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To: NIOSH Docket Office (CDC)
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Subject: 141 - FFUS Comments

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Comments

These comments are directed towards the NIOSH Alert draft for Fighting Fires in Unoccupied Structures. My Opinion: While this is a timely document and I agree with the principle of it, I find this document to be riddled with legal ease and full of contradictions. I also feel that it does not stress what we in the fire service need - a good dose of training on common sense.

Starting on page 2 Bullet 6 - "No offensive interior attack should be made in unoccupied or unsafe structures".

Isn't that overkill? Should we ever say "never"?

We just had a fire in a vacant that was confined to one (single) kitchen cabinet. I agree that we need to vent, RIT, and uncover boarded windows for egress, etc. Yet, your document is saying...Do not allow entry to the structure or put out the cabinet (which took less than 50 gallons from a 1 ¾) using an interior or "aggressive" attack simply because it's unoccupied. This seems like political correctness and not sound tactics.

What is more dangerous a contents fire or a fire that has been allowed to include the structure itself. To this point, I think NIOSH should include warnings regarding Overhaul and Salvage operations in buildings where the structure is weakened by these "defensive" strategies. Why is it that NIOSH is very concerned for our well being during the initial attack phase of the fire? Yet we continue to kill firefighters while they are looking for hot spots under a roof that was weakened by outside master streams.

My second concern is that while this report like NFPA continues to issue "Thou shall not..." type statements, it actually goes on to contradict itself. Again read the statement on p.2. If the structure is unoccupied, no interior attack! That's what the lawyers will all say. Yet, the report uses the fire service "Risk a lot to save a lot" mantra on p 6. It discusses being aware of your surroundings while in an unoccupied structure p 7 Bullet 2. Wait a minute, why are we inside the unoccupied building? You've already said don't go inside! Page 8 Bullet 1 you discuss how to determine if the structure is unoccupied. Where in this discussion do you include the homeless and crack addicts that live in these vacant? If you live in the Northeast in January every vacant has potential for fire victims! A vacant (with no gas or electric hook up) didn't just start itself on fire. Somebody had to be in there to start the fire in the first place.

About Twenty years ago a suburb of Anchorage had a fire in a house that they "thought" was unoccupied. In fact, the daughter had come home from school early with an illness. The fire department did not do an interior attack (due to a subscription payment district rule). The girl died and the department was heavily ridiculed from the public and the fire service.

This report does not differentiate between an unoccupied vacant or an unoccupied "lived in" dwelling. Do we want a fire service that faces that kind of public scrutiny? The trapped person couldn't scream out loud or get to a window so we didn't have enough probable cause to look for victims? I can see

quick primary searches and then pulling forces out but NO interior search because it LOOKED unoccupied?