Miller, Diane M. (CDC/NIOSH/EID)

From: --Z. [zed.group@comcast.net]

Sent: Thursday, March 05, 2009 1:49 PM

To: NIOSH Docket Office (CDC)

Subject: 141 - Draft NIOSH Alert: Preventing Deaths and Injuries of Fire Fighters When Fighting Fires in Unoccupied Structures

Hi;
I sent this to your on-line comments forum, although I am not sure that worked, so here it is in an e-mail (and I added another thought, too):

Comments submitted 3/5/09 to NIOSH on the
NIOSH Draft for the Regulations #141 for Fighting Fires in Unoccupied Structures:

I actually hope that you have a version of this comment submitted already, but in the NIOSH Draft for the regulations for Fighting Fires in Unoccupied Structures, there seems to be a big fuss about the statement "No offensive interior attacks should be made in unoccupied or unsafe structures".

To me that seems obvious; of course no offensive interior attacks should be made in unoccupied or unsafe structures! The problem is, how is it determined and by whom is it determined that a structure is "unoccupied" and/or "unsafe"?

Maybe the regulations should read something like: "Offensive interior attacks should be avoided in unoccupied or unsafe structures. When a structure is determined to be unoccupied or unsafe, offensive interior attacks should not be made."
We in the fire service are definitely not looking for "dead heroes"!

The real problem is that abandoned buildings, buildings in construction, etc., whatever their size or condition, unfortunately often are the residence of homeless people. As our economy has deteriorated, that is even more common...it is not only rats and drug addicts, it is regular people without jobs who have lost their homes; it is whole families. And in the winter, one suspects they build small "camp fires" within structures, to keep warm.

To illustrate: At dusk one day as I was photographing another building in a complex of abandoned and supposedly boarded-up large buildings near here, I was amazed to see a steady stream of "homeless residents" coming out of one of the buildings...there was a whole family, a number of couples, shopping carts and everything. They went off to scavenge the City (Northampton, Ma.) at night, I suppose. But the next day I went back to see if I could see where they lived, and there was virtually no sign of them...one shopping cart by the curb, and a stroller. A couple of holes in the cyclone fence. They had a sort of "gang plank" that they had extended from a 2nd floor window at dusk, but it was nowhere to be seen in the daylight. All of the buildings were marked with a red "X in the box".

The thing is, if there were a fire in this building, are we to run a defensive operation only? They were supposedly "unoccupied or unsafe structures", but although they were somewhat unsafe,

they were obviously occupied! In a perfect world, these structures would always be well boarded up and secured...but in a perfect world, people would have jobs and a safe place to live, too.

It also shows the critical nature of knowing your "territory", of pre-planning, and the importance of never assuming that things are what you think that they should be. There is always the need for being a detective during "size-up"...we know that in a fire situation, things are often NOT what they seem to be.

Thanks for your time, and all of your good work,

John Zimmerman

Westhampton Fire Department
Westhampton, MA

Zimmerman
48 North Road
Westhampton, MA 01027-9605