



"Service With Pride"

CITY OF CLOVIS

FIRE DEPARTMENT

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March 2, 2009

NIOSH Mailstop: C-34
Robert A. Taft Lab
4676 Columbia Parkway
Cincinnati, Ohio 45226

NIOSH:

RE: NIOSH-141; Preventing Deaths and Injuries of Firefighters When Fighting Fires in Unoccupied Structures

The mission of the fire service is to protect life, environment and property from the effects of fire, medical emergencies, hazardous materials and disasters. The concepts in the draft NIOSH Alert 141, Preventing Deaths and Injuries of Firefighters When Fighting Fires in Unoccupied Structures, are well intentioned; however, the specific language does not allow fire service personnel the flexibility to meet the fire service mission.

Firefighters should not die or be injured in structure fires, occupied or not. The NIOSH recommendations for personnel operating on the fireground are generally sound. All personnel, and especially officers, must use their training and experience to determine safe activities based on fireground conditions and available resources. To promulgate a standard which states, "No offensive interior attack should be made in unoccupied or unsafe structures" eliminates our ability to use judgment based on observed conditions and to take appropriate action.

The proposed standard states unoccupied structures warrant no offensive attack and must be considered expendable. Again, this type of generic statement is inappropriate in that it fails to take in a broad range of circumstances which may indicate offensive actions are appropriate. Your standard is attempting to make a strong statement about making sound judgments on the fireground. You are correct; we should not be fighting fires in some structures under certain conditions. However, I object to you issuing a standard rather than establishing training guidelines that will provide the knowledge, skills and ability for all fire

service personnel to develop situational awareness relative to risk management at incidents.

Some fire service leaders have been preaching this concept of not entering unoccupied structures. When the discussion is comprehensive, the decision is understood to be based on the situation observed by the responders on-scene. The incident commander must understand the appropriate risks related to the extent of the incident and the resources available to address the hazard. Unfortunately, some members of the fire service have interpreted this concept to mean that we should not enter any structure if it is not occupied, regardless of the fire conditions. In fact, that is what some of the verbiage in your proposed standard states. This is not good public policy.

For example, first responders arrive at a reported house fire to find a single-family, one-story residence with the family members standing on the sidewalk. The family tells you they are all out of the structure and they even have their family pets with them. The structure is unoccupied. There is no life hazard. The attic vents are producing some smoke which will intensify the longer you stand there and look at it. The interior of the house is clear of smoke. Typically, the firefighters will go in, pull the ceiling and put the fire out while protecting the contents from damage. Under the proposed standard, the responders will stay outside and the fire will burn the house down as everyone watches from the outside. The first responder's efforts will be to keep the fire from spreading to the neighboring houses.

The example above is but one of many that could be described where it would be appropriate to fight a fire in an "unoccupied" structure. The language in the standard needs to be changed to recognize that a small fire quickly extinguished may provide a greater level of firefighter safety than one that is fought defensively and grows, increasing exposure and collapse potential. Unoccupied structures might be defined in the following manner to guide fire personnel in assessing the risk/benefit gain of an offensive fire attack:

- × *Abandoned: boarded up, vandalized, unmaintained landscaping, uninhabitable. No offensive fire attack is warranted except in very small fires where the structure is not involved.*
- × *Vacant: empty of furnishings, possibly unmaintained landscaping, for sale sign. No offensive fire attack in a well-involved structure until defensive fire suppression efforts largely extinguish the fire and a structural integrity assessment can be made.*
- × *Unoccupied: well maintained and in use, but lacking occupants at the time of the fire. The lack of occupants should be confirmed by direct eye-witness reporting; i.e., the structure's occupant(s) gives direct face-to-face statement to emergency response personnel that no one is in the building. Property conservation efforts based on risk assessment.*

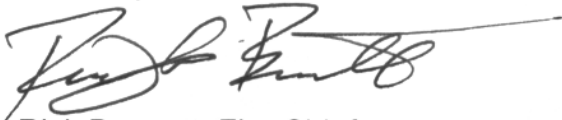
The language in the proposed standard needs to be changed to provide an understanding of when it is appropriate to enter and when it is best not to enter. Absolute statements about not entering any unoccupied structure should be eliminated from this standard.

We should train the fire service to make decisions based on a risk/benefit model and to take actions based on conditions and resources available to address the situation. If you are compelled to issue a standard, then it should not use dogmatic statements that can be miss-interpreted by fire service personnel who have not partaken of the entire discussion. A statement such as, "No offensive interior attacks should be made in unoccupied or unsafe structures" is misleading and open to interpretations that can lead to poor decision-making on the fireground.

Please do not promulgate this standard in its current format. Making an inflexible statement that we should not fight fires in unoccupied structures will only result in confusion. Rather, I encourage you to help enhance training to allow all fire service personnel to develop the ability to keep themselves, their colleagues and their communities safe through application of good risk management practices.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Bennett", with a long horizontal flourish extending to the right.

Rick Bennett, Fire Chief
Clovis Fire Department

RB:lc
(NIOSH-141)