



**105 Lower Ganges Rd
Salt Spring Island, BC
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16 August 2017

Islands Trust
Salt Spring Island Local Trust Committee
#1 – 500 Lower Ganges Road
Salt Spring Island
BC V8K 2N8

Dear Sirs,

Regarding: File No: 6500-20 Ganges Village Area Planning- Harbourwalk; and Proposed Bylaw no. 491, cited as "Salt Spring Island Land Use Bylaw, 1999, Amendment No. 3, 2016"

The Islands Trust Staff report of June 1, 2017 and proposed Bylaw No 491 has been reviewed by Salt Spring Island Fire Protection District staff and the proposal to allow for additional three storey buildings in the Ganges core raises serious concerns. Salt Spring Island Fire Rescue's capacity to respond to emergencies in our community impacts our Fire Underwriters Survey (FUS) grading which is used by the insurance industry to set fire insurance premiums paid by home owners and businesses. Salt Spring Island Fire Rescue does not have the apparatus (an aerial ladder truck) necessary to effectively deal with a fire emergency in three storey structures.

The most recent fire insurance grade report (March 2015) was prepared by Opta Information Intelligence. Section 7 "Fire Underwriters Survey- Fire Department Assessment" grades the District on several criteria including 7.4 Ladder Service. The District has no ladder apparatus and received only a 30.6% credit for this grading item.

"Appendix D Requirements for Aerial Apparatus" of the report discusses the standards used to determine the need for aerial apparatus and ladder equipment within communities. (Copy attached.) This type of apparatus is typically needed to provide a reasonable level of response when buildings of an increased risk profile (fire) are permitted to be constructed. Areas with five or more buildings that are three stories or higher should have a ladder company. At the time of the report, there were seven buildings in the Ganges core of three or more stories. National Fire Protection Association (NFPA)

standards for high-hazard occupancies (including schools, hospitals, and nursing homes) also require ladder trucks.

Aerial ladder trucks can cost upwards of \$1,000,000 and require specialized training by personnel. The cost of such an apparatus would have to be carried by rate payers through increased taxes. Additionally, because of its height, a ladder truck could not be housed in any of the existing fire halls.

With an increasing number of three storey building in the Ganges core the District's Board of Trustees will have to balance the desire to provide a reasonable response level against property owners' capacity to pay. A lower response capacity could result in a reduced FUS grading and increase fire insurance premiums for businesses and home owners.

The District would ask that the Islands Trust desire to seek completion of the Ganges Harbourwalk through rezoning of adjacent properties be balanced by consideration of the potential impact and costs to other public agencies and the broader community. The District would appreciate the opportunity to be a part of the planning process before the proposed bylaw is passed to ensure fire and life safety concerns are heard.

Yours truly,



Per Svendsen
Chair, Board of Trustees
Salt Spring Island Fire Protection District



Arjuana George
Fire Chief
Salt Spring Island Fire Rescue



APPENDIX D Requirements for Aerial Apparatus

TECHNICAL BULLETIN

FIRE UNDERWRITERS SURVEY™
A Service to Insurers and Municipalities

LADDERS AND AERIALS: WHEN ARE THEY REQUIRED OR NEEDED?

Numerous standards are used to determine the need for aerial apparatus and ladder equipment within communities. This type of apparatus is typically needed to provide a reasonable level of response within a community when buildings of an increased risk profile (fire) are permitted to be constructed within the community.

Please find the following information regarding the requirements for aerial apparatus/ladder companies from the Fire Underwriters Survey Classification Standard for Public Fire Protection.

Fire Underwriters Survey

Ladder/Service company operations are normally intended to provide primary property protection operations of

- 1.) Forcible entry;
- 2.) Utility shut-off;
- 3.) Ladder placement;
- 4.) Ventilation;
- 5.) Salvage and Overhaul;
- 6.) Lighting.

Response areas with 5 buildings that are 3 stories or 10.7 metres (35 feet) or more in height, or districts that have a Basic Fire Flow greater than 15,000 LPM (3,300 IGPM), or any combination of these criteria, should have a ladder company. The height of all buildings in the community, including those protected by automatic sprinklers, is considered when determining the number of needed ladder companies.

When no individual response area/district alone needs a ladder company, at least one ladder company is needed if the sum of buildings in the fire protection area meets the above criteria."

The needed length of an aerial ladder, an elevating platform and an elevating stream device shall be determined by the height of the tallest building in the ladder/service district (fire protection area) used to determine the need for a ladder company. One storey normally equals at least 3 metres (10 feet). Building setback is not to be considered in the height determination. An allowance is built into the ladder design for normal access. The maximum height needed for grading purposes shall be 30.5 metres (100 feet).



Exception: When the height of the tallest building is 15.2 metres (50 feet) or less no credit shall be given for an aerial ladder, elevating platform or elevating stream device that has a length less than 15.2 metres (50 feet). This provision is necessary to ensure that the water stream from an elevating stream device has additional "reach" for large area, low height buildings, and the aerial ladder or elevating platform may be extended to compensate for possible topographical conditions that may exist. See Fire Underwriters Survey - Table of Effective Response (attached).

Furthermore, please find the following information regarding communities' need for aerial apparatus/ladder companies within the National Fire Protection Association.

NFPA

Response Capabilities: The fire department should be prepared to provide the necessary response of apparatus, equipment and staffing to control the anticipated routine fire load for its community.

NFPA Fire Protection Handbook, 20th Edition cites the following apparatus response for each designated condition:

HIGH-HAZARD OCCUPANCIES (schools, hospitals, nursing homes, explosive plants, refineries, high-rise buildings, and other high-risk or large fire potential occupancies):

At least four pumpers, two ladder trucks (or combination apparatus with equivalent capabilities), two chief officers, and other specialized apparatus as may be needed to cope with the combustible involved; not fewer than 24 firefighters and two chief officers.

MEDIUM-HAZARD OCCUPANCIES (apartments, offices, mercantile and industrial occupancies not normally requiring extensive rescue or firefighting forces):

At least three pumpers, one ladder truck (or combination apparatus with equivalent capabilities), one chief officer, and other specialized apparatus as may be needed or available; not fewer than 16 firefighters and one chief officer.

LOW-HAZARD OCCUPANCIES (one-, two-, or three-family dwellings and scattered small businesses and industrial occupancies):

At least two pumpers, one ladder truck (or combination apparatus with equivalent capabilities), one chief officer, and other specialized apparatus as may be needed or available; not fewer than 12 firefighters and one chief officer.



Fire Underwriters Survey
A SERVICE TO INSURERS AND MUNICIPALITIES

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In addition to the previous references, the following excerpt from the 2006 BC Building Code is also important to consider when selecting the appropriate level of fire department response capacity and building design requirements with regard to built-in protection levels (passive and active fire protection systems).

Excerpt: National Building Code 2006

A-3 Application of Part 3.

In applying the requirements of this Part, it is intended that they be applied with discretion to buildings of unusual configuration that do not clearly conform to the specific requirements, or to buildings in which processes are carried out which make compliance with particular requirements in this Part impracticable. The definition of "building" as it applies to this Code is general and encompasses most structures, including those which would not normally be considered as buildings in the layman's sense. This occurs more often in industrial uses, particularly those involving manufacturing facilities and equipment that require specialized design that may make it impracticable to follow the specific requirements of this Part. Steel mills, aluminum plants, refining, power generation and liquid storage facilities are examples. A water tank or an oil refinery, for example, has no floor area, so it is obvious that requirements for exits from floor areas would not apply. Requirements for structural fire protection in large steel mills and pulp and paper mills, particularly in certain portions, may not be practicable to achieve in terms of the construction normally used and the operations for which the space is to be used. In other portions of the same building, however, it may be quite reasonable to require that the provisions of this Part be applied (e.g., the office portions). Similarly, areas of industrial occupancy which may be occupied only periodically by service staff, such as equipment penthouses, normally would not need to have the same type of exit facility as floor areas occupied on a continuing basis. It is expected that judgment will be exercised in evaluating the application of a requirement in those cases when extenuating circumstances require special consideration, provided the occupants' safety is not endangered.

The provisions in this Part for fire protection features installed in buildings are intended to provide a minimum acceptable level of public safety. It is intended that all fire protection features of a building, whether required or not, will be designed in conformance with good fire protection engineering practice and will meet the appropriate installation requirements in relevant standards. Good design is necessary to ensure that the level of public safety established by the Code requirements will not be reduced by a voluntary installation.

Firefighting Assumptions

The requirements of this Part are based on the assumption that firefighting capabilities are available in the event of a fire emergency. These firefighting capabilities may take the form of a



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paid or volunteer public fire department or in some cases a private fire brigade. If these firefighting capabilities are not available, additional fire safety measures may be required.

Firefighting capability can vary from municipality to municipality. Generally, larger municipalities have greater firefighting capability than smaller ones. Similarly, older, well established municipalities may have better firefighting facilities than newly formed or rapidly growing ones. The level of municipal fire protection considered to be adequate will normally depend on both the size of the municipality (i.e., the number of buildings to be protected) and the size of buildings within that municipality. Since larger buildings tend to be located in larger municipalities, they are generally, but not always, favoured with a higher level of municipal protection.

Although it is reasonable to consider that some level of municipal firefighting capability was assumed in developing the fire safety provisions in Part 3, this was not done on a consistent or defined basis. The requirements in the Code, while developed in the light of commonly prevailing municipal fire protection levels, do not attempt to relate the size of building to the level of municipal protection. The responsibility for controlling the maximum size of building to be permitted in a municipality in relation to local firefighting capability rests with the municipality. If a proposed building is too large, either in terms of floor area or building height, to receive reasonable protection from the municipal fire department, fire protection requirements in addition to those prescribed in this Code, may be necessary to compensate for this deficiency. Automatic sprinkler protection may be one option to be considered.

Alternatively, the municipality may, in light of its firefighting capability, elect to introduce zoning restrictions to ensure that the maximum building size is related to available municipal fire protection facilities. This is, by necessity, a somewhat arbitrary decision and should be made in consultation with the local firefighting service, who should have an appreciation of their capability to fight fires.

The requirements of Subsection 3.2.3. are intended to prevent fire spread from thermal radiation assuming there is adequate firefighting available. It has been found that periods of from 10 to 30 minutes usually elapse between the outbreak of fire in a building that is not protected with an automatic sprinkler system and the attainment of high radiation levels. During this period, the specified spatial separations should prove adequate to inhibit ignition of an exposed building face or the interior of an adjacent building by radiation. Subsequently, however, reduction of the fire intensity by firefighting and the protective wetting of the exposed building face will often be necessary as supplementary measures to inhibit fire spread.

In the case of a building that is sprinklered throughout, the automatic sprinkler system should control the fire to an extent that radiation to neighbouring buildings should be minimal. Although there will be some radiation effect on a sprinklered building from a fire in a neighbouring building, the internal sprinkler system should control any fires that might be ignited in the building and thereby minimize the possibility of the fire spreading into the exposed building. NFPA 80A, "Protection of Buildings from Exterior Fire Exposures," provides additional information on the possibility of fire spread at building exteriors.



The water supply requirements for fire protection installations depend on the requirements of any automatic sprinkler installations and also on the number of fire streams that may be needed at any fire, having regard to the length of time the streams will have to be used. Both these factors are largely influenced by the conditions at the building to be equipped, and the quantity and pressure of water needed for the protection of both the interior and exterior of the building must be ascertained before the water supply is decided upon. Acceptable water supplies may be a public waterworks system that has adequate pressure and discharge capacity, automatic fire pumps, pressure tanks, manually controlled fire pumps in combination with pressure tanks, gravity tanks, and manually controlled fire pumps operated by remote control devices at each hose station.

For further information regarding the acceptability of emergency apparatus for fire insurance grading purposes, please contact:

Western Canada	Quebec	Ontario	Atlantic Canada
Fire Underwriters Survey 3999 Henning Drive Burnaby, BC V5C 6P9 1-800-665-5661	Fire Underwriters Survey 1611 Crémazie Blvd. East Montreal, Quebec H2M 2P2 1-800-263-5361	Fire Underwriters Survey 150 Commerce Valley Drive, West Markham, Ontario L3T 7Z3 1-800- 268-8080	Fire Underwriters Survey 238 Brownlow Avenue, Suite 300 Dartmouth, Nova Scotia B3B 1Y2 1-800-639-4528



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