



**CALIFORNIA ASSOCIATION OF FIRE CHIEFS
Operations Section – Northern Branch**

UCD Fire/Police Building
One Shields Ave.
Davis, CA 95616

EXECUTIVE BOARD

September 27, 2008

Codes and Standards Administration
NFPA
1 Battery Park
Quincy, MA 02169-7471

RE: **Opposition** to Request for Proposal by Alan Brunacini for a “Local Incident Management System”

This letter is in response to the NFPA proposal to develop a Standard for a “Local Incident Management System”. California Fire Chiefs Association is **opposed** to a new Standard because it is in direct conflict with all progress presently made toward creating a SINGLE incident command system to be used throughout the nation, on incidents of all sizes, and by all disciplines. Additionally, there is a startling lack of justification in the proposal that coincides with what appears to be a deliberate void of factual information describing the resounding successes of ICS and NIMS.

Post September 11th, 2001, Presidential Directive #5 was developed mandating the use of the National Incident Management System-ICS (NIMS-ICS). This system was designed from the PROVEN and TESTED principles/structure of ICS to ensure that incidents OF ANY SIZE could have ANY NUMBER of agencies responding based upon the emergency call and work effectively in a multi-disciplinary command system to mitigate hazards.

The National Incident Management System is scaleable with application from an initial response for a small incident up to including large-scale incidents. The NIMS-ICS is not just for large-scale incidents as the proposal suggests for military operations. The fire service has used ICS for small and large-scale incidents from the early 1970’s. The National Fire Academy (NFA) has used this same ICS in its curriculum since the mid-1980s.

The proposal is misleading and filled with mis-information regarding NIMS-ICS.

One of the justifications cited in the proposal is that NIOSH fatality reports identify that 92% are command and control failures. This may be true in that many fire departments don't use any identifiable incident management system and certainly don't follow NFPA Standards.

The California Fire Chiefs Association – Operations Section strongly recommends against developing a new NFPA Standard and Committee, NFPA 1500 and 1561 Task Groups could add any additional information necessary to address the proposal. Also, they could add additional fire service representatives to the NFPA 1561 Task Group if needed during the next revision process.

The fire service in California has proved for over 35 years that the ICS does work for all incidents when consistently used at a local level. If the NFPA Standards Council decided to approve the proposal for the development of another NFPA Standard for the Fire Service regarding incident management; it will cause confusion for the fire service across the country having multiple NFPA Standards and pose potential life threatening impacts for firefighters.

Agencies have been conducting training in compliance with the Presidential Directive #5. A new “Local Incident Command System” would undermine the direction given by the Federal Government for ONE National Incident Management System to be used by all response agencies.

Thank you for your consideration,