

To: Milosh Puchovsky
Secretary to the Standards Council
NFPA
1 Batterymarch Park
Quincy, MA 02169

From: Alan Brunacini
3102 W. Oranewood Ave.
Phx, AZ 85051

Subject: Request the NFPA to develop a LIMS Standard

Dear Mr. Puchovsky

I hereby request that the National Fire Protection Association create a proposed document to address incident management of local incidents as follows:

Proposed Scope: To provide a command function based standard for local incident commanders that will build the capability to manage local incidents in a way that will comply with the National Incident Management System, and be fully capable of transitioning into the NIMS ICS for major incidents.

Substantiation:

a. Provide an explanation and any evidence of the need for the new project/document

The present system for managing emergency incidents, known as the Incident Command System (ICS), was developed in the 1970s by the wildfire community to address major wildfire incidents. The system was adopted by the Department of Homeland Security after 9-11 to address the concerns of managing all types of major incidents in conjunction with the National Response Plan. The system, now known as the National Incident Management System (NIMS), is touted as being all risk, all hazard, and capable of being used on all types of incidents.

The incidents that drove the development of ICS were large scale incidents that bore more of a resemblance to a major military campaign than the typical incident that today's emergency responders face. Many believe that the key to effective management of smaller local emergencies is the proper utilization of a "shrunk down version" of the full blown ICS system. Such an understanding trivializes the challenges that local emergency responders, in particular fire chiefs, face at smaller, very fast paced and immediately dangerous local incidents.

The importance of a properly functioning local incident command system cannot be overemphasized. A review of the NIOSH fatality reports published since 1998 reveals that among traumatic fireground deaths of firefighters, over 92% identify command and control failures as a contributing factor.

The primary focus of NIMS ICS at the national level is on major incident management where planning, logistics and finance sections must be activated. NIMS integration efforts are currently focused on resource typing, certification, and interoperability, all of which are worthy (if not daunting) efforts. However, there is no effort aimed at providing local incident commanders with guidance on how to effectively use ICS on smaller incidents.

All incidents share certain similarities, but major incidents also differ significantly from local incidents:

- Major incidents resemble complex major military campaigns
- Local incidents more closely resemble small deadly street fights
- Major incidents can often be measured in days to weeks with the planning function often requiring the use of a calendar
- Local incidents are usually measured in hours, with incident action plans changing by the minute (sometimes dramatically)
- Major incidents typically encompass very large geographical areas
- Local incidents typically encompass a relatively small and very dangerous geographic area
- Major incidents involve calculated actions that revolve around the ability of logistical support to meet well planned operational needs. In fact operations can be postponed and/or coordinated around logistical issues, such as the availability of resources, weather, and other factors
- Local incidents usually contain highly hazardous conditions, that are fast paced with very compressed time frames, and these conditions often have potentially severe consequences for the hazard zone workers.
- Major incidents involve a centralized incident organization that is overseen by a bureaucracy of involved partners who share responsibility for the incident
- Local incidents involve simultaneous, decentralized, sequential and dangerous evolutions that take place within the jurisdiction of a single agency. A major focus of these local incidents is the effective establishment of command and control from the very beginning of the event to insure the safety of the hazard zone workers.

In summary, it is completely understandable that present NIMS doctrine is focused primarily on the management of major, large scale incidents, given the mission of DHS. It is also understandable that the focus of wild land-based ICS is on managing large campaign type incidents. The unfortunate result is that NIMS ICS tends to minimize – to the extent of ignoring - the unique demands placed upon the local incident commander.

What is needed is a document that will provide a local incident commander with guidance for how to effectively manage the hazard zone of a smaller incident, utilizing the basic principles of NIMS ICS, but that recognizes and respects the unique challenges that the local IC faces.

This new standard must give the local response agencies the ability to develop SOP's around the basic command functions that will effectively manage their local resource profile and will give that local agency the ability to train, apply, review and revise those SOP's based on the actual application of the functions in a real life, day to day setting.

b. Identify intended users of the new document:

Local incident commanders from organizations including fire departments, emergency medical services, police departments, dive rescue teams, technical rescue teams, ski patrols, wilderness search and rescue teams, and other emergency response organizations.

c. Identify individuals, groups and organizations that should review and provide input on the need for the proposed new document.

I recommend that the following organizations be consulted: The IAFC, IAFF, NVFC, USFA, NFA, ISFSI.

d. Identify individuals, groups and organizations that will be or could be affected, either directly or indirectly, by the proposed new document, and what benefit they will receive by having this new document available

The entire fire service will be affected by this standard.

e. Identify other related documents and projects on the subject both within NFPA and external to NFPA

INTERNAL

NFPA 1561, Standard on Emergency Services Incident Management System, is the primary document that addresses incident management. The original intent of NFPA 1561 was to provide a basis for ensuring that IMS concepts were incorporated into firefighter health and safety in recognition that effective command and control has an important impact on firefighter safety. For that reason the Technical Committee on Fire Service Occupational Safety and Health (FSOSH committee) was given oversight of NFPA 1561.

However, in the post 9-11 world, things have changed. Effective incident management through the universal adoption of ICS has become a basic tenant of the National Response Plan. The adoption of NIMS by DHS has created somewhat of a dilemma for NFPA 1561 and the FSOSH Committee. At a minimum, NFPA 1561 must be fully

compliant with NIMS ICS to remain relevant to fire service organizations, which in my opinion it is not. Yet mere compliance with NIMS ICS does not assure that firefighter health and safety concerns are addressed in the manner originally contemplated by the FSOSH Committee when 1561 was originally conceived.

In short, the technical expertise and focus of the FSOSH TC – that addresses such vitally important standards as NFPA 1500 and NFPA 1582 - does not overlay with the development of an incident management standard.

What is needed is a new technical committee that will focus solely and directly on incident management, ensuring compliance with NIMS Type 5 & 4 local overhead teams while at the same time providing the type of direction and guidance that is needed to local incident commanders.

EXTERNAL

DHS has been working on NIMS ICS, together with various supporting technologies in accordance with the National Response Plan. Any standards prepared in conjunction with this project should be in full compliance with NIMS ICS.

f. Identify the technical expertise and interest necessary to develop the document, and if the committee membership currently contains this expertise and interest

The expertise needed for the proposed document requires experience in incident command, particularly fire service based ICS at a local level. It is recommended that a new committee be formed that will focus solely on the incident management system for local hazard zones. Of particular concern is that the committee includes current incident command practitioners who are familiar with the demands being placed upon today's incident commanders in the street, as well as those with the perspective and wisdom that comes from having watched the fire service evolve over the past thirty to forty years. The demands being placed upon today's incident commander differs significantly from the demands of the past. Radio interoperability, rapid intervention crews, resource tracking and accountability, computerized pre-incident databases, and comprehensive air management all are examples of demands that have been placed on incident commanders in recent years. Inevitably these changes will continue to alter the fundamental role of incident commander in the future. It is important that the committee include current practitioners to provide a critical perspective about the present demands. To be blunt, the fire service has witnessed enough "great ideas" that work in theory but fail in reality. This is proven by the fact that as the number of structure fires continues to significantly decline nationally, the death rate of firefighters continues at the same rate. The new standard must not simply be a theoretical success, but one that works in the street and protects the local hazard zone workers in these fast paced, high hazard events.

g. Provide an estimate on the amount of time needed to develop the new document.

It is felt that much of the ground work for such a document is currently in existence and available from major fire organizations such as FDNY, Phoenix Fire Department, and other larger emergency response organizations. As such it is my belief such a document could be prepared in relatively short order.

h. Comment on the availability of data and other information that exists or would be needed to substantiate the technical requirements and other provisions of the proposed new document.

NFPA 1561, Standard on Emergency Services Incident Management System
FEMA National Incident Management System (NIMS)
DHS National Response Framework
Fire Command Program
ICS Course

Respectfully;

A handwritten signature in green ink, appearing to be 'Alan Brunacini', written over a light blue horizontal line.

Alan Brunacini