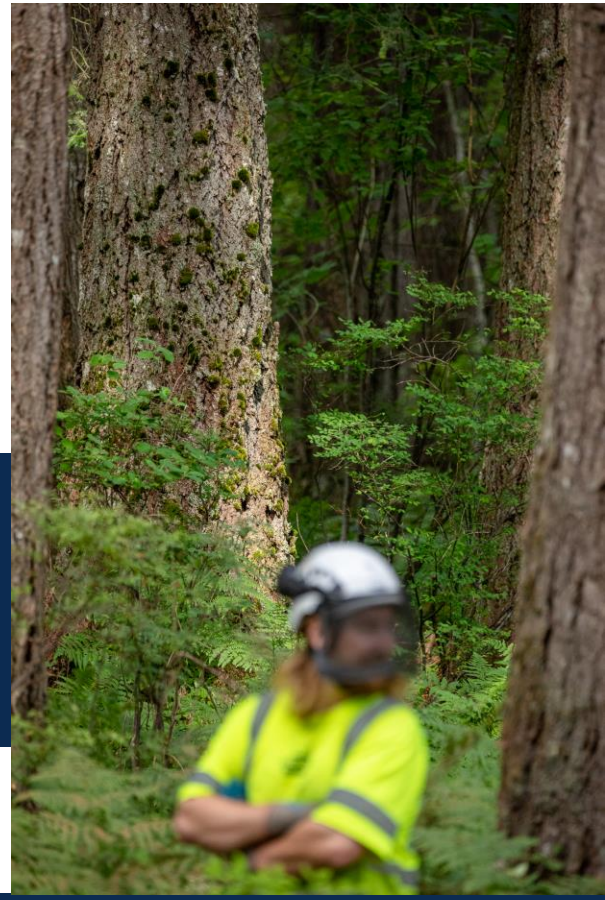
- Prepare a communications and engagement plan to guide stewardship programming and community outreach



GOAL 4: SUSTAIN



- **Strategy 11** Establish an asset management approach for urban forestry.
- **Strategy 12** Document and improve service levels for urban forest assets.
- **Strategy 13** Monitor the urban forest program and adjust management to changing circumstances.
- **Strategy 14** Secure resources and build capacity needed to implement.



Action example:

- Review **staffing capacity** considering new mandates (tree bylaw, development bylaw amendments) to identify additional needs for urban forest program delivery

Questions?

Part B: Tree Protection Bylaw Update

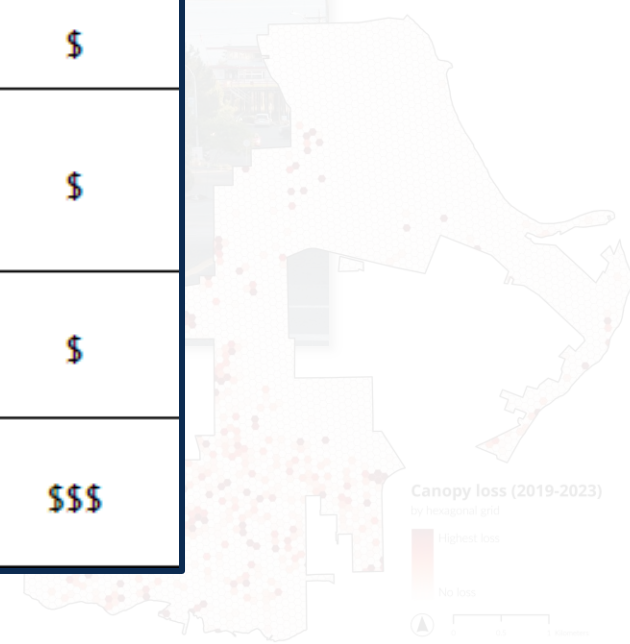


Part B: Tree Protection Bylaw Update

1. Context
2. What We Heard
3. Recommendations
   - **Topic 1** – Size of Regulated Trees (DBH)
   - **Topic 2** – Where the Bylaw Applies
   - **Topic 3** – Reason a Permit Can Be Issued
   - **Topic 4** – Tree Replacement
   - **Topic 5** – Covenants
4. Next Steps

Context

Action	Priority	Timeline	Cost
7a. Replace the current Tree Management and Protection Bylaw with a new bylaw to apply to all trees on Town property and a subset of trees on all private properties.	A	Short	$$
7b. Clarify protection requirements for trees subject to a Section 219 covenant under the Land Act.	A	Short	$
7c. Consider establishing, by bylaw, higher levels of oversight for a class of significant trees in Comox.	A	Short	$
7d. Ensure adequate tree protection measures are installed where trees will be retained on or near construction sites or other sites where tree-damaging activities occur, for the duration of the activities.	A	Short	$
7e. Establish a minimum 1:1 replacement ratio when regulated trees are cut or removed, with higher replacement ratios in place for higher-value trees.	A	Short	$
7f. Consider the resourcing and enforcement requirements of a new bylaw during financial planning for the 2026 fiscal year and following years.	A	Short	$$$



OVERVIEW OF REGULATORY TOOLS FOR TREES

1. **Vision + guidance (higher-level)**
   a. Official Community Plan
   b. Urban Forest Management Strategy
2. **Space for trees (land use)**
   a. Zoning Bylaw
   b. Subdivision and Development Bylaw
3. **Trees (environmental bylaws)**
   a. Development Permit Areas
   b. Tree Bylaw



CORE COMPONENTS OF A TREE BYLAW

- **Values-driven** components:
  - **WHAT is regulated:**
    - Bylaw application
    - Types of trees
  - **HOW it is regulated**
    - Conditions under which trees can be **removed**
    - Requirements to **replace** trees
  - **HOW is it implemented:**
    - Fees, securities, and enforcement approach
    - Administration – who is responsible for permits, referrals, inspections, etc.
- **Best practices** components:
  - Protection during construction
  - Information requirements
  - Arboricultural best practices (e.g., assessing risk, planting replacement trees)

Depend on community values + local context

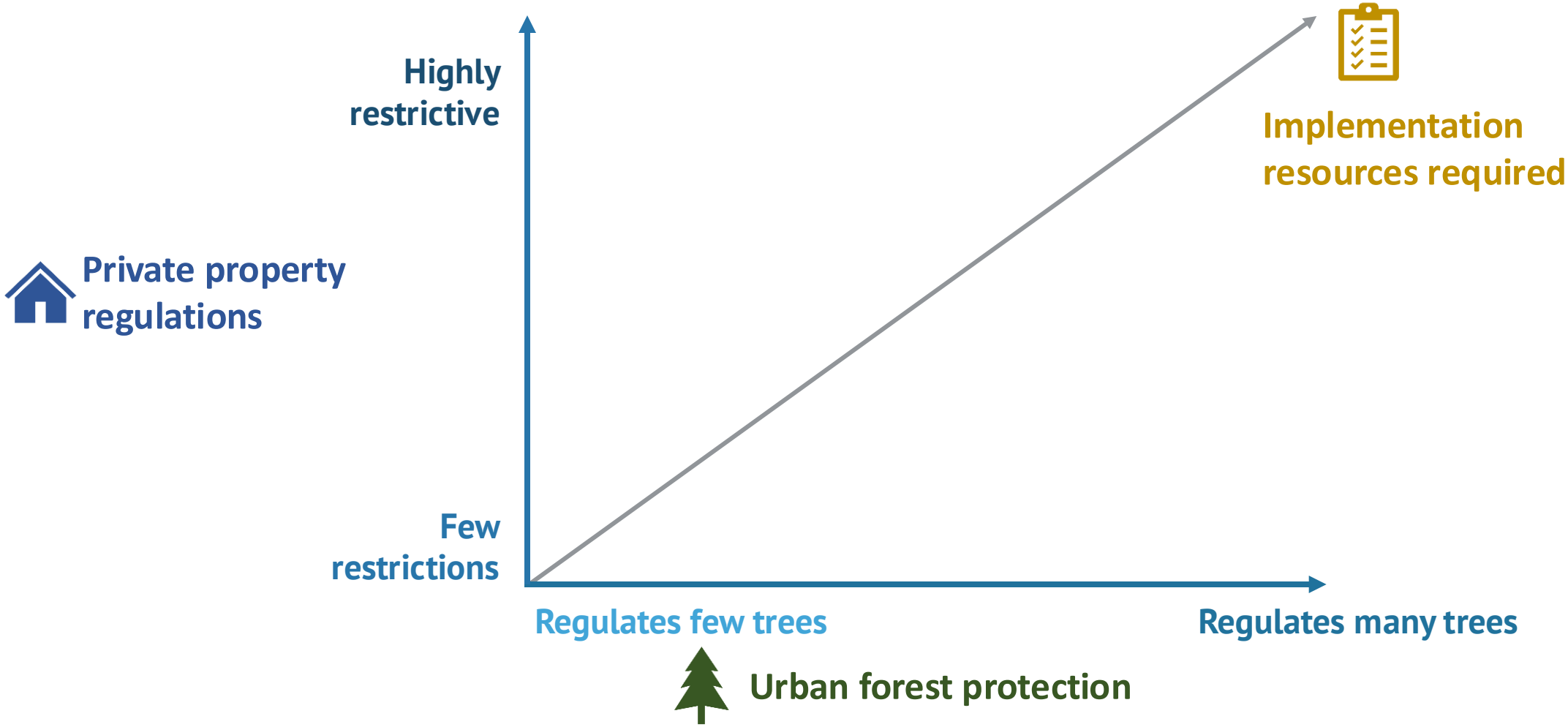
Informed by standards and best practices

CONSIDERATIONS FOR REGULATING TREES

Appropriate level of regulation must consider the desired level of:

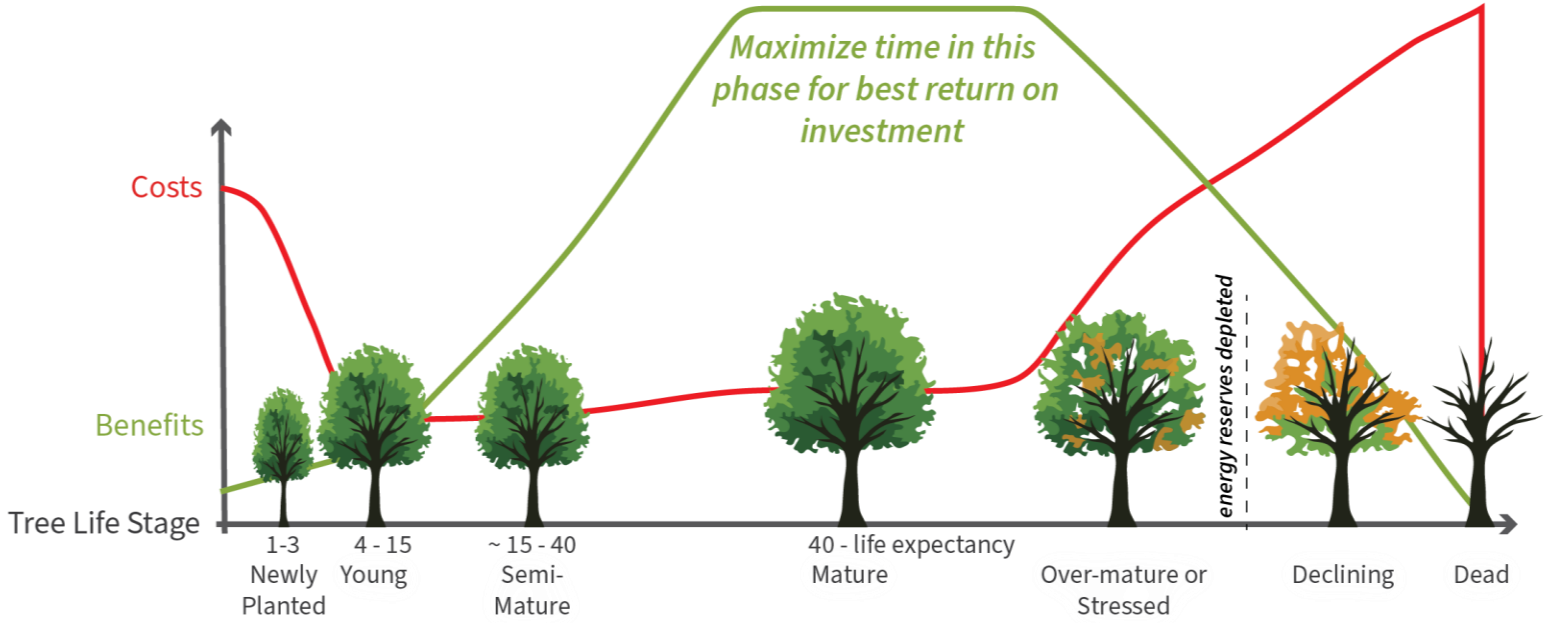
- **Urban forest protection**
- **Private property impacts**
- **Implementation resources**

SUMMARY OF ANTICIPATED IMPACTS



CAN'T I JUST PLANT A NEW ONE?

- Trees require higher costs when they are young, but provide the most benefits when they are mature
- Retaining and protecting mature trees means maximizing return on investment



What We Heard

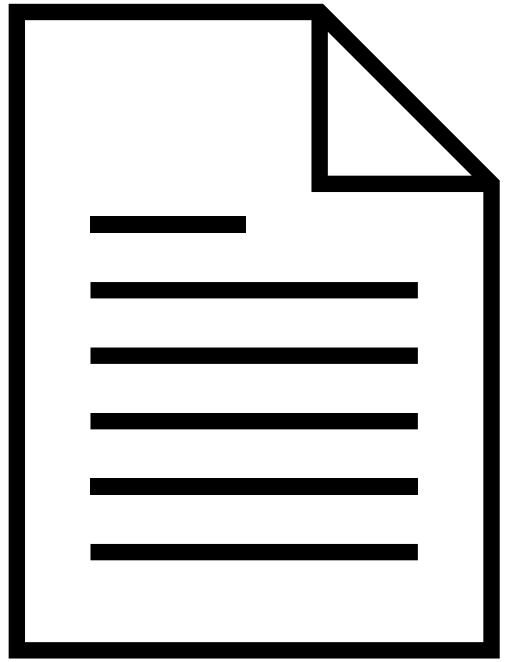
What We Heard From The Community

Phase 2 UFMP + Tree Bylaw engagement included:

Online Survey

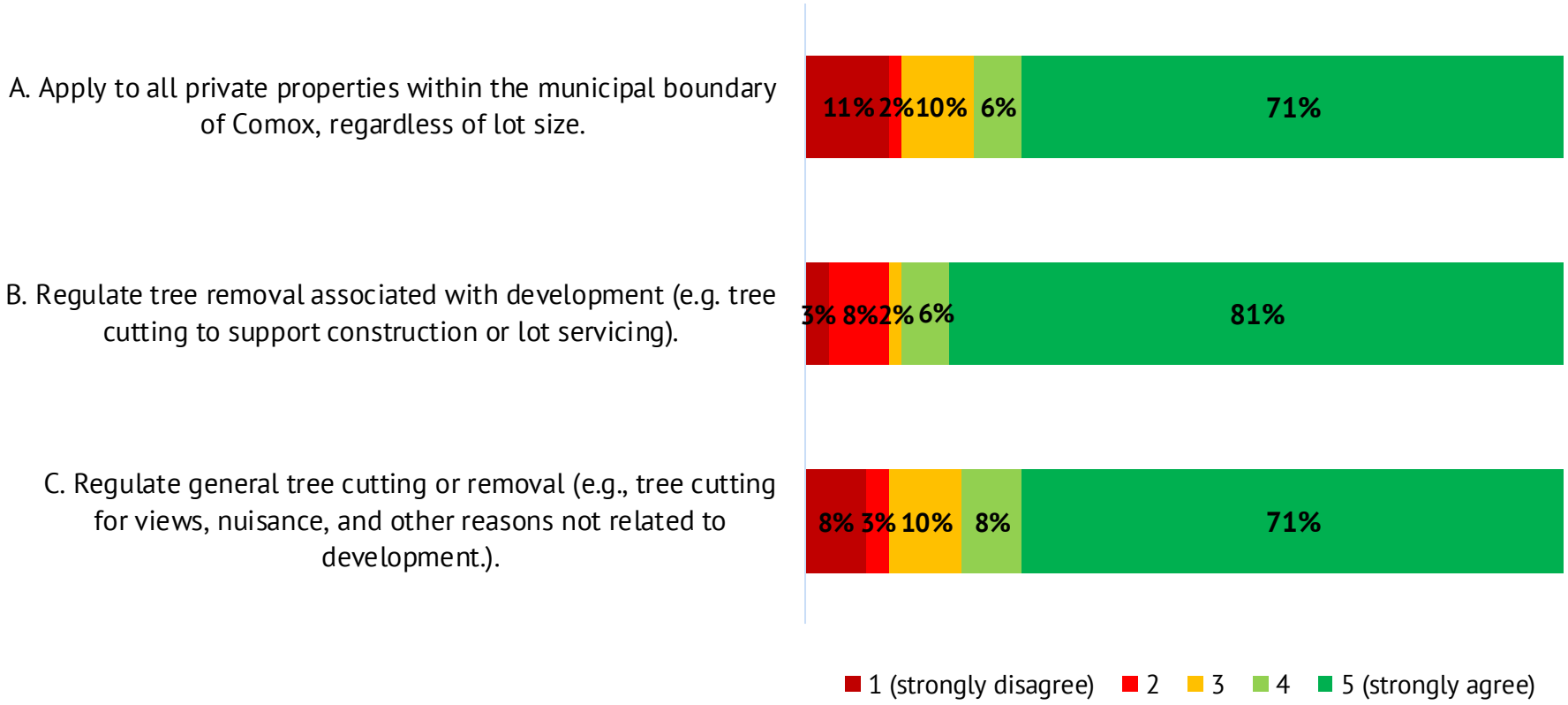
Nov 19 – Dec 19 (2025)

63 respondents



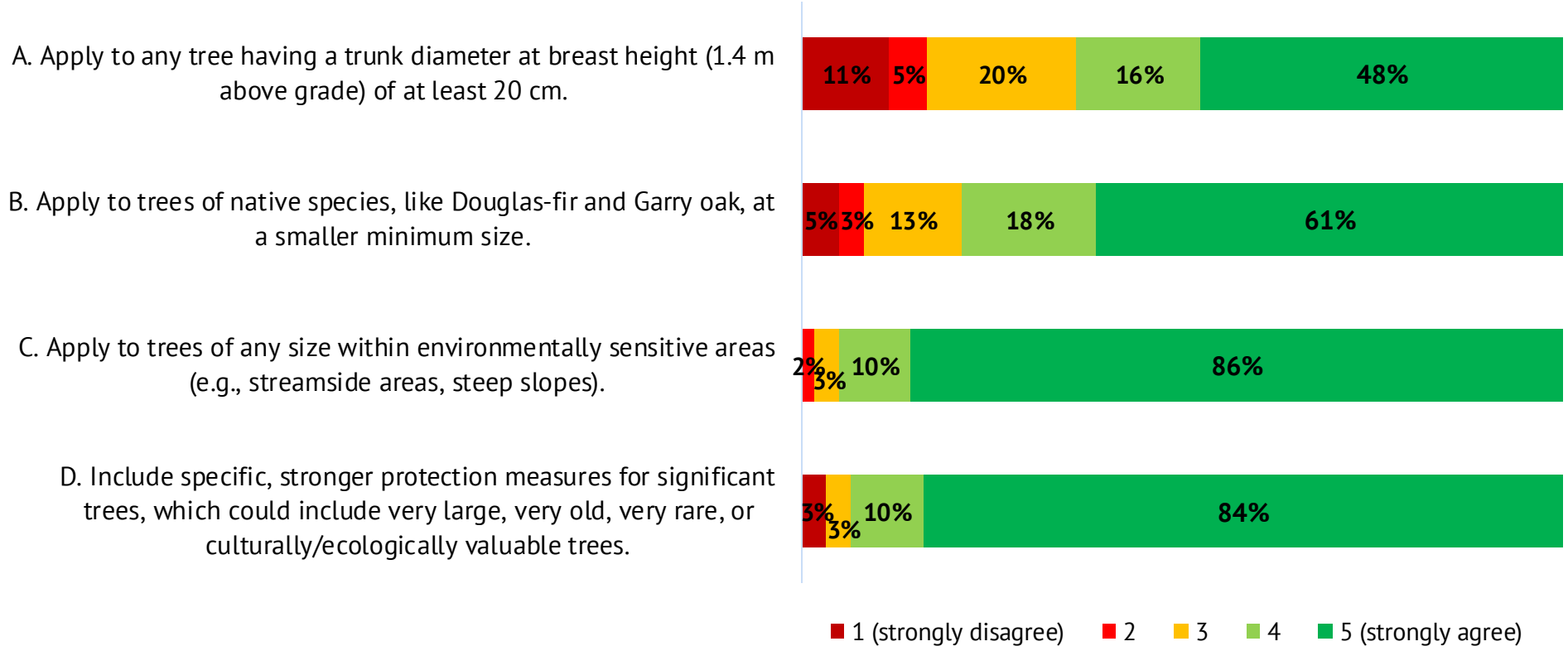
What We Heard From The Community

How and where the bylaw should apply



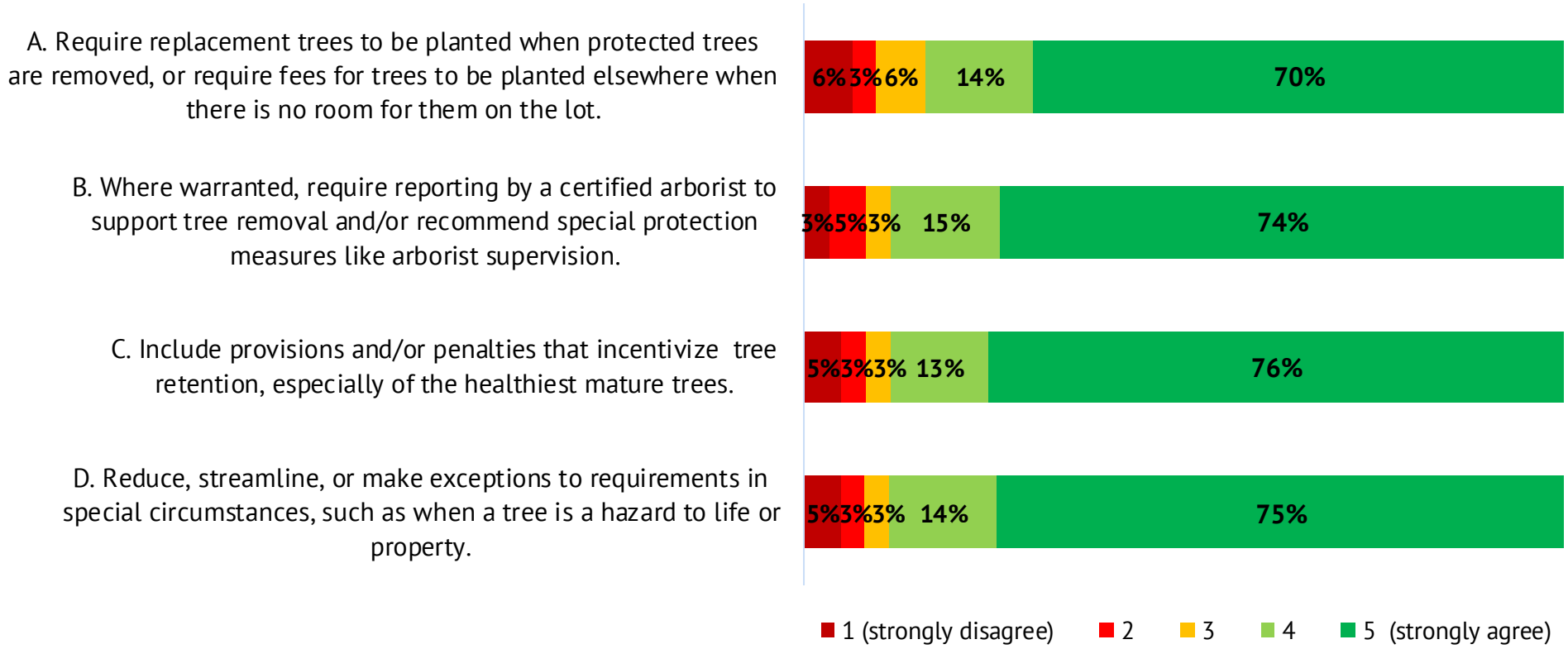
What We Heard From The Community

Types of trees that should be regulated -- "protected trees"



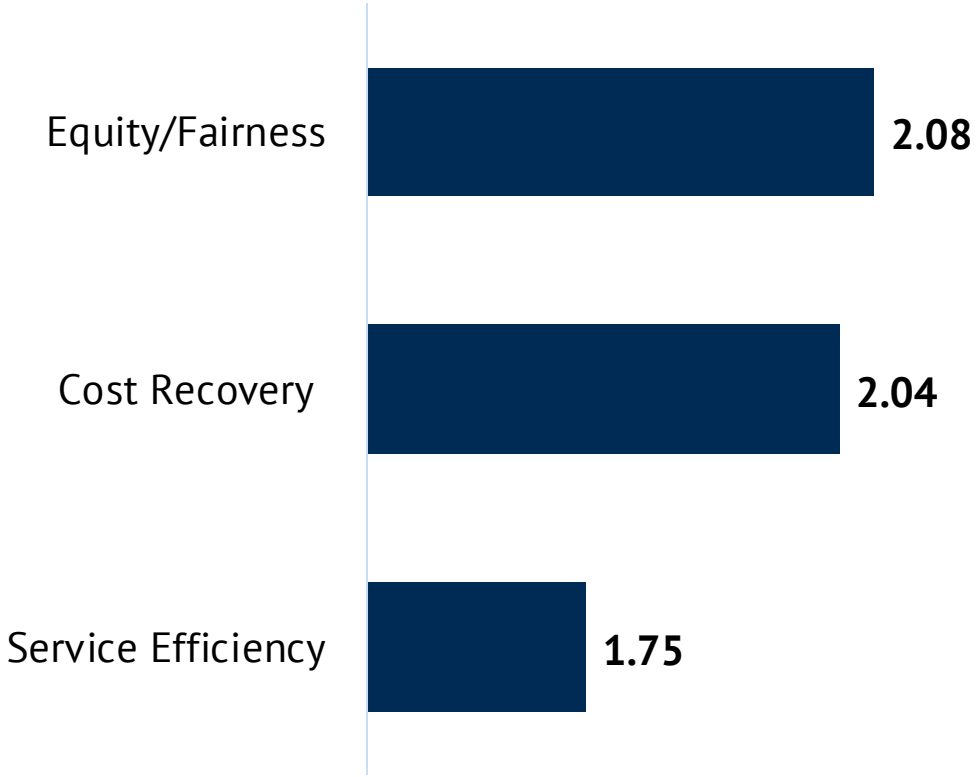
What We Heard From The Community

Objectives for protected trees



What We Heard From The Community

Q: How should implementation of the bylaw should be resourced?



Use lower permit fees for those with less ability to pay; may require higher general taxation to avoid other service cuts.

Use higher fees and penalties to fund the bylaw; may shift costs onto owners with many protected trees that benefit the community.

Reallocate staff before raising fees or taxes; may reduce other services and affect residents and staff in those areas.

Recommendations

- Topic 1 – **Size of Regulated Trees (DBH)**
- Topic 2 – **Where the Bylaw Applies**
- Topic 3 – **Reason a Permit Can Be Issued**
- Topic 4 – **Tree Replacement**
- Topic 5 – **Covenants**

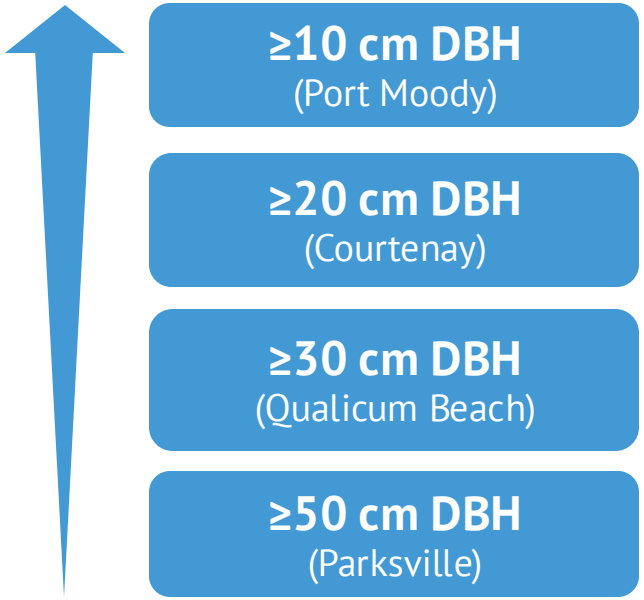
Topics and Council Input

Topic	Council Input
Size of Regulated Trees (DBH)	Appropriateness of: • 20 cm for general regulation • 75 cm for "significant trees"
Where the Bylaw Applies	Consider whether the bylaw should apply across all properties or only on certain lands
Reasons A Permit Can be Issued	Consider whether allowable reasons should be streamed by application type (development/non-development)
Tree Replacement	Consider whether a replacement ratio approach is preferable to an alternate approach for Comox
Covenants	Consider if and under what circumstances existing tree protection covenants should be discharged

Topic 1 – Size of Regulated Trees (DBH)

- Bylaws define how broadly they regulate the urban forest by identifying:
  1. Tree diameter size that defines a **protected tree**

Smaller diameter
(greater proportion of trees regulated)

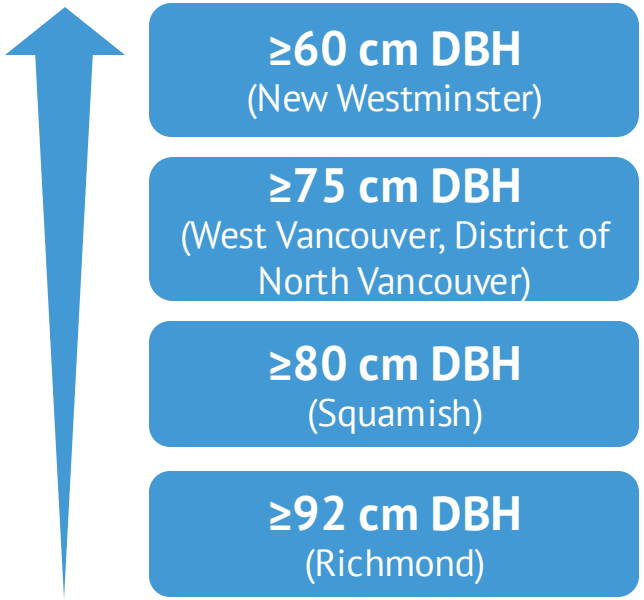


Larger diameter
(smaller proportion of trees regulated)

Topic 1 – Size of Regulated Trees (DBH)

- Bylaws define how broadly they regulate the urban forest by identifying:
  1. Tree diameter size that defines a protected tree
  2. Tree diameter size that defines a **higher value tree**

Smaller diameter
(greater proportion of trees regulated)



Larger diameter
(smaller proportion of trees regulated)

Topic 1 – Size of Regulated Trees (DBH)

- Estimates from the Town's inventory of park and street trees

DBH size threshold	Count of inventory trees protected	Percent of inventory trees regulated
10 cm	2,472	72%
20 cm	1,809	53%
30 cm	1,308	38%
50 cm	708	21%
75 cm	292	9%
80 cm	170	5%

Recommendation – Size of Regulated Trees (DBH)

Town-owned: trees of any size

Private:

- Trees ⩾ 20 cm in diameter
- "**Significant Trees**" ⩾ 75 cm in diameter or identified on a schedule to the bylaw (e.g. significant tree list), except for invasive species.

Council input: appropriateness of 20 cm for general regulation, 75 cm for "significant trees".

Topic 2 – Where the Bylaw Applies

- Bylaw strength can vary based on the types of properties it applies to and whether permits are only required on properties undergoing development.

Most properties affected

Bylaw applies on:
- All private and public property (Courtenay, Qualicum Beach, Vancouver)

Bylaw applies only on:
- Properties undergoing development and in ESAs (Port Moody, Langley City)
- Large properties (>0.5 ha) (Comox, Squamish)

Least properties affected

Recommendation – Where the Bylaw Applies

- Apply the Tree Bylaw on all properties in Comox.

Council input: consider whether the bylaw should apply across all properties (UFMS recommendation, Key Directions Report recommendation) or only on certain lands.

Topic 3 – Reasons A Permit Can be Issued

- Bylaws can place different levels of restriction on tree removal:
  1. **On any property where the bylaw applies**

More restrictions on removal

Trees can only be removed if:
- Tree in Interface Fire Hazard Area
- Infrastructure/utility conflict
- Building conflict
- Inappropriate location
- Hazardous/dead/declining

(Langford)

Trees can be removed for any reason with a permit
(Courtenay, Squamish, Coquitlam)

Few restrictions on removal

Topic 3 – Reasons A Permit Can be Issued

- Bylaws can place different levels of restriction on tree removal:
  1. On any property where the bylaw applies
  2. **During development**

**means it does not sterilize development rights or compromise form and character and is not cost prohibitive*

More restrictions on removal

Trees can only be removed if a **Zoning Bylaw–permitted building*** cannot be reasonably redesigned, relocated, or reshaped to fit on the lot to retain the protected tree
(Surrey, New Westminster)

Trees can be removed for any reason with a permit
(Courtenay, Squamish, Coquitlam)

Few restrictions on removal

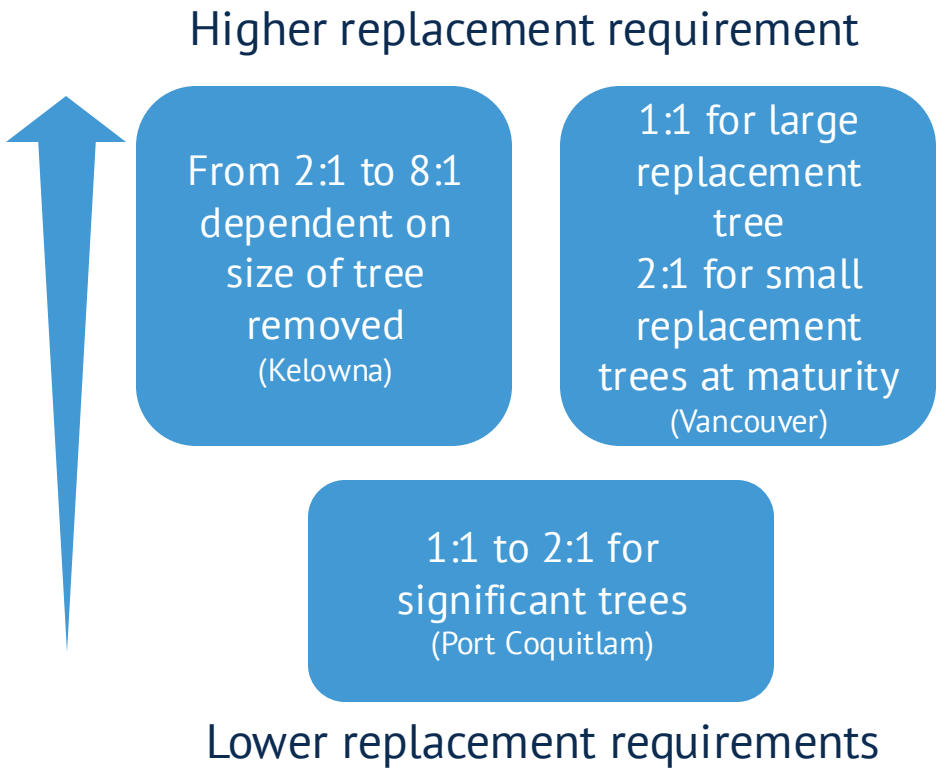
Recommendation – Reasons A Permit Can be Issued

- Reasons for removal:
  - **Not development related:**
    - Protected Trees can be removed for any reason.
  - **Development related:**
    - Protected Trees can be removed only if one of these applies:
      - Dead, unmitigable hazard, wildfire hazard, conflict with approved building footprint, unavoidable conflict with essential site elements, or unmitigable damage (QA-confirmed).
  - **Significant Trees can be removed only if one of these applies:**
    - Dead, unmitigable damage (QA-confirmed), direct building footprint conflict where retention not feasible, or required by other bylaws with no alternative.

Council input: consider whether allowable reasons should be streamed by application type (development/non-development)

Topic 4 – Tree Replacement

- Bylaws usually seek to achieve urban forest replacement with:
  - **Tree replacement ratio**
    - 1:1
    - 1:many
  - Sometimes adjusted based on:
    - **Size of the tree removed** (larger trees removed requiring more replacement trees)
    - **Size of replacement tree species at maturity** (fewer replacement if planting trees larger at maturity)
    - **How many trees are retained on site** (capping the replacements once a site achieves a certain number of trees)



Topic 4 – Tree Replacement (alternate approaches)

- Some bylaws seek to achieve urban forest replacement with:
  - **Tree density target**
    - Target number of trees per unit area that applicants are required to achieve after the tree removal takes place.
  - **Canopy cover target**
    - Canopy cover target that applicants must achieve on the lot after the tree removal takes place

50 trees per hectare
(Courtenay)

Canopy target by land use:
- 20% for Multi Unit Residential
- 50% for Community Institutional Zoning
(District of Oak Bay)

Recommendation – Tree Replacement Ratio

Encourage replacement trees that are large at maturity

- For each **Protected Tree** removed:
  - **1:1** ratio if the replacement tree is a **large canopy** species at maturity
  - **2:1** ratio if the replacement trees are a **medium canopy** species at maturity
  - **4:1** ratio if the replacement trees are a **small/fastigiate canopy** species at maturity

- For each **Significant Tree** removed:
  - **2:1** ratio if the replacement tree is a **large canopy** species at maturity
  - **4:1** ratio if the replacement trees are a **medium canopy** species at maturity
  - **8:1** ratio if the replacement trees are a **small/fastigiate canopy** species at maturity

***Cash-in-lieu**: Reflective of the Town's cost to acquire, install and maintain the replacement tree(s) to establishment.*

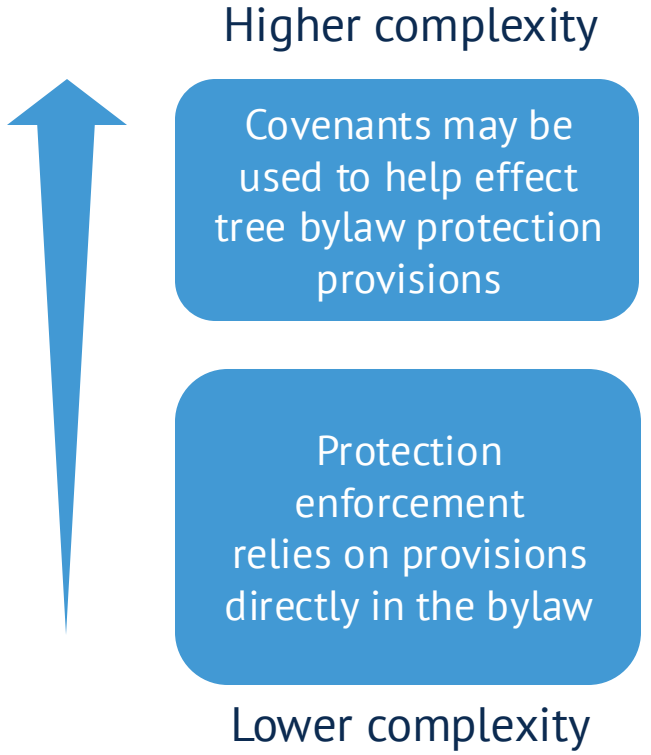
Recommendation – Tree Replacement Ratio

Council input: consider whether a replacement ratio approach is preferable to an alternate approach for Comox.

Topic 5 – Covenants

- **Current**
  - Several hundred trees are currently protected on private property under Section 219 covenants entered during the development process.
  - These covenants will continue to apply until discharged.

- **Future**
  - Relying on the tree bylaw for first-line tree protection is the preferred direction of staff.
  - If existing covenants are to be discharged, without affecting the protection of affected trees, the affected trees would need to be addressed specifically by the tree bylaw.



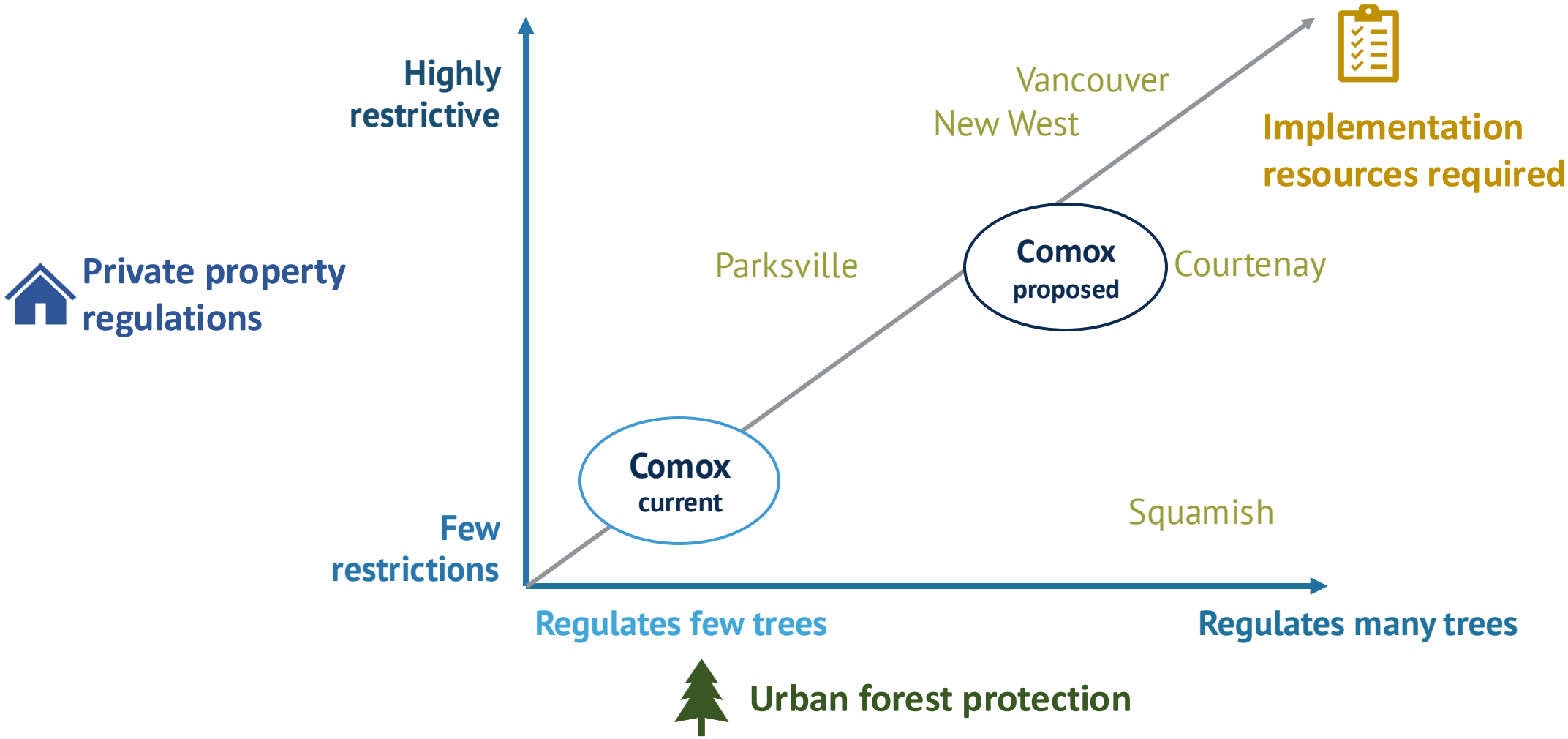
Recommendation – Covenants

Transition towards tree bylaw

- Discharge all existing tree protection covenants for Single Family parcels and enforce provisions within the new updated tree bylaw
- Discourage the use of new tree protection covenants and increase reliance on enforcement provisions directly in the tree bylaw.
  - Could include "covenant tree" definition
  - Could include Council-approved schedule covenant trees are migrated to

Council input: consider if and under what circumstances existing tree protection covenants should be discharged.

Summary of Anticipated Impacts



Next Steps

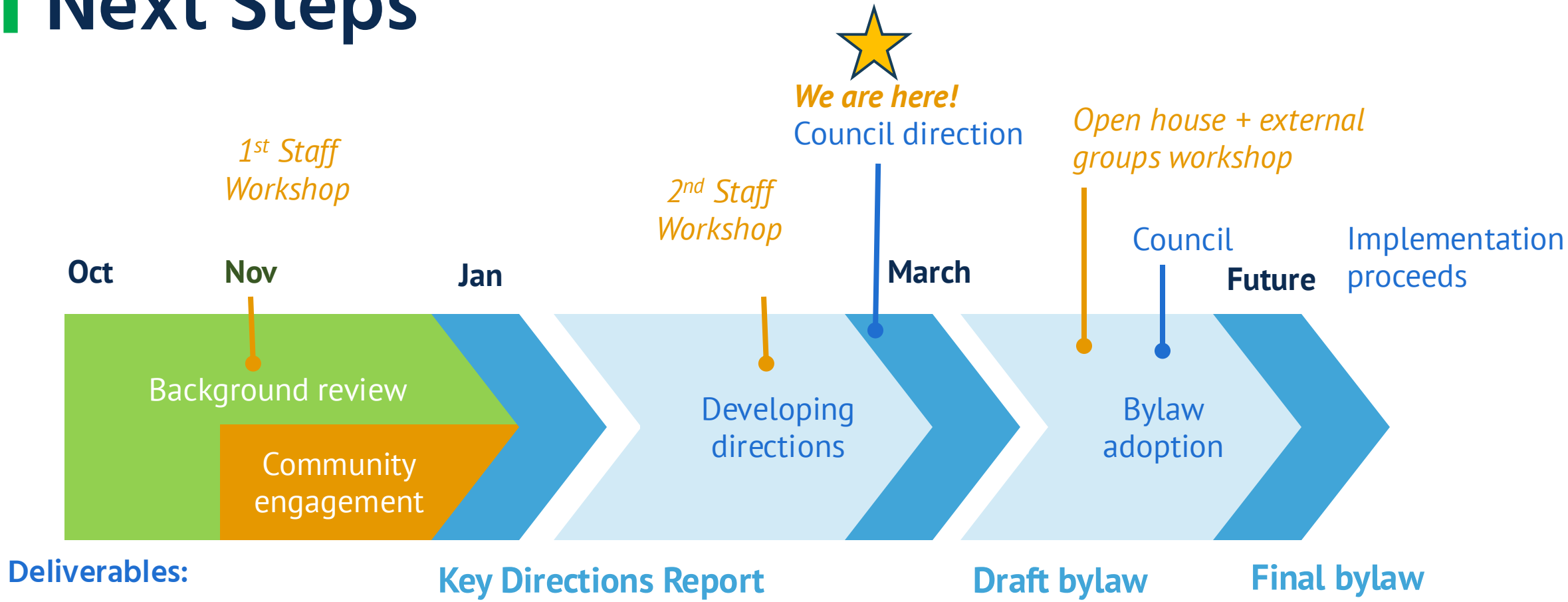
Next Steps

- Seek Council feedback on Key Directions
- Prepare draft Tree Bylaw language

Upcoming Engagement Events:

- External Groups Workshop (April 1st)
- Public Open House (April 8th)

Next Steps


We are here!
Council direction
1st Staff Workshop
2nd Staff Workshop
Open house + external groups workshop
Council
Implementation proceeds
Oct
Nov
Jan
March
Future
Background review
Community engagement
Developing directions
Bylaw adoption
Deliverables:
Key Directions Report
Draft bylaw
Final bylaw

Review: Topics and Council Input

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Questions?