



December 21, 2015

*(via email)*

Lori Ackerman, Chair  
Peace River Regional District  
Box 810, 1981 Alaska Ave  
Dawson Creek, BC V1G 4H8

**Re: New Approach to Fire Safety in BC**

Dear Ms. Ackerman,

Thank you for your letter of November 20, 2015 outlining your concerns related to the review of the existing Fire Services Act. Since the meeting at UBCM in September, further consultations and discussions have occurred on a variety of aspects including the proposed policy of extending the requirement for compliance monitoring to include regional districts. As a result of those discussions the current policy now proposes that compliance monitoring provisions only apply to municipalities.

This approach would mean that there would be no new requirements with respect to fire inspections outside of municipalities. As it appears the concerns that you have indicated relate to the previous policy proposal I won't detail a response to all the issues raised, however I can offer observations on two of the points.

With respect to the applicability of the BC Building Code and BC Fire Code, both codes apply throughout the province with the exception of federal lands. It is a requirement of the building owner to be compliant with these codes regardless of whether or not inspections are undertaken. Recent research has also shown that buildings that are not compliant are several times more likely to have a fire than buildings that are in compliance. As such I encourage the use of such inspections wherever possible, even if not required.

Regarding the question of building inventory, I have recently had discussions with the BC Assessment Authority and the indications are that if desired it would be possible to obtain information from their database to create such an inventory.

January 14, 2016

After consideration of the above information, if you would still like to discuss any of the other issues I would be happy to do so at a mutually convenient time.

Yours truly,

A handwritten signature in black ink, appearing to read 'G. Anderson', with a long horizontal flourish extending to the right.

Gordon Anderson  
Fire Commissioner

c.c. Al Richmond, President UBCM  
David Stuart, LGMA

January 14, 2016



PEACE RIVER REGIONAL DISTRICT

Office of: the Chair

November 20, 2015

Office of the Fire Commissioner  
Box 9201 Stn Prov Govt  
Victoria BC V8W 9J1

via email: [OFC@gov.bc.ca](mailto:OFC@gov.bc.ca)

Attention: Gordon Anderson, Fire Commissioner

**RE: New Approach to Fire Safety in BC**

Dear Mr. Anderson,

Thank you for providing our staff, Trish Morgan, General Manager of Community and Electoral Area Services, with the opportunity to meet and discuss the Office of the Fire Commissioner's (OFC) "New Approach to Fire Safety in BC" during the UBCM Convention on September 23, 2015. As a follow-up to that meeting, our Board of Directors has requested that the following concerns be forwarded to your office for consideration.

- 1) **Establishment of a Service Function:** At the meeting a number of representatives inquired as to how regional districts will create a service function. A service establishment bylaw will be required to identify how costs will be recovered, the boundaries of the service areas, etc. and in most cases will require elector approval. Clarification and guidance from the OFC and the Ministry of Community, Sport and Cultural Development on this issue is requested.
- 2) **Cost for the Service Borne by Residential Tax-Payers:** Although the service will only apply to industrial/commercial operations and public buildings and fees could be collected to offset the costs of the service, initially residential tax-payers will be impacted to establish the service. Regional districts cannot choose to tax only certain property classifications to provide a service and thus all tax-payers will pay through taxation until such time that a service is self-sustaining through fees, if at all.

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**PLEASE REPLY TO:**

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- 3) Lack of Building Inspection Services:** Currently the Peace River Regional District's building inspections services are limited with some geographic areas falling within a mandatory inspection area and the vast remainder within a voluntary inspection area. Given the close relationship between the BC Building Code and BC Fire Code, it seems unreasonable that those within a voluntary building inspection area would be required to comply with Fire Code inspections when they may not have received a building inspection that could have reduced the chances of a violation under the BC Fire Code.
- 4) Limited Staff Resources & Expansive Geographic Area:** The Peace River Regional District currently has 45 staff that provide services to approximately 62,000 residents across a geographic area of 12 million hectares. Our boundaries encompass almost 15% of the Province of BC's total land base. In order to deliver a new service such as this, it will require addition of staff resources whose costs may or may not be covered by the fees collected. Furthermore, the Northeast experiences a chronic challenge in recruiting and retaining qualified individuals in the areas of building inspection, bylaw enforcement and fire services – the three areas of expertise that the OFC has suggested would be appropriate to provide the service.

Partnerships with other local governments to deliver the service may also be challenging as they are often limited in their own staff resources and have commitments that they need to meet within their own jurisdictional boundaries.

- 5) Development of a Facility Inventory:** The Peace River Regional District is the hub of oil and gas activity within the Province of BC, in addition to having strong mining and forest sectors. Given our expansive region with thousands of industrial operations, it will be extremely challenging to develop and maintain an inventory of "public" buildings where the definition of "public buildings" seems to include industrial operations based on the information provided by the OFC.

Tools that have been identified in your document as means to develop this inventory are inadequate in the context of the Peace River Regional District as building permits are only required in certain areas of the region and the Regional District does not require business licenses. Furthermore, many of the industrial facilities are located outside of our zoning areas and do not require Regional District approval.

Given these challenges, clarification and guidance is required from the OFC and the Ministry of Community, Sport and Cultural Development on the types of “industrial” facilities (e.g., oil and gas, mills, mines, etc.) that will require inspection oversight by regional districts.

The Peace River Regional District sincerely hopes that the Office of the Fire Commissioner and the Ministry of Community, Sport and Cultural Development will reconsider this proposal given the impacts to regional districts and in particular the unique challenges that we will face in attempting to deliver this service. We look forward to hearing back from your office.

Yours truly,



Lori Ackerman  
Chair

- cc: - The Honourable Peter Fassbender, Minister of Community, Sport and Cultural Development
- The Honourable Mike Bernier, Minister of Education and MLA - Peace River South
  - Pat Pimm, MLA – Peace River North
  - Chris Cvik, CAO, Peace River Regional District

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