

November 18th, 2025

Lake Cowichan Fire Department
3 N Shore Dr
Lake Cowichan, British Columbia, V0R 2G0

Attention: Doug Knott, Fire Chief

Re: Fire Underwriters Survey – Town of Lake Cowichan

Fire Underwriters Survey is a national organization that represents more than 85 percent of the private sector and casualty insurers in Canada. Fire Underwriters Survey provides data to program subscribers regarding public fire protection for fire insurance statistical and underwriting evaluation.

The following letter provides the current applicable Fire Insurance Grades for the Town of Lake Cowichan.

The Public Fire Protection Classification (PFPC) is a numerical grading system scaled from 1 to 10 that is used by Commercial Lines¹ insurers. Class 1 represents the highest grading possible, and Class 10 indicates that little or no fire protection is in place. The PFPC grading system evaluates the ability of a community's fire protection programs to prevent and control major fires that may occur in multi-family residential, commercial, industrial, institutional buildings, and course of construction developments.

Fire Underwriters Survey also assigns a second grade for community fire protection. The second grading system, entitled Dwelling Protection Grade (DPG), assesses the protection available for small buildings such as single-family dwellings and is used by Personal Lines² insurers.

The DPG is a numerical grading system scaled from 1 to 5. One (1) is the highest grading possible and 5 indicates little or no fire protection is present. This grading reflects the ability of a community to handle fires in small buildings.

The following information in the two tables confirms the updated Fire Insurance Grades for the Town of Lake Cowichan as per the information submitted.

¹ Commercial Lines: A distinction marking property and liability coverage written for business or entrepreneurial interests (includes institutional, industrial, multi-family residential and all buildings other than detached dwellings that are designated single family residential or duplex) as opposed to Personal Lines.

² Personal Lines: Insurance covering the liability and property damage exposures of private individuals and their households as opposed to Commercial Lines. Typically includes all detached dwellings that are designated single family residential or duplex.

Table 1 - Dwelling Protection Grade Updates for Lake Cowichan

SUB DISTRICT(S) and (contract protection areas)	DPG Previous	DPG Updated	COMMENTS
Lake Cowichan Fire Hall – Lake Cowichan, Woodlands Shore, and Bald Mountain W.S. hydrant area	3A	3A	Hydrant Protected – Personal Lines insured dwellings properties within 300 m of a public hydrant, and within 8 km in road travel distance of a recognized responding fire station
Lake Cowichan Fire Hall – Non hydrant area	3B(S)	3B(S)	STSS – Personal Lines insured dwellings within 8 km in road travel distance of the Lake Cowichan fire station and within 5 in road travel distance of a recognized water supply point.
Lake Cowichan Fire Hall – Non hydrant area	3B	3B	Firehall Protected – Personal Lines insured dwellings not within 300 m of a recognized public hydrant, but within 8 km in road travel distance of a recognized responding fire station

Table 2 - Public Fire Protection Classification Updates for Lake Cowichan

SUB DISTRICT(S) and (contract protection areas)	PFPC Previous	PFPC Updated	COMMENTS
Lake Cowichan Fire Hall – Lake Cowichan W.S. hydrant area	6	6	Hydrant Protected – Commercial Lines insured properties within 150 m of a public hydrant, and within 5 km in road travel distance of a recognized responding fire station
Lake Cowichan Fire Hall – Woodlands Shore and Bald Mountain W.S. hydrant area	8	8	Hydrant Protected – Commercial Lines insured properties within 150 m of a public hydrant, and within 5 km in road travel distance of a recognized responding fire station
Lake Cowichan Fire Hall – Non hydrant area	9	9	Firehall Protected – Commercial Lines insured properties not within 150 m of a recognized public hydrant, but within 5 km in road travel distance of a recognized responding fire station

Fire Underwriters survey would like to advise that the Public Fire Protection Classification (PFPC) has been maintained at PFPC 6/8/9, and the Dwelling Protection Grade (DPG) has been maintained at DPG 3A/3B(S)/3B for Lake Cowichan Fire Hall.

As per the Technical Bulletin in Appendix A, credit for fire insurance grading purposes may be granted for a fire apparatus between 20 and 30 years in age for small and rural communities.

Fire Underwriters Survey has supplied two documents within the Appendices of this letter for the purpose of providing information to Lake Cowichan with regards to: Apparatus Life Service Recognition, and the Minimum Requirements for each Dwelling Protection Grade (DPG) – Personal Lines Classifications per fire station.

Please note that this letter is private and confidential. The underlying data of this letter has been developed for fire insurance grading and classification purposes. This letter may also be used by the stakeholders to assist in planning the future direction of public fire protection services for the Town of Lake Cowichan

Fire Underwriters Survey



Please contact our office if there are any questions or comments regarding the intent or content throughout this letter.

Jomari Gaza
Public Fire Protection Specialist, Fire Underwriters Survey

Fire Underwriters Survey



Appendix A - Insurance Grading Recognition of Used or Rebuilt Fire Apparatus



TECHNICAL BULLETIN

FIRE UNDERWRITERS SURVEY™

A Service to Insurers and Municipalities

INSURANCE GRADING RECOGNITION OF USED OR REBUILT FIRE APPARATUS

The performance ability and overall acceptability of older apparatus has been debated between municipal administrations, the public fire service and many others for years. Fire Underwriters Survey (FUS) has reviewed experiences across Canada and in other countries and has developed a standard for acceptance of apparatus as the apparatus becomes less reliable with age and use.

The public fire service is unique compared to other emergency services in that fire apparatus vehicles are not continuously in use. However, when in use, the apparatus is subject to considerable mechanical stress due to the nature of its function. This stress does not normally manifest itself on the exterior of the equipment. It is effectively masked in most departments by a higher standard of aesthetic care and maintenance. Lack of replacement parts further complicates long term use of apparatus. Truck and pump manufacturers maintain a parts inventory for each model year for a finite time. After that period, obtaining necessary parts may be difficult. This parts shortage is particularly acute with fire apparatus due to the narrow market for these devices.

Fire Underwriters Survey lengthy experience in evaluating fire apparatus indicates that apparatus should be designed to an acceptable standard. The standard that is accepted throughout Canada by Fire Underwriters Survey is the Underwriters' Laboratories of Canada (ULC) Standard S515 (most updated version) titled, "Automobile Fire Fighting Apparatus," which was adopted as a National Standard of Canada in September 2004. Alternatively, NFPA 1901, the Standard for Automotive Fire Apparatus (most updated version) is also accepted by Fire Underwriters Survey with respect to apparatus design. Fire apparatus should be built by recognized manufacturers and tested by a suitably accredited third party.

Fire apparatus should respond to first alarms for the first fifteen years of service. During this period it has reasonably been shown that apparatus effectively responds and performs as designed without failure at least 95% of the time. For the next five years, it should be held in reserve status for use at major fires or used as a temporary replacement for out-of-service first line apparatus. Apparatus should be retired from service at twenty years of age. Present practice indicates the recommended service periods and protocols are usually followed by the first purchaser. However, at the end of that period, the apparatus is either traded in on new apparatus or sold to another fire department. At this juncture, the unit may have one or more faults which preclude effective use for emergency service. These deficiencies include:

- a. Inadequate braking system
- b. Slow pick-up and acceleration
- c. Structurally weakened chassis due to constant load bearing and/or overloading
- d. Pump wear



FUS has modified its application of the age requirement for used or rebuilt apparatus. Due to municipal budget constraints within small communities we have continued to recognize apparatus over twenty years of age, provided the truck successfully meets the recommended annual tests and has been deemed to be in excellent mechanical condition. The specified service tests are outlined below under the heading “Recommended Service Tests for Used or Modified Fire Apparatus”. Testing and apparatus maintenance should only be completed by a technician who is certified to an appropriate level in accordance with NFPA 1071, *Standard for Emergency Vehicle Technician Professional Qualifications*.

Insurance grading recognition may be extended for a limited period of time if we receive documentation verifying that the apparatus has successfully passed the specified tests. If the apparatus does not pass the required tests or experiences long periods of “downtime” we may request the municipal authority to replace the equipment with new or newer apparatus. If replacement does not occur, fire insurance grading recognition may be revoked for the specific apparatus which may adversely affect the fire insurance grades of the community. This can also affect the rates of insurance for property owners throughout the community.

Table 1 Service Schedule for Fire Apparatus For Fire Insurance Grading Purposes

Apparatus Age	Major Cities ³	Medium Sized Cities ⁴	Small Communities ⁵ and Rural Centres
0 – 15 Years	First Line Duty	First Line Duty	First Line Duty
16 – 20 Years	Reserve	2 nd Line Duty	First Line Duty
20 – 25 Years ¹	No Credit in Grading	No Credit in Grading or Reserve ²	No Credit in Grading or 2 nd Line Duty ²
26 – 29 Years ¹	No Credit in Grading	No Credit in Grading or Reserve ²	No Credit in Grading or Reserve ²
30 Years +	No Credit in Grading	No Credit in Grading	No Credit in Grading

¹ All listed fire apparatus 20 years of age and older are required to be service tested by recognized testing agency on an annual basis to be eligible for grading recognition. (NFPA 1071)

² Exceptions to age status may be considered in a small to medium sized communities and rural centres conditionally, when apparatus condition is acceptable and apparatus successfully passes required testing.

³ Major Cities are defined as an incorporated or unincorporated community that has:

- a populated area (or multiple areas) with a density of at least 400 people per square kilometre; AND
- a total population of 100,000 or greater.

⁴ Medium Communities are defined as an incorporated or unincorporated community that has:

- a populated area (or multiple areas) with a density of at least 200 people per square kilometre; AND/OR
- a total population of 1,000 or greater.

⁵ Small Communities are defined as an incorporated or unincorporated community that has:

- no populated areas with densities that exceed 200 people per square kilometre; AND
- does not have a total population in excess of 1,000.



Table 2 Frequency of Listed Fire Apparatus Acceptance and Service Tests

	<i>Frequency of Test</i>					
	@ Time of Purchase New or Used	Annual Basis	@ 15 Years	@ 20 Years <i>See Note 4</i>	20 to 25 Years (annually)	After Extensive Repairs <i>See Note 5</i>
Recommended For Fire Insurance Purposes	Acceptance Test if new; Service Test if used & < 20 Years	Service Test	Acceptance Test	Acceptance Test	Acceptance Test	Acceptance or Service Test depending on extent of repair
Required For Fire Insurance Purposes	Acceptance Test if new; Service Test if used & < 20 Years	No Test Required	No Test Required	Acceptance Test	Acceptance Test	Acceptance or Service Test depending on extent of repair
Factor in FUS Grading	Yes	Yes	Yes	Yes	Yes	Yes
Required By Listing Agency	Acceptance Test	No	No	No	N/A	Acceptance Test
Required By NFPA <i>See Note 6</i>	Acceptance Test	Annual Service Test	Annual Service Test	Annual Service Test	Annual Service Test	Service Test

Note 1: See: 'Service Tests for Used or Rebuilt Fire Apparatus' for description of applicable tests

Note 2: Acceptance Tests consist of 60 minute capacity and 30 minute pressure tests

Note 3: Service Tests consist of 20 minute capacity test and 10 minute pressure test in addition to other listed tests

Note 4: Apparatus exceeding 20 years of age may not be considered to be eligible for insurance grading purposes regardless of testing. Application must be made in writing to Fire Underwriters Survey for an extension of the grade-able life of the apparatus.

Note 5: Testing after extensive repairs should occur regardless of apparatus age within reason.

Note 6: Acceptance Tests: See NFPA 1901, Standard for Automotive Fire Apparatus

Service Tests: See NFPA 1911, Standard for Service Tests of Fire Pump Systems on Fire Apparatus, Article 5.1



SERVICE TESTS FOR USED OR MODIFIED FIRE APPARATUS

The intent of this document is to ensure that all used or modified fire apparatus, equipped with a pump or used for tanker service, essentially meet the requirements of Underwriters' Laboratories of Canada (ULC) "Standard for Automobile Fire Fighting Apparatus" S515-04 or subsequent (current) editions of the Standard. Full adherence with the following specified tests is recommended when purchasing used apparatus.

Weight Tests

Load Balance Test:

When fully laden (including a 460kg (1000 lbs) personnel weight, full fuel and water tanks, specified load of hose and miscellaneous equipment), the vehicle shall have a load balance of 22% to 50% of total vehicle mass on the front axle and 50% to 78% of this mass on the rear axle.

Distribution of mass of 33% and 67% respectively on the front and rear axles is preferable for a vehicle having dual rear tires or tandem rear axles.

For a vehicle having tandem rear axles and dual tires on each axle, a loading of between 18% and 25% on the front axle with the balance of mass on the rear axles is permissible.

Road Tests

Acceleration Tests:

2.1.1) From a standing start, the apparatus shall attain a true speed of 55 km/h (35 mph) within 25 seconds for Pumpers carrying up to 3,150 litres (700 gallons) of water.

For apparatus carrying in excess of 3,150 litres (700 gallons) or apparatus equipped with aerial ladders or elevating platforms, a true speed of 55 km/h (35 mph) in 30 seconds should be attained.

2.1.2) The vehicle should attain a top speed of at least 80 km/h (50mph).

Braking Test:

The service brakes shall be capable of bringing the fully laden apparatus to a complete stop from an initial speed of 30 km/h (20 mph) in a distance not exceeding 9 metres (30 feet) by actual measurement. The test should be conducted on a dry, hard surfaced road that is free of loose material, oil and grease.



Pump Performance Tests

Hydrostatic Test

Recent evidence of hydrostatic testing of the pump for 10 minutes at a minimum pressure of 3,400 kPa (500 psi). APPLICABLE TO NEW OR REBUILT PUMPS ONLY (see 3.3).

Priming and Suction Capability Tests

Vacuum Test:

The pump priming device, with a capped suction at least 6 metres (20 feet) long, shall develop -75 kPa (22 inches of mercury) at altitudes up to 300 metres (1000 feet) and hold the vacuum with a drop of not in excess of 34 kPa (10 inches of mercury) in 10 minutes.

For every 300 metres (1000 feet) of elevation, the required vacuum shall be reduced 3.4 kPa (1 inch mercury).

The primer shall not be used after the 10-minute test period has been started. The test shall be made with discharge outlets uncapped.

Suction Capability Test:

The pump (in parallel or series) when dry, shall be capable of taking suction and discharging water with a lift of not more than 3 metres (10 feet) through 6 metres (20 feet) of suction hose of appropriate size, in not more than 30 seconds and not over 45 seconds for 6000 L/min (1320 lgpm) or larger capacity pumps. Where front or rear suction is provided on midship pumps, an additional 10 seconds priming time will be allowed. The test shall be conducted with all discharge caps removed.

Pump Performance

Capacity Test:

Consists of drafting water (preferably with a 10 feet lift) and pumping the rated capacity at 1000 kPa (150 psi) net pump pressure for a continuous period of at least 1 hour.

Pressure Test:

Under the same conditions as in 3.3.1 above pumping 50% of the rated capacity at 1700 kPa (250 psi) net pump pressure for at least ½ hour



For additional information on the above noted tests and test procedures, the following documents provide useful data:

- Underwriters Laboratories of Canada (ULC) publication titled S515 Standard for Automobile Fire Fighting Apparatus, latest edition.
- Fire Underwriters Survey (FUS) publication titled Fire Stream Tables and Testing Data latest edition.
- International Fire Service Training Association (IFSTA) publication titled Fire Department Pumping Apparatus, latest edition.
- National Fire Protection Association (NFPA) 1901 Standard for Automotive Fire Apparatus, latest edition.
- National Fire Protection Association (NFPA) 1911 Standard for the Inspection, Maintenance, Testing, and Retirement of In-Service Automotive Fire Apparatus, latest edition.
- National Fire Protection Association (NFPA) 1912 Standard for Fire Apparatus Refurbishing, latest edition.

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 255, boul. Crémazie E Montreal, Quebec H2M 1M2 1-800-263-5361	Fire Underwriters Survey 175 Commerce Valley Drive, West Markham, Ontario L3T 7P6 1-800- 268-8080	Fire Underwriters Survey 238 Brownlow Avenue, Suite 300 Dartmouth, Nova Scotia B3B 1Y2 1-877-634-8564

Fire Underwriters Survey



Appendix B - Dwelling Protection Grade Summary of Basic Requirements



Dwelling Protection Grade Summary of Basic Requirements per Fire Stationⁱ

DWELLING PROTECTION GRADE	WATER WORKS SYSTEM	FIRE DEPARTMENT		CORRELATION WITH PFPC ⁱⁱ Public Fire Protection Classification
		EQUIPMENT	FIREFIGHTERS ⁱⁱⁱ	
1	Water supply system designed in accordance with Fire Underwriters Survey standard "Water Supply for Public Fire Protection" with a relative classification of 5 or better	Response from within 8 km by road of a triple combination pumper	Minimum Response: - On-duty: 3 career fire fighters, plus - Off-duty: fire chief or other officer	Water Supply and Fire Department must grade PFPC Relative Class 5 or better
2	Water supply system designed in accordance with Fire Underwriters Survey standard "Water Supply for Public Fire Protection" with a relative classification of 6 or better	Response from within 8 km by road of a triple combination pumper	Minimum Response: - On-duty: 1 career fire fighters, plus - On-call: 15 auxiliary fire fighters	Water Supply and Fire Department must grade PFPC Relative Class 6 or better
3A	Water supply system designed in accordance with, and meeting the minimum requirements of, Fire Underwriters Survey standard "Water Supply for Public Fire Protection"	Response from within 8 km by road of a triple combination pumper	15 auxiliary fire fighters	No Public Fire Protection Classification required
3B	Not required – however fire department must have adequate equipment, training and access to approved water supplies to deliver standard shuttle service in accordance with NFPA 1142, Standard on Water Supplies for Suburban and Rural Fire Fighting	2 units required. Triple combination pumper <u>plus</u> a mobile water supply with a combined water carrying capacity of not less than 6,820 L (1,500 IG)	15 auxiliary fire fighters	No Public Fire Protection Classification required
4 ³	Not required – however fire department must have adequate equipment, training and access to approved water supplies to deliver shuttle service in accordance with NFPA 1142, Standard on Water Supplies for Suburban and Rural Fire Fighting	2 units required. Triple combination pumper <u>plus</u> a mobile water supply with a combined water carrying capacity of not less than 6,820 L (1,500 IG)	15 auxiliary fire fighters	No Public Fire Protection Classification required
5	Unprotected communities or communities not qualifying for Grades 1, 2, 3A, 3B, or 4 above	Unprotected communities or communities not qualifying for Grades 1, 2, 3A, 3B, or 4 above	Unprotected communities or communities not qualifying for Grades 1, 2, 3A, 3B, or 4 above	No Public Fire Protection Classification required



ⁱ Refer to additional notes and requirements for interpretation

ⁱⁱ The P.F.P.C. is a sophisticated municipal fire protection grading system utilized for Commercial Lines insurance. PFPC fire insurance grades are scaled from 1 to 10. One (1) represents a high level of fire protection and 10 indicates little or no recognized fire protection. This system evaluates the ability of a community's fire defences to prevent and control major fires that may occur in commercial, industrial and institutional buildings and/or districts.

ⁱⁱⁱ Requirements for Dwelling Protection Grade 4 are the same as for Dwelling Protection Grade 3B, however in some cases, an allowance may be considered for Dwelling Protection Grade 4 where all of the criteria for Dwelling Protection Grade 3B have been met with one exception. If more than one criteria has not been met (ex. less than 15 auxiliary fire fighters and a single pumper apparatus) Dwelling Protection Grade 5 is applied.

Where Dwelling Protection Grade 4 is applied, a signed letter of intent from the community is to be sent to Fire Underwriters Survey indicating that improvements will be made, within an agreed timeframe, to meet the criteria of Dwelling Protection Grade 3B.

It is important to note that the absolute minimum number of auxiliary fire fighters considered within the fire insurance grading is 10 and that maximum age of apparatus that can be considered is 30.