

# THE REGIONAL STANDARD: Metro Vancouver Urban Forest Bylaw Comparison

TriCities Urban Forest Working Group | March 2026 | Surrey · West Vancouver · Port Moody · Burnaby · Coquitlam

## Overview: A Region Moving in One Direction

In the past 24 months, three Metro Vancouver municipalities — West Vancouver, Port Moody, and Vancouver — have adopted or are actively reforming their tree bylaws in direct response to recently completed urban forest management strategies. Surrey has maintained a comprehensive bylaw since 2006 and tightened its processes in 2025. Burnaby adopted its first Urban Forest Strategy in May 2025 and committed in writing to bylaw reform as Action 7.1 — and yet six months later a councillor had to file a public motion to force movement on it. Every city reviewed has the same essential architecture: a size-based protection threshold that applies to development sites without exemption, mandatory professional assessment, mandatory replacement requirements with cash-in-lieu backup, a dedicated reserve fund, and significant/heritage tree designation backed by meaningful penalties.

Coquitlam's Tree Management Bylaw (No. 4091, 2010) contains a 20 cm DBH protection threshold — but it is systematically neutralized by exemptions in Section 12 that exclude the annual 2-tree removal allowance from permit requirements and, critically, exempt all protected trees on development-application sites within approved neighbourhood plan areas. Since the permit is the mechanism that triggers professional assessment and mandatory replacement, these exemptions mean that most tree removal in Coquitlam — particularly from development — occurs entirely outside the protective framework. As far as we're aware, Coquitlam's UFMS -- currently in development with a draft expected in April 2026 -- proposes no reform to this structure.

This document provides a full five-city comparison of Tree Bylaws enacted and revised by Coquitlam's regional neighboring Cities.

A NOTE ON COQUITLAM'S BYLAW: The characterization throughout this document reflects a careful reading of Bylaw 4091, 2010. The bylaw does contain a 20 cm DBH protection threshold (s.3). However, Section 12 exemptions remove the practical effect of that threshold for (a) up to 2 protected trees per year on any residential lot (s.12b), (b) all protected trees on development-application sites within approved neighbourhood plan areas (s.12d), and (c) all trees within building envelopes once a development application is approved (s.12e). References in this document to Coquitlam's bylaw as 'unenforced' or 'hollowed out' refer specifically to these exemptions, which are verifiable in the text of the bylaw.

## Table 1 — Six-City Bylaw Comparison (Surrey · West Vancouver · Port Moody · Burnaby · Coquitlam)

Column shading: Blue = Surrey; Purple = West Vancouver; Green = Port Moody; Orange = Burnaby; Red = Coquitlam gaps. Amber = partial protection only.

| POLICY ELEMENT              | SURREY<br>Bylaw 16100 (2006, updated 2025)  | WEST VANCOUVER<br>Bylaw 4892 (4-bylaw pkg Nov 2025)                     | PORT MOODY<br>Bylaw 3531 (adopted Feb 2026)                                | BURNABY<br>Bylaw 10482 (1996, updated 2014)<br>Bylaw update pending (Action 7.1)  | COQUITLAM<br>Bylaw 4091 (2010) — unamended<br>No reform proposed in UFMS  |
|-----------------------------|---|---|--|---|---|
| <b>Bylaw in force since</b> | Bylaw 16100, 2006. Amended 17+ times through 2025. Substantially strengthened with each revision. | Bylaw 4892, 2016. Four-bylaw coordinated package adopted November 2025. | Bylaw 2961, 2015. Fully replaced by Bylaw 3531, adopted February 24, 2026. | Bylaw 10482, 1996. Substantively updated 2014 (27 amendment bylaws in total). No major update since 2014. Action 7.1 of 2025 UFMS commits to update — still pending as of March 2026. | Bylaw 4091, 2010 (replaced Bylaw 3855, 2007). No substantive amendment in 15 years. No reform proposed in current UFMS process. |

| <b>POLICY ELEMENT</b>                                | <b>SURREY</b><br>Bylaw 16100 (2006, updated 2025)   | <b>WEST VANCOUVER</b><br>Bylaw 4892 (4-bylaw pkg Nov 2025)   | <b>PORT MOODY</b><br>Bylaw 3531 (adopted Feb 2026)  | <b>BURNABY</b><br>Bylaw 10482 (1996, updated 2014)<br>Bylaw update pending (Action 7.1)  | <b>COQUITLAM</b><br>Bylaw 4091 (2010) — unamended<br>No reform proposed in UFMS   |
|--|---|--|---|--|---|
| <b>General protection threshold</b>                  | 30 cm DBH city-wide. No permit exemptions for routine residential removals.   | 75 cm DBH city-wide (general); 20 cm DBH on any parcel under active building or development permit.  | 30 cm DBH city-wide; 10 cm DBH for six named native species, ESAs, and riparian zones.  | Non-development properties: 30 cm DBH (conifers); 45 cm DBH (broadleaf/deciduous). No annual 'free removal' exemption — permit required for all protected tree removals regardless of context.   | 20 cm DBH city-wide on paper (s.3, Bylaw 4091) — but s.12(b) exempts up to 2 protected trees per year per lot with no permit, no assessment, and no replacement. Since the permit is the mechanism that triggers replacement obligations, these removals effectively have no threshold in practice.   |
| <b>Development-triggered threshold / protections</b> | 30 cm DBH (same as general). All development-site removals require permit, arborist report, and 2:1 replacement. Securities required for retained trees.  | 20 cm DBH threshold activated automatically on any parcel with an active building permit or development permit; remains active until all building permit work is complete.             | 10 cm DBH on all properties subject to a development application — the strongest development-site threshold in the region.            | 20 cm DBH on all properties subject to a development application. No blanket exemptions for development-site tree removal — every protected tree requires a permit. Mandatory replacement on all development permits.                      | No enhanced protection for development sites. s.12(d) exempts ALL protected trees on development-application properties within approved neighbourhood plan areas from the permit requirement entirely. s.12(e) additionally exempts all trees within the building envelope once an application is filed. These two exemptions together cover the vast majority of development-driven tree loss, entirely unregulated. |
| <b>Native / significant species protection</b>       | Arbutus, Garry Oak, Coast/Dawn/Giant Redwood, Ginkgo — protected at small sizes below the general 30 cm threshold (3m tall conifer or 5cm caliper deciduous).   | Arbutus, Garry Oak, Pacific yew, Pacific dogwood, Yellow cedar, Shore pine (shoreline area) — protected at 20 cm DBH.  | Arbutus, Cascara, Pacific dogwood, Pacific yew, Shore pine, Western white pine — protected at 10 cm DBH, below the general threshold. | No species-specific reduced thresholds in current bylaw. Native species protected at the general thresholds only (30 cm conifer / 45 cm deciduous off-site). Action 7.1 of the 2025 UFMS is expected to address this gap.                  | None. Native species receive no additional protection below the general 20 cm threshold, and are fully subject to the s.12(b) annual exemption and the s.12(d)/(e) development exemptions.  |
| <b>Riparian / ESA / watercourse protection</b>       | Riparian area trees protected at any size. Permit refusal authority preserved in sensitive areas.   | Watercourse Protection Area: 15m from top of bank (permanent watercourses); 5m (non-permanent). All trees in these zones protected regardless of size.                                 | 10 cm DBH threshold applies in all ESAs and Riparian Management Zones — stronger than the general city-wide threshold.                | Trees within SPEA (Streamside Protection and Enhancement Area as defined in Zoning Bylaw s.6.23) are protected at any size, regardless of DBH. No additional threshold reduction.  | SPEA referenced in bylaw — s.5 requires a permit for cutting in SPEA and steep slopes. However, the general 20 cm threshold applies with no enhanced threshold below it, and the s.12(b) annual exemption remains available within SPEA (only genuine emergency removal is carved out separately).  |
| <b>Professional assessment required</b>              | Yes — mandatory ISA-certified arborist report for all hazard, specimen, topping, and development-site removals. Report valid 2 years. City may retain independent arborist at owner's cost if report is found inaccurate. | Yes — arborist report required. New 2025 requirement: applicant must explain in writing why pruning cannot solve the problem before removal is approved. Burden of proof on applicant. | Yes — mandatory arborist report for all permit applications. Must confirm alternatives to removal have been considered.               | City arborist reviews all permit applications. For development sites, tree plan by a Qualified Professional required as part of application. Permit criteria evaluated against health, structural soundness, and feasibility of retention. | Discretionary. s.7: 'The General Manager may require' an arborist report, retention/cutting plan, or QTE report. Not mandatory. Not required for the s.12(b) annual exemption or the s.12(d)/(e) development exemptions — which together cover most actual removal activity.  |

| <b>POLICY ELEMENT</b>                                     | <b>SURREY</b><br>Bylaw 16100 (2006, updated 2025)   | <b>WEST VANCOUVER</b><br>Bylaw 4892 (4-bylaw pkg Nov 2025)  | <b>PORT MOODY</b><br>Bylaw 3531 (adopted Feb 2026)   | <b>BURNABY</b><br>Bylaw 10482 (1996, updated 2014)<br>Bylaw update pending (Action 7.1)   | <b>COQUITLAM</b><br>Bylaw 4091 (2010) — unamended<br>No reform proposed in UFMS   |
|---|---|---|--|---|---|
| <b>Replacement tree ratio</b>                             | 2:1 mandatory (2 replacement trees per protected tree removed). Exception: 1:1 for red alder/black cottonwood outside riparian areas.   | 1:1 mandatory (one replacement per protected tree removed). Climate-adapted species list (Schedule B). Small-maturity species count as 0.5 toward target.   | Tiered 1:1 to 4:1 by tree size. Trees ≥50 cm DBH: 2 medium/large or 4 small replacements. Protected trees on development lots: 2 medium/large or 4 small.                                      | Tiered by size of tree removed: 20–30 cm = 1 replacement; 30–61 cm = 2 replacements; 61+ cm = 3 replacements. Mandatory on all development permits. Exception: non-development single/two-family lots where replacement 'may be required' at City's discretion.       | Discretionary. s.9(a): 'The General Manager may require a tree replacement plan.' No mandatory ratio in the bylaw. Amount determined by City Standards. No replacement triggered by s.12 exemptions.  |
| <b>Cash-in-lieu / dedicated reserve fund</b>              | \$550/tree cash-in-lieu when site cannot accommodate replacements. Cap of \$41,250/acre. Funds to general City use — not a dedicated urban forestry reserve.                  | \$1,000/tree cash-in-lieu into dedicated Environmental Reserve Fund. ERF also receives forfeited tree securities, forfeited development permit securities from multiple permit types, and habitat compensation.                             | Cash-in-lieu to dedicated Urban Forestry Reserve when site cannot accommodate replacements. Securities forfeited to Reserve if planting not completed within two years.                        | Yes — cash-in-lieu to dedicated Civic Tree Reserve Fund when site cannot accommodate replacements. Forfeited bonds (unreleased securities) also flow to the Civic Tree Reserve Fund.  | None. No cash-in-lieu mechanism. No dedicated urban forestry reserve fund. s.11 security deposit exists but is only triggered when the General Manager chooses to require replacement — which is discretionary under s.9(a).  |
| <b>Tree density targets on development lots</b>           | No explicit per-hectare density targets. 2:1 mandatory replacement provides an implicit minimum.  | Yes — Zoning Bylaw amended: minimum trees per lot by lot size (~62 trees/ha for new single-family residential). 30% minimum permeable vegetated area. Certificate of occupancy withheld until Landscape Architect confirms trees in ground. | Explicit density by zone: single-family 55 trees/ha (→35% canopy); multi-residential 40/ha (→25%); mixed-use 30/ha (→20%); industrial 15/ha (→11%).  | No explicit per-hectare density targets in current bylaw. Tiered replacement ratio provides an implicit minimum. Councillor Gu's November 2025 motion calls for Zoning Bylaw amendments to provide incentives aligned with a nature-based approach — not yet adopted. | None. No per-hectare tree density requirement. No minimum permeable surface requirement tied to tree retention. No occupancy permit condition linked to tree planting.  |
| <b>Heritage / significant / landmark tree designation</b> | Schedule B: hundreds of Significant Trees listed by name and location. Council bylaw amendment required to remove any listed tree. Marker/plaque program.                     | Heritage Tree designation in bylaw; protected as a category of Retained Tree.   | Landmark/Legacy Tree registry backed by bylaw. GIS-based and publicly accessible. Council bylaw amendment required for removal. Penalty: minimum \$10,000–\$50,000.                            | Covenanted Trees (trees required to be retained or planted by s.219 Land Title Act covenant) are protected in the bylaw. No formal significant/heritage tree registry with reduced-size thresholds in current bylaw. Action 7.1 expected to address this.             | None. No heritage or significant tree registry. No mechanism to designate individual trees for elevated protection. No requirement for Council involvement in the removal of any individual tree.   |
| <b>Construction-phase tree protection</b>                 | Mandatory tree protection barriers (2025: when work may directly impact protected tree). Detailed distance table by trunk diameter. No permit issued until barrier installed. | Mandatory barriers. Construction within any tree protection barrier must be supervised by arborist in real time. Post-activity report with photos required from arborist after completion.  | Mandatory Tree Protection Barriers; City inspection; arborist letter of assurance; 50% of replacement tree security released at planting approval, balance after 2-year survival confirmation. | Tree plan required to identify retained trees on development site plans. City arborist reviews and inspects. Specific mandatory barrier specifications and monitoring requirements not detailed in publicly available summary documents; governed by City Standards.  | s.5 requires a permit for cutting in steep slopes and SPEA; General Manager may suspend work under a permit if conditions not met (s.17). No mandatory tree protection barriers specified in bylaw text. No arborist supervision or monitoring requirement. No post-construction reporting. |

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|--|--|--|--|---|--|
| <b>Financial securities — replacement &amp; retained trees</b> | Replacement tree security: \$550–\$1,100/tree. Retained tree security: \$10,000/significant tree; \$5,000/specimen; \$3,000/other. Max \$15,000 (single family) or \$150,000 (subdivision/DP). | Cash security or irrevocable letter of credit for replacement trees. Retained trees protected through covenant, development permit, or building permit condition.                                      | Retained tree securities: \$5,000/tree (Landmark/Legacy or ≥50 cm DBH); \$1,000/all other. Replacement tree securities: \$370–\$740/tree. Maximum \$150,000/application. | Security required before permit issued; amount = greater of cost per replacement tree (per Consolidated Fees Bylaw) or estimated restoration cost. 90% released after post-planting inspection; 10% after one-year inspection. Forfeited bonds flow to Civic Tree Reserve Fund. | s.11 provides for a 100% replacement-value security deposit — but only where the General Manager has required replacement, which is discretionary under s.9(a). No security mechanism for retained trees during construction. Security mechanism rarely triggered as a result.   |
| <b>Penalties for unauthorized removal</b>                      | Min \$50, max \$20,000 per offence. Each tree, each day = separate offence. Double permit fees for pre-permit removal.   | Director may order removal of hazardously-cut illegal trees at owner's expense; cost recovery enforceable as a debt. (Specific penalty amounts in the underlying bylaw, not amended in 2025 document.) | Min \$500, max \$50,000 per offence. Tiered by tree size. Each tree and each day = separate offence.   | Enhanced enforcement provisions added 2014. Each tree = separate offence. Specific fine amounts set in Consolidated Fees Bylaw (not reproduced in publicly available FAQ); enforcement provisions strengthened relative to pre-2014 bylaw.                                      | s.18: Penalties under the provincial Offence Act only — no specific dollar amounts set in the bylaw itself. Each tree = separate offence. No graduated penalty schedule by tree size. In practice, the s.12 exemptions mean most removal occurs outside the permit requirement and therefore cannot constitute an offence. |
| <b>Tracking, reporting &amp; public accountability</b>         | Permit data tracked. Significant Tree registry in Schedule B is public. ~9,000 replacement trees planted per year under the framework.   | ERF balance publicly accounted. Certificate of occupancy linkage creates audit trail for every lot. Climate-adapted species list maintained and updated.   | Permit data tracked. Urban Forestry Reserve fund publicly accounted. Landmark/Legacy Tree registry GIS-based and publicly accessible.                                    | Permit data tracked. Civic Tree Reserve Fund balance maintained. City arborist team conducts inspections and post-planting reviews. Canopy target (40%) set in 2025 UFMS provides a public benchmark for the first time.  | No annual reporting on tree removal volumes. No public permit registry. No tracking of cumulative canopy loss from s.12 exemptions. No mechanism to quantify the volume of trees removed outside the permit system in any given year. No publicly stated canopy target.  |
| <b>UFMS → bylaw reform sequence</b>                            | Bylaw adopted 2006 — predates any strategy. UFMS process ongoing; bylaw is the foundation, not the output.   | Urban Forest Management Plan adopted March 2024 → four coordinated bylaw amendments November 2025 (19-month lag).  | Strategy and bylaw development integrated concurrently → Bylaw 3531 adopted February 2026.   | Urban Forest Strategy (first-ever) adopted May 2025. Action 7.1 commits to bylaw update. Council motion by Councillor Gu filed November 2025 to expedite — six months after adoption, still no bylaw reform initiated.  | UFMS launched 2023. Early Findings 2025 retreats from initial goals. Draft UFMS expected spring 2026. No bylaw reform proposed or planned as part of the UFMS process. No equivalent of Action 7.1 in published Early Findings.  |

Table 1: 14-element bylaw comparison across six municipalities. Orange cells = Burnaby (existing bylaw; update pending). Red = absent Coquitlam protections. Amber = partial protections with significant gaps. All Surrey, West Van, and Port Moody provisions are active as of March 2026.

## Table 2 — UFMS to Bylaw Reform: How Every Other City Made the Connection

The most common objection in Coquitlam is that bylaw reform can happen 'later' — after the strategy is finalized. The regional evidence does not support this sequencing. In every municipality reviewed, bylaw reform was either concurrent with or immediately followed the strategy process. Burnaby made the commitment in writing and still required a councillor motion to force action six months later. Coquitlam has not yet made the written commitment.

| MUNICIPALITY          | URBAN FOREST STRATEGY   | TREE BYLAW REFORM   | SEQUENCE / LAG  | KEY LESSON FOR COQUITLAM   |
|-----------------------|---|---|---|--|
| <b>Surrey</b>         | Urban Forest Strategy ongoing; bylaw predates and is independent of strategy (adopted 2006).  | Bylaw 16100 — adopted 2006; 17+ amendments through 2025. June 2025: process improvements only, all substantive protections maintained.  | N/A — bylaw is the foundation of the strategy, not its output.                                | A functioning bylaw is the starting point. Surrey has had what Coquitlam is debating for 19 years, at four times the scale and development pressure.   |
| <b>West Vancouver</b> | Urban Forest Management Plan adopted March 2024.  | Four coordinated bylaw amendments (Tree + Boulevard + Zoning + Environmental Reserve Fund) adopted November 2025.   | ~19 months from UFMS adoption to bylaw package.   | UFMS and bylaw treated as one integrated project. Embedding density in the Zoning Bylaw created a more durable mechanism than a standalone tree bylaw.   |
| <b>Port Moody</b>     | Urban forest strategy and Diamond Head consultation informed bylaw redesign from the ground up.   | Bylaw 3531 replaces 2015 Bylaw 2961. Adopted February 2026. Bylaw reform was the delivery mechanism for the strategy.   | Strategy and bylaw developed concurrently as one process.                                     | Bylaw reform is not a downstream step — it is simultaneous with strategic planning. The strategy without the bylaw would have changed nothing on the ground.   |
| <b>Vancouver</b>      | Updated Urban Forest Strategy adopted May 2025 (Park Board and Council, unanimous).   | Protection of Trees Bylaw (existing). Active bylaw review underway in direct response to updated strategy.  | Strategy adopted May 2025; bylaw review in progress.  | Even Vancouver — with an established bylaw — launched a new review immediately after adopting its updated strategy. The cycle of strategy → bylaw reform is continuous, not one-time.  |
| <b>Burnaby</b>        | Urban Forest Strategy (first-ever) adopted May 13, 2025. Sets 40% city-wide canopy target (currently ~32%). Action 7.1 explicitly directs staff to update the Tree Bylaw. | Existing bylaw (adopted 1996) includes 20 cm DBH threshold on development sites; 30 cm (conifer) / 45 cm (deciduous) off-site. Action 7.1 commits to update but six months after UFMS adoption, no action had occurred — Councillor Gu was required to file a public motion to expedite it. | Six months after strategy adoption: no bylaw reform initiated without political intervention. | <b>CAUTIONARY PARALLEL:</b> Burnaby committed to bylaw reform in writing (Action 7.1) and still required a councillor motion to force movement six months later. Coquitlam's Early Findings make no such commitment. The gap between written intent and actual action is where urban forests are lost. |

| MUNICIPALITY     | URBAN FOREST STRATEGY   | TREE BYLAW REFORM   | SEQUENCE / LAG   | KEY LESSON FOR COQUITLAM   |
|------------------|---|---|--|--|
| <b>COQUITLAM</b> | UFMS launched 2023. Early Findings 2025 retreats from initial goals on canopy targets, development protections, and regulatory approach. Draft UFMS expected spring 2026. | Bylaw 4091, 2010 — 15 years unamended. 20 cm DBH threshold systematically hollowed out by s.12 exemptions covering development sites. No bylaw reform proposed in Early Findings. | <b>UFMS process completing with no concurrent or planned bylaw reform — the only municipality reviewed in this position.</b> | Coquitlam is the only city in this review completing an UFMS with no bylaw reform planned. A strategy document without a delivery mechanism is a declaration of intent that changes nothing. Burnaby at least made the commitment in writing. Coquitlam has not yet done that. |

Table 2: UFMS and bylaw reform sequencing across six Metro Vancouver municipalities. Note the Burnaby row (amber): even a written commitment in an adopted strategy did not produce bylaw reform without further political intervention.

### Table 3 — West Vancouver's Four-Bylaw Integrated Package (November 2025)

West Vancouver is the most instructive recent model because it shows what a comprehensive response looks like: not a single bylaw amendment but four coordinated bylaws adopted simultaneously, creating an interlocking system. The Urban Forest Management Plan was adopted March 2024; the bylaw package followed 19 months later.

| BYLAW  | WHAT IT DOES   | WHY IT MATTERS   |
|--|--|--|
| <b>Tree Bylaw No. 4892</b><br>Amendment 5373                       | Protection thresholds: 75 cm DBH general; 20 cm DBH on development sites; named native species at 20 cm DBH. 1:1 mandatory replacement with climate-adapted species list. \$1,000/tree cash-in-lieu to ERF. Arborist must supervise construction within tree protection barrier; post-activity photo report required. Applicants must now explain why pruning cannot solve the problem before removal is approved. | Core protection layer. Development-triggered threshold is activated automatically — trees cannot be removed just before a permit is filed to avoid protection. The burden-of-proof shift makes removal the last resort, not the default.                                   |
| <b>Boulevard Bylaw No. 4886</b><br>Amendment 5374                  | No person may cut any tree on a highway or boulevard without a permit or written Director permission. Director may refuse if cutting conflicts with boulevard character. Removal may require replacement trees specified by the District Arborist.   | Extends protection beyond private parcels to the full public right-of-way. Boulevard trees are often the most visible and highest-canopy urban forest assets — this closes a significant gap left open in many municipal bylaws.   |
| <b>Environmental Reserve Fund</b><br>Bylaw 5188,<br>Amendment 5388 | ERF now explicitly receives: (1) all cash-in-lieu payments for replacement trees; (2) forfeited/unclaimed tree securities; (3) forfeited development permit securities for wildfire hazard, foreshore, and watercourse protection areas; (4) habitat compensation from development permits.  | Creates a self-sustaining, multi-source fund. The more development pressure the municipality faces, the more revenue flows into urban forest restoration. This is the fiscal architecture that makes the strategy permanent rather than aspirational.                      |
| <b>Zoning Bylaw No. 4662</b><br>Amendment 5387                     | Minimum trees per lot by lot size (formula: ~62 trees/ha for new single-family residential). One retained tree >20 cm counts as one unit; one planted medium/large-maturity tree (5 cm caliper) counts as one; two small-maturity trees count as one. 30% minimum permeable vegetated area. Landscaping plan by Landscape Architect required. Certificate of occupancy withheld until trees confirmed in ground.   | Embedding tree density in the Zoning Bylaw — not just the Tree Bylaw — is the durability mechanism. Zoning changes require full public process and political will to reverse. The occupancy permit condition makes the requirement self-enforcing: no trees, no occupancy. |

Table 3: West Vancouver's November 2025 package — Tree Bylaw Amendment 5373, Boulevard Bylaw Amendment 5374, Environmental Reserve Fund Bylaw Amendment 5388, and Zoning Bylaw Amendment 5387 — all adopted November 17, 2025.

# Key Findings from Multi-City Tree Bylaw Comparison

## 1. Coquitlam has a threshold on paper — but exemptions swallow the rule

When staff or Council members point to Coquitlam's existing 20 cm DBH threshold as evidence that the bylaw is adequate, the correct response is to go directly to Section 12. Section 12(d) exempts all protected trees on properties under a development application within an approved neighbourhood plan area — no permit required, no assessment, no replacement. Section 12(e) exempts all trees within a building envelope once a development application is filed. Section 12(b) exempts two protected trees per year per lot from the permit requirement regardless of context. Since the permit is what triggers the professional assessment obligation (s.7) and the replacement obligation (s.9), these exemptions mean that most tree removal in Coquitlam — particularly the highest-volume removal from development — operates entirely outside the protective framework the bylaw appears to provide. A threshold that does not apply to development sites is not a development-site protection.

## 2. Surrey has had a functioning bylaw for 19 years — at four times Coquitlam's development pressure

Surrey adopted its Tree Protection Bylaw in 2006. It has been amended 17 times since — each time strengthening or clarifying provisions, never weakening them. Surrey plants approximately 9,000 replacement trees per year under this framework. The June 2025 amendment made the bylaw work more smoothly for developers — faster permits, more flexible barrier materials — without touching a single substantive protection. That is the model for resolving the false choice between developer-friendly administration and meaningful tree protection. The question is not whether a functioning bylaw is achievable alongside development. Surrey has answered that question.

## 3. Burnaby is the cautionary parallel — not the model

Burnaby adopted its first Urban Forest Strategy in May 2025 — a more ambitious document than Coquitlam's Early Findings — with Action 7.1 explicitly committing staff to update the Tree Bylaw. Six months later, Councillor Gu had to file a public motion to Council to expedite that action because nothing had happened. Burnaby's existing bylaw already has a 20 cm DBH development-site threshold and 30/45 cm off-site thresholds — meaningfully stronger than Coquitlam's current approach — and Burnaby residents and elected officials still consider it inadequate. Coquitlam's Early Findings do not contain an equivalent of Action 7.1. Burnaby at least made the written commitment.

## 4. West Vancouver embedded tree protection in the Zoning Bylaw — the durability argument

West Vancouver's most strategically important move was amending the Zoning Bylaw to require a minimum number of trees per lot as a condition of all new single-family development — approximately 62 trees per hectare. This is more durable than a tree bylaw provision alone because zoning changes require a full public process and substantial political will to reverse. The mechanism is self-enforcing: the certificate of occupancy is withheld until a Landscape Architect confirms the trees are in the ground. There is no equivalent of this in Coquitlam's current bylaw or in the Early Findings.

## 5. The UDI flagged Port Moody's bylaw — and Port Moody adopted it anyway

The Urban Development Institute monitored Port Moody's new bylaw closely. Their February 2026 update described it as significantly broadening scope, requiring additional staff resources, and introducing new securities and fines. Port Moody adopted it with strong Council support. The UDI's commentary did not cause retreat. Separately, the UDI's update on Surrey's 2025 amendment was entirely positive — Surrey accommodated developer process concerns while leaving every substantive protection intact. The experience of both cities shows that developer concerns about process are addressable; the political will to hold the protective substance is a question of Council resolve.

## 6. Diamond Head has already built the template

Amelia Needoba and Diamond Head Consulting — Coquitlam's own UFMS consultant — prepared the Phase 2 Survey Summary for Port Moody's Tree Protection Bylaw Review. The same firm. The expertise, methodology, and template are already in the hands of Coquitlam's consultant team. The question is not whether the knowledge is available to produce a strong bylaw. It is whether Coquitlam's staff are directing the consultants to use it.

## 7. A strategy without a bylaw is a declaration of intent with no delivery mechanism

Every reviewed municipality treats the tree bylaw as the instrument through which the UFMS goals are actually achieved on the ground. West Vancouver: UFMS adopted March 2024, bylaw package November 2025. Port Moody: strategy and bylaw developed concurrently, adopted February 2026. Vancouver: updated strategy May 2025, bylaw review immediately launched. Burnaby: strategy adopted May 2025, bylaw reform committed in Action 7.1. A Coquitlam UFMS that sets canopy goals — even the weakened ones in the Early Findings — while leaving Section 12 exemptions intact is not a functioning strategy. It is a document that will produce no measurable change in the rate of tree removal from development sites.

## 8. The election-year political calculus

Residents experiencing development fatigue, visible tree loss, and summer heat are a growing and organized constituency. The political risk of being seen as the regional laggard on urban trees — in a year when Port Moody, West Vancouver, Vancouver, and Burnaby are all moving forward — is real and growing. The risk of adopting Port Moody's approach is comparatively manageable.

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Sources: City of Coquitlam Tree Management Bylaw No. 4091 (2010); Surrey Tree Protection Bylaw No. 16100 (consolidated to April 2025); City of Surrey Corporate Report R119, June 4, 2025; West Vancouver Tree Bylaw No. 4892 Amendment Bylaw No. 5373 (2025); West Vancouver Boulevard Bylaw Amendment 5374 (2025); West Vancouver Environmental Reserve Fund Bylaw Amendment 5388 (2025); West Vancouver Zoning Bylaw Amendment 5387 (2025); Port Moody Tree Protection Bylaw No. 3531 (February 2026); Burnaby Urban Forest Strategy (adopted May 13, 2025); Burnaby Council Motion re Bylaw Amendments and Urban Forestry Action 7.1, November 25, 2025 (Councillor Gu); UDI Advocacy Updates — City of Port Moody (February 2026) and City of Surrey (July 2025); Diamond Head Consulting, Port Moody Tree Bylaw Review Phase 2 Survey Summary. TCUF comparative analysis, March 2026.