

Thetis Island Improvement District

AUG15 '16 REC'D EMBC HQ

PO Box 3-13
Thetis Island
BC, V0R 2Y0

259638

Emergency Management BC
Office of the Fire Commissioner
PO Box 9201 Stn Prov Govt,
Victoria BC, V8W 9J1

August 10, 2016

Subject: Playbook Interpretation

Dear Sirs,

We are the Thetis Island Improvement District (TIID), AHJ of the Thetis Island Volunteer Fire Department (TIVFD). We would like some assistance in understanding parts of the Playbook.

Before the Playbook was issued, the TIVFD training included SCBA, search and rescue, and RIT training. However, recently the emphasis has been on basic training of new recruits, so only the older members have SCBA training. All members are trained never to enter a building before the IC sized up the situation and determined whether an aggressive attack was possible, given the turnout, training and expertise of the members present, the state of the fire and the water supply. In the 34 years of the TIVFD's existence, over 90% of incidents called for defensive attack, and it has never been necessary to carry out a search and rescue operation. This training was done for what may happen, not what has happened. The nightmare scenario is showing up to a fire with somebody trapped inside.

Studying the Playbook, and looking at our training program and community expectations of an interior department, we concluded that we only really meet the exterior standard at this time, and so as the AHJ, we declared the service level as exterior. In doing so, the playbook has removed the option from the IC to mount an interior attack, which is especially troubling should we ever encounter the nightmare scenario. It is one thing to refuse to rescue a victim because the resources of trained personnel and equipment are not available; however it is unconscionable to do it because a rule says you can't, even if you have the resources. Being on an island where mutual aid is not a practical alternative, we are under some pressure to upgrade to interior level. To do this we would like to have a better understanding of the Playbook provisions before taking that step.

The Playbook states that it is permissible for exterior firefighters to enter a structure to respond to a simple incident where an IDLH atmosphere does not yet exist, or after the IDLH atmosphere no longer exists as a result of fire suppression operations or otherwise, which implies that exterior firefighters don't use SCBAs. However, the next paragraph states that where there is a potential risk of an IDLH atmosphere developing, or risk from smoke or particulate matter when conducting

external operations (including overhaul), SCBA's must be worn, so exterior designation includes SCBA training.

This raises the question of what exactly is an IDLH atmosphere. The playbook defines it as an immediate threat to a person's safety through inhalation or exposure (e.g. smoke, noxious vapour, super-heated air). Current health and safety training emphasizes that all fires create the potential hazard of toxic vapours from burning plastics which are a danger long after the fire is extinguished (as acknowledged by the reference to overhaul above), therefore any fire, including simple incidents, are potentially IDLH. Wearing an SCBA removes the danger of inhalation of toxic vapours; as such we believe that it is permissible for exterior firefighters to enter a structure wearing SCBAs so long as there is reasonable visibility through smoke and no superheated air. In fact, if dense smoke and superheated air have been removed by positive pressure ventilation (the "otherwise" in the previous paragraph?), we consider that the IDLH atmosphere no longer exists apart from possible residual toxic vapours, and subject always to an appropriate risk assessment by the Incident Commander, it may be appropriate for members of an exterior operations service level department to enter the structure, provided they wear SCBA's. Is this a reasonable interpretation? If it is, it enables our department to continue operating as before and takes the pressure off having to upgrade to interior operations service level in a hurry.

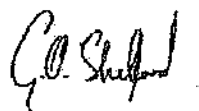
We understand that the curriculum for upgrading from exterior operations to interior is not published yet. What is the status of the interior training program?

We look forward to your response.

Yours truly,



Keith Rush
Chair, Board of Trustees
Thetis Island Improvement District
250-416-0013
keithrush17@gmail.com



Graeme Shelford
Trustee and Retired Deputy Chief, TIVFD
Thetis Island Improvement District
250-246-1509
graemeshelford@gmail.com

Email copies:

Phil Lemire, President FCABC: president@fcabc.ca
Don Jolley, 1st Vice President FCABC: djolley@pittmeadows.bc.ca

Cooper, Robert TRAN:EX

From: s.22
Sent: July-05-16 17:41
To: Cooper, Robert TRAN:EX
Subject: Re: Delivery Status Notification (Failure)

Thanks for the reply:

Further to my email. I had a more in depth look at the playbook and found on page 17 under Exterior Operations Service Level that the last paragraph mentions "except" underlined and in bold that the Exterior Operations Service Levels do not apply to support positions and it names two functions that we cover, rehab and drivers.

It very clear to me that as Auxiliaries we are not firefighters but operate in a support positions and therefore are exempt from these regulations, but still require training for our particular function.

The dismissal is causing great conflict in our community.

Could you expand and clarify this except statement and send us an official interpretation so we can clear up this mess.

On Tue, Jul 5, 2016 at 3:26 PM, Cooper, Robert TRAN:EX <Bob.Cooper@gov.bc.ca> wrote:

Hi s.22

I have been in a court case will get back this week.

BC

Bob Cooper

Office of the Fire Commissioner

Office 250-952-4307



Emergency
Management

From: s.22
Sent: July-01-16 12:14 AM
To: Cooper, Robert TRAN:EX

Subject: Fwd: Delivery Status Notification (Failure)

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Date: Thu, Jun 30, 2016 at 11:42 PM

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To: Bob.Cooper@gov.bc.ca

----- Forwarded message -----

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To: s.22

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Bob.Cooper@gov.ca.bc

Technical details of permanent failure:

DNS Error: 10201929 DNS type 'mx' lookup of gov.ca.bc responded with code NXDOMAIN

Domain name not found: gov.ca.bc

----- Original message -----

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Thu, 30 Jun 2016 23:38:48 -0700 (PDT)

MIME-Version: 1.0

Received: by 10.79.74.65 with HTTP; Thu, 30 Jun 2016 23:38:48 -0700 (PDT)

From: s.22

Date: Thu, 30 Jun 2016 23:38:48 -0700

Message-ID: <CAPZuuB2KsGvP8_N+Wk+Cba2F5WTtG=r0guhG+oOwyF9j5y9e5g@mail.gmail.com>

Subject: Playbook

To: Bob.Cooper@gov.ca.bc

Content-Type: multipart/alternative; boundary=94eb2c05f87e32d0b505368d3d4b

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playbook's firefighters requirements have resulted in 7 people being
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we consider ourselves as Auxiliary, basically we do everything but enter
the hot zone. Water supply, staging, SCBA bottle exchange and refills,
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still perform valuable service to their communities.

The category Auxiliary is not mentioned in the Playbook although drivers
are mentioned ask having additional training.

You are causing us major problems with this playbook, we need a lower level
of qualifications for smaller departments...

Cooper, Robert TRAN:EX

From: Cooper, Robert TRAN:EX
Sent: July-08-16 17:37
To: s.22
Subject: RE: Delivery Status Notification (Failure)

Hi s.22

I hope this helps:

The AHJ must immediately take steps to become compliant with the level in which has been decided and it becomes a matter of due diligence to ensure the actions taken are reasonable in the circumstances. If the chosen service level is exterior then firefighters engaged in Exterior type operations must have the training as per the Playbook (and the existing WorkSafeBC regulations – 'worker must be trained for the duties they are expected to perform' (my wording). This does not mean that nothing can be done unless everyone is fully trained, but it does mean anyone engaging in work at a scene must be trained as indicated.

Bob

Bob Cooper
Office of the Fire Commissioner
Office 250-952-4307



**Emergency
Management**

From: s.22
Sent: July-05-16 5:41 PM
To: Cooper, Robert TRAN:EX
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Cooper, Robert TRAN:EX

From: Cooper, Robert TRAN:EX
Sent: July-08-16 16:10
To: 'PEnsor@crd.bc.ca'
Cc: Cooper, Robert TRAN:EX
Subject: FW: Mayne Island lays off firefighters

Hi Peter

I have been requested to comment on this Mayne Island playbook question .

Firefighters need to be trained for the work they are to perform. If the firefighters are only used as a driver or pump operator there is nothing in the Playbook requiring them to train for work they do not perform. Same concept that firefighters training to Exterior or Interior level are not required to be trained as driver or pump operators. Now if the dept. decides to put in higher requirements for positions that is their prerogative, but it would not be the Playbook requiring the it.

Please call if you would like to discuss this further.

Best Regards
Bob

*Bob Cooper
Office of the Fire Commissioner
Office 250-952-4307*



Emergency
Management

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Sent: July-08-16 16:15
To: s.22
Subject: RE: Delivery Status Notification (Failure)

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Cooper, Robert TRAN:EX

From: Watt, Stephen TRAN:EX
Sent: September-08-16 13:33
To: s.22
Cc: Cooper, Robert TRAN:EX
Subject: RE: Mayne Island Fire Dept

Hi s.22

This is my understanding:

The Board has the autonomy to determine the services they are providing under the *Local Government Act*. http://www.bclaws.ca/civix/document/id/complete/statreg/r15001_00

194 Board as governing body

- (1) The governing body of a regional district is its board.
- (2) The powers, duties and functions of a regional district are to be exercised and performed by its board unless this or any other Act provides otherwise.
- (3) A board, in exercising or performing the powers, duties and functions conferred on it by an enactment, is acting as the governing body of the regional district.
- (4) Despite any change in its membership, the board of a regional district is a continuing body and may complete any proceedings started but not completed before the change.

Division 3 — Establishing Bylaws for Services

338 (1) Subject to this section, in order to operate a service, the board must first adopt an establishing bylaw for the service in accordance with this Division.

Sincerely,

Stephen Watt
Codes and Standards Coordinator
Scientific/Technical Officer
Office of the Fire Commissioner
Emergency Management B.C.

Phone 250.952.5025 Fax 250.952.5831
24 Hour Emergency Reporting 1 800 663.3456

Follow us on Twitter [@EmergencyInfoBC](#) and [@PreparedBC](#)

From: s.22
Sent: Thursday, September 8, 2016 12:45

To: Watt, Stephen TRAN:EX
Subject: Re: Mayne Island Fire Dept

Is there is no authority higher than the local Mayne Island Improvement District?
If the district is endangering the public thru the dismissal of its operations support personnel what recourse do we have? Is there a ministry responsible for Improvement Districts?
Thank you

Sent from my iPhone

On Sep 8, 2016, at 11:15 AM, Watt, Stephen TRAN:EX <Stephen.Watt@gov.bc.ca> wrote:

Hello s.22

I have received your emails from FSA Bob Cooper (attached and below).

The following commentary is information that I have provided to other fire department personnel and local government CAO's, to help understand the process and the responsibility that the *Fire Services Act* places on the Fire Commissioner regarding firefighter training.

Providing a fire protection service is a discretionary service that a local government chooses to provide as per the *Local Government Act/Community Charter*.

The fire service level is determined by the local government (Board /Council) depending on the resources and funding available to them.

The province has no authority over which level of service a local government decides to establish.

The *Fire Services Act* requires that the Fire Commissioner set a standard for fire fighter training only, not the volunteer fire departments' service level, which is the local governments responsibility.

The Playbook (standard) is used to determine the training that fire service personnel should have to support the level established by the local government..

Once this service level has been determined, a policy/bylaw should be documented.

The service level that is established forms the basis on which the fire fighters are required to be trained to.

The "proper authority" to consult with regarding your concerns is the Mayne Island Improvement District, Board of Trustees.

http://media.wix.com/ugd/3a8eb8_8dc6aa1e6ca04986b085a9110fc90d36.pdf

This message is intended to assist in the understanding of the interpretation and requirements of the Fire Services Act and pursuant regulations. It is not intended to provide legal advice and should not be relied upon as such. It is also not intended to replace the need to consult the legislation and regulations for their application in a particular situation. In the event of a conflict between the legislation and this message, the legislation will prevail." As part of the Code development process, this message may be sent to the Building and Safety Standards Branch.

Sincerely,

Stephen Watt
Codes and Standards Coordinator
Scientific/Technical Officer
Office of the Fire Commissioner
Emergency Management B.C.

Phone 250.952.5025 Fax 250.952.5831
24 Hour Emergency Reporting 1.800.663.3456

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From: Cooper, Robert TRAN:EX
Sent: Thursday, September 8, 2016 11:00
To: Watt, Stephen TRAN:EX
Subject: FW: Mayne Island Fire Dept

FYI

Bob Cooper
Office of the Fire Commissioner
Office 250-952-4307
<image001.png>

From: s.22
Sent: September-06-16 1:49 PM
To: Cooper, Robert TRAN:EX
Subject: Mayne Island Fire Dept

I have written to you a while ago about the problems that the Playbook has created in our community.

Part of your reply was that the Chief and Board could set higher training level requirements for everyone on the dept.

The Chief and Board rather than just saying they have set higher level are using the playbook as the excuse to dismiss all 7 of its Auxiliary. In the playbook there are exception to the training levels required for support personnel. It names these positions such as re-hab, truck drivers and medical first responders., Basically we perform all functions except those in the hot zone that require breathing apparatus. You can read the arguments being presented by the chair of the board and the reply by the auxiliary in the August and September issue of our local monthly paper the Mayneliner. page 21 August, and page 21 and page 24 in the September issue. There has been no reply to the September article put in the September Mayneliner.

Cilla has mostly invented a colorful history of the changing role of the Auxiliary to justify our dismissal. I was ^{s.22} and while I can't recall any original operating procures or guidelines I can assure you we have not seen any operating guidelines for years.

With an Improvement District such a we have on Mayne there is no appeal body or higher authority to counteract decisions. I have written to Gary Holman our MLA since Improvement districts are created by the Provincial Gov. The decision to dismiss 6-7 support personnel just before the dry season has put Mayne Island in a dangerous position. The last major residential fire was responded to by 6 regular firefighters and 5 support personnel. An analyst was done and considering the wind and moisture the fire would have been across the island in about 2 hrs if not held. The fire dept has become divided with poor practise turn out.

What can we do? Is there any way that you could provide a committee to investigate the situation. Is the fire dept meeting its obligation? Can you investigate as the Fire Commission Office or direct this message to the proper authority.

Thank you

<mime-attachment>

Cooper, Robert TRAN:EX

From: Cooper, Robert TRAN:EX
Sent: September-08-16 11:03
To: Watt, Stephen TRAN:EX
Subject: FW: Mayne Island Fire Dept

*Bob Cooper
Office of the Fire Commissioner
Office 250-952-4307*



**Emergency
Management**

From: s.22
Sent: September-07-16 12:00 PM
To: Cooper, Robert TRAN:EX
Subject: Mayne Island Fire Dept

Just to add to yesterday note.

There was a fire call yesterday and only 6 firefighters responded out of a roster of 16 firefighters and 2 rookies. I thought a Safety Officer was a requirement. We have not have a Safety Officer for years on our calls, unless our Fire Chief who is also the Deputy Chief and Training Officer is also doing this function. s.22

s.22 I understood the Safety Officer was to be independent of the Chief because he might be critical of the Chief decisions. No Safety Officer no criticism.

I'm hopping you will investigate before there is an accident.

Thank you