

A scenic photograph of a body of water, likely a bay or fjord, with several kayakers in the foreground. The kayakers are on a yellow and blue kayak, and another person is visible on a red kayak further back. The water is calm with small ripples. In the background, there are several small, forested islands or headlands. The sky is filled with large, white, fluffy clouds, and the overall lighting is soft, suggesting an overcast day.

**City Of Victoria**  
**November 24, 2022**

**Howard Goshulak**

God's Pocket Marine Provincial Park

# Proposal

The City of Victoria revise No. 14-100 Fire Prevention and Regulation Bylaw:  
“32 Storage

Vehicle parking garages may only be used to store vehicles, bicycles, scooters, motorcycles, or water vehicles (canoes, kayaks and SUPs).”



# Victoria - Background

Victoria is a maritime city, surrounded by water.

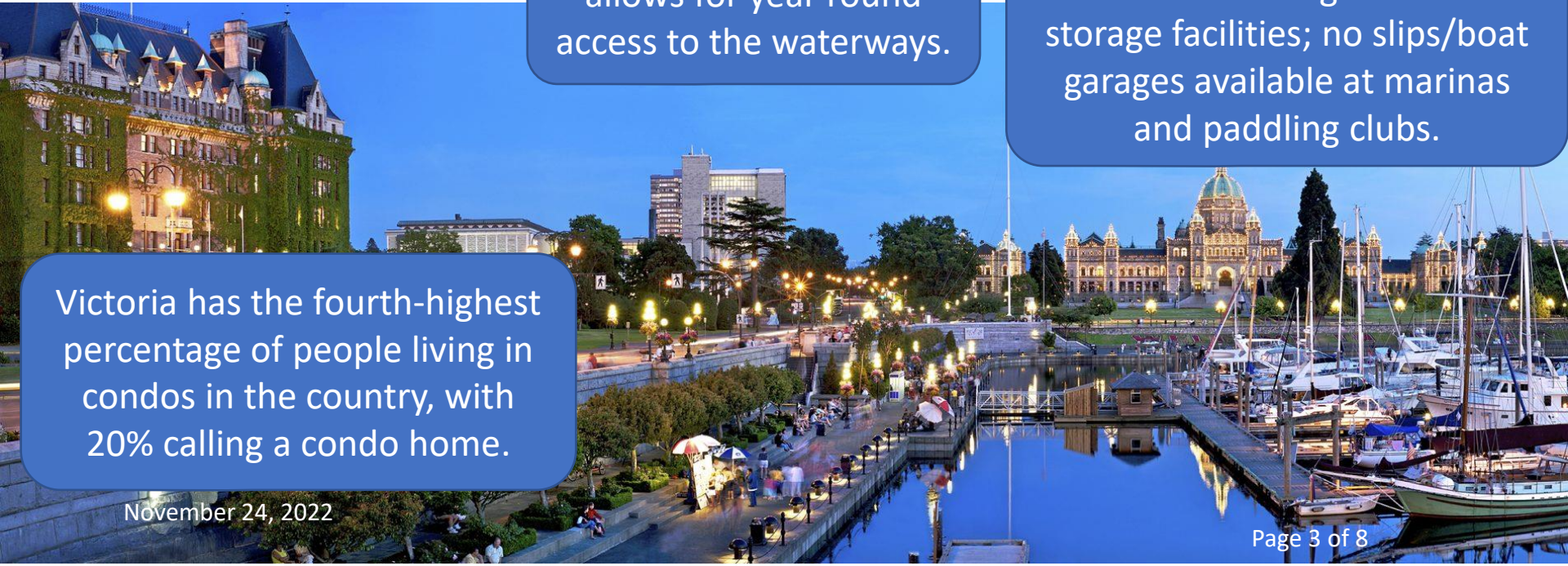
Victoria is a major center for competitive rowing in Canada

Victoria is water sport paradise; fishing, diving, kayaking, canoeing, SUP, sailing, boating, swimming, surfing, windsurfing, and kite boarding.

Victoria's mild climate allows for year round access to the waterways.

Victoria is lacking watercraft storage facilities; no slips/boat garages available at marinas and paddling clubs.

Victoria has the fourth-highest percentage of people living in condos in the country, with 20% calling a condo home.



# My Situation

- I moved to Victoria and purchased a new condominium at Bellwood Park (1201 Fort Street) in the spring, 2022.
- My condo builder, Abstract Developments, installed storage racks for my kayak and SUP in my parking stalls in the facilities' underground garage.
- In August, the Victoria Fire Department's inspection cited the Fire Code for miscellaneous items stored in parking areas as a fire risk.
- Based on this, my Strata Council adopted a new rule: "An owner, tenant or occupant of a strata lot must use parking stalls only for the parking of licensed and insured motor vehicles or motorcycles, and not for the parking of any other type of vehicle OR the storage of any other item".



# BC Fire Code

- The building and fire codes in Canada classify parking garages as “Low Hazard Industrial Occupancies”, and if sprinklered, the sprinklers must be designed in accordance with the NFPA 13 standard. Under NFPA 13 the fire protection sprinklers for garages are typically designed to “Ordinary Hazard Group 1”
- My developer and I contend that my watercraft and storage solution complies with the BC Fire Code, as they:
  - do not exceed the conditions of Ordinary Hazard Group 1,
  - do not obstruct the sprinklers,
  - are not stacked,
  - are secured in place and can remain in place during a fire without affecting aisles and means of egress.

# Consultation

- Kathy Ferguson, Fire Service Adviser of the BC Fire Commissioner indicated that while the BC Fire Code addresses storage of items like tires, aerosol products, combustible fibres and dangerous goods, it does not specifically address acceptable types of vehicles to be stored in an enclosed parking garage.
- Assistant Fire Chief Megan Sabell (Fire Prevention) of the Victoria Fire Department, acknowledged that the City's Fire Bylaw, does not specifically prohibit watercraft storage. The Department, however, has always interpreted the Bylaw that way, concerned that allowing a broader definition might trigger requests for storage of other items.





# Other BC Municipalities

1. City of Vancouver's Bulletin 2019-001-FI, "Canoes or kayaks ... would generally be acceptable inside a vehicle storage garage."
2. The City of North Vancouver Bylaw No. 8852: "6.58 Enclosed Storage Garages ... must be used for the parking of vehicles only (including ... watercraft)."
3. North Vancouver District, BC - Enclosed Parking Garage Guideline: "vehicle parking garages may only be used to store ... water vehicles (boats, kayaks)."
4. West Vancouver District, BC - Storage Garage Fire Inspection Guidelines: "garages may also contain space for parking or storing other vehicles (bicycles, boats, etc.)."

# Proposal

Based on the BC Fire Code and other municipalities interpretation and experience, the City of Victoria revise No. 14-100 Fire Prevention and Regulation Bylaw:

“32 Storage

Vehicle parking garages may only be used to store vehicles, bicycles, scooters, motorcycles, or water vehicles (canoes, kayaks and SUPs).”

