Public Comment No. 5-NFPA 1710-2014 [Section No. 5.2.4.3]

5.2.4.3 Open-Air Strip Shopping Center Initial Full Alarm Assignment Capability.

Exception: Structures protected by a supervised fire sprinkler system

5.2.4.3.1

The fire department shall have the capability to deploy an initial full alarm assignment within a 480-second travel time to 90 percent of the incidents as established in Chapter 4.

5.2.4.3.2*

The initial full alarm assignment to a structure fire in a typical open-air strip shopping center ranging from 13,000 ft^2 to 196,000 ft^2 (1203 m^2 to 18,209 m^2) in size shall provide for the following:

(1) Establishment of incident command outside the hazard area for the overall coordination, direction, and safety of the initial full alarm assignment with a minimum of two members dedicated to managing this task.

(2) Establishment of two uninterrupted water supplies at a minimum of 500 gpm (1892 L/min) each for 30 minutes, with each supply line maintained by an operator.

(3) Establishment of an effective water flow application rate of 500 gpm (1892 L/min) from three handlines, each of which has a minimum flow rate of 150 gpm (568 L/min), with each handline operated by a minimum of two members to effectively and safely maintain each handline.

(4) Provision of one support member for each attack, backup, and exposure line deployed to provide hydrant hookup and to assist in laying of hose lines, utility control, and forcible entry.

(5) Provision of at least two victim search-and-rescue teams, each team consisting of a minimum of two members.

(6) Provision of at least two teams, each team consisting of a minimum of two members, to raise ground ladders and perform ventilation.

(7) If an aerial device(s) is used in operations, one member to function as an aerial operator and maintain primary control of the aerial device at all times.

(8) Establishment of an IRIC consisting of a minimum of two properly equipped and trained members.

(9) The establishment of an initial medical care component consisting of at least two members capable of providing immediate on-scene emergency medical support and transport that provides rapid access to civilians or members potentially needing medical treatment. Where this level of emergency medical care is provided by outside agencies or organizations, these agencies and organizations shall be included in the deployment plan and meet these requirements.

(10) The establishment of an RIC consisting of an officer and at least three members who are fully equipped and trained in RIC operations.

Statement of Problem and Substantiation for Public Comment

As reported in the main scientific study* supporting this standard; “The study confirmed that a properly engineered and operation fire sprinkler system drastically reduces the risk exposure for both the building occupants and the firefighters.” It goes on to note: “Moreover, sprinkler systems fail in about one in 14 [93% successes] fires.” Therefore, the NIST report infers that sprinkler systems are not reliable enough to be considered as an alternative to higher levels of fire company staffing.

The success rate of sprinklers is very difficult to track in the US since not all systems are required to be supervised. This results in two issues. Not all fires are reported since successes of one or two sprinkler heads may not be reported to the fire department and, secondly, the major cause of sprinkler failure, shut off water supply at 64%, would potentially be eliminated since the supervised system sends an alarm immediately to maintenance personnel.

As reported in “U.S. Experience with Sprinklers” (NFPA) by John Hall in June 2013; “If these human failings could be eliminated, the overall sprinkler failure rate would drop from the estimated 9% of reported fires to 0.6%. That is close to the sprinkler failure rate reported in the mid 1980s by Marryatt for Australia and New Zealand, where high

standards of maintenance were reportedly commonplace." That would equate to a 99.4% success rate. Therefore, fire sprinklers need to be recognized for their effectiveness at virtually eliminating most fire hazard in these structures.
*NIST, Report on High-Rise Fireground Field Experiments, 2013 Page 7

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JOHN R. HALL, JR.
June 2013
System shut off before the fire 64% page vi
2007-2011 High Rise Office AS 200 fires (63% of total fires) page 4
2007-2011 High Rise Residential AS 300 fires (64% of total fires) page 4
H.W. Marryatt, Fire: A Century of Automatic Sprinkler Protection in Australia and New Zealand, 1886-1986, 2nd edition, Victoria, Australia: Australian Fire Protection Association, 1988

Related Item

First Revision No. 11-NFPA 1710-2013 [New Section after 5.2.4.1.1]

Submitter Information Verification

Submitter Full Name: L. Smeby
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Submittal Date: Mon Mar 03 11:50:32 EST 2014

Committee Statement

Committee Action: Rejected

Resolution: The technical committee supports the installation of automatic fire sprinkler systems. 1.4 of the standard addesses equivalencies permitting a modified response for other than a fire due to the communities risk. The proposed wording is to vague on it application concerning response time, staffing levels. The scope of the document addresses response to a confirmed fire in an occupancy not automatic alarms or other calls. Even with a sprinkler activiation certain tasks needs to be performed e.g. smoke and water removal, overhaul, evacuation and others.

Public Comment No. 6-NFPA 1710-2014 [Section No. 5.2.4.4]

5.2.4.4 Apartment Initial Full Alarm Assignment Capability.

Exception: Structures protected by a supervised fire sprinkler system

5.2.4.4.1

The fire department shall have the capability to deploy an initial full alarm assignment within a 480-second travel time to 90 percent of the incidents as established in Chapter 4.

5.2.4.4.2

The initial full alarm assignment to a structure fire in a typical 1200 ft^2 (111 m^2) apartment within a three-story, garden-style apartment building shall provide for the following:

(1) Establishment of incident command outside the hazard area for the overall coordination, direction, and safety of the initial full alarm assignment with a minimum of two members dedicated to managing this task.

(2) Establishment of two uninterrupted water supplies at a minimum of 400 gpm (1520 L/min) each for 30 minutes, with each supply line maintained by an operator.

(3) Establishment of an effective water flow application rate of 300 gpm (1140 L/min) from three handlines, each of which has a minimum flow rate of 100 gpm (380 L/min), with each handline operated by a minimum of two members to effectively and safely maintain each handline.

(4) Provision of one support member for each attack, backup, and exposure line deployed to provide hydrant hookup and to assist in laying of hose lines, utility control, and forcible entry.

(5) Provision of at least two victim search-and-rescue teams, each team consisting of a minimum of two members.

(6) Provision of at least two teams, each team consisting of a minimum of two members, to raise ground ladders and perform ventilation.

(7) If an aerial device is used in operations, one member to function as an aerial operator and maintain primary control of the aerial device at all times.

(8) Establishment of an IRIC consisting of a minimum of two properly equipped and trained members.

(9) The establishment of an initial medical care component consisting of at least two members capable of providing immediate on-scene emergency medical support, and transport that provides rapid access to civilian or members potentially needing medical treatment. Where this level of emergency medical care is provided by outside agencies or organizations, those agencies and organizations must be included in the deployment plan and meet these requirements.

(10) The establishment of an RIC consisting of an officer and at least three members who are fully equipped and trained in RIC operations.

Statement of Problem and Substantiation for Public Comment

As reported in the main scientific study* supporting this standard; “The study confirmed that a properly engineered and operation fire sprinkler system drastically reduces the risk exposure for both the building occupants and the firefighters.” It goes on to note: “Moreover, sprinkler systems fail in about one in 14 [93% successes] fires.” Therefore, the NIST report infers that sprinkler systems are not reliable enough to be considered as an alternative to higher levels of fire company staffing.

The success rate of sprinklers is very difficult to track in the US since not all systems are required to be supervised. This results in two issues. Not all fires are reported since successes of one or two sprinkler heads may not be reported to the fire department and, secondly, the major cause of sprinkler failure, shut off water supply at 64%, would potentially be eliminated since the supervised system sends an alarm immediately to maintenance personnel.

As reported in “U.S. Experience with Sprinklers” (NFPA) by John Hall in June 2013; “If these human failings could be eliminated, the overall sprinkler failure rate would drop from the estimated 9% of reported fires to 0.6%. That is close to the sprinkler failure rate reported in the mid 1980s by Marryatt for Australia and New Zealand, where high standards of maintenance were reportedly commonplace.” That would equate to a 99.4% success rate.

Therefore, fire sprinklers need to be recognized for their effectiveness at virtually eliminating most fire hazard in these structures.
*NIST, Report on High-Rise Fireground Field Experiments, 2013 Page 7

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JOHN R. HALL, JR.
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System shut off before the fire 64% page vi
2007-2011 High Rise Office AS 200 fires (63% of total fires) page 4
2007-2011 High Rise Residential AS 300 fires (64% of total fires) page 4
H.W. Marryatt, Fire: A Century of Automatic Sprinkler Protection in Australia and New Zealand, 1886-1986, 2nd edition, Victoria, Australia: Australian Fire Protection Association, 1988

Related Item

First Revision No. 12-NFPA 1710-2013 [New Section after 5.2.4.1.1]

Submitter Information Verification

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Submittal Date: Mon Mar 03 12:12:20 EST 2014

Committee Statement

Committee Action: Rejected

Resolution: The technical committee supports the installation of automatic fire sprinkler systems. 1.4 of the standard addesses equivalencies permitting a modified response for other than a fire due to the communities risk. The proposed wording is to vague on it application concerning response time, staffing levels. The scope of the document addresses response to a confirmed fire in an occupancy not automatic alarms or other calls. Even with a sprinkler activiation certain tasks needs to be performed e.g. smoke and water removal, overhaul, evacuation and others.

Public Comment No. 7-NFPA 1710-2014 [Section No. 5.2.4.5]

5.2.4.5* High-Rise Initial Full Alarm Assignment Capability.

Exception: Structures protected by a supervised fire sprinkler system.

5.2.4.5.1

The fire department shall have the capability to deploy an initial full alarm assignment within a 610-second travel time to 90 percent of the incidents as established in Chapter 4.

5.2.4.5.2

Initial full alarm assignment to a fire in a building with the highest floor greater than 75 ft (23 m) above the lowest level of fire department vehicle access shall provide for the following:

(1) Establishment of a stationary incident command post outside the hazard area for overall coordination and direction of the initial full alarm assignment with a minimum of one officer with an aide dedicated to these tasks. All operations shall be conducted in compliance with the incident command system.

(2) Establishment of an uninterrupted water supply to the building standpipe/sprinkler connection sufficient to support fire attack operations maintained by an operator. If the building is equipped with a fire pump, one additional member with a radio shall also be sent to the fire pump location to monitor and maintain operation.

(3) Establishment of an effective water flow application rate on the fire floor at a minimum of 500 gpm (1892 L/m) from two handlines, each operated by a minimum of two members to safely and effectively handle the line.

(4) Establishment of an effective water flow application rate on the floor above the fire floor at a minimum of 250 gpm (946 L/m) from at least one handline, with each handline deployed operated by a minimum of two members to safely and effectively handle the line.

(5) Establishment of an IRIC consisting of two properly equipped and trained members two floors below the fire floor (non-IDLH atmosphere) or on the ground floor if the fire is on the second floor or below.

(6) As soon as possible, establishment of an RIC consisting of four properly equipped and trained members to replace the IRIC two floors below the fire floor (non-IDLH atmosphere) or on the ground floor if the fire is on the second floor or below.

(7) Provision of two or more search-and-rescue teams consisting of a minimum of two members each.

(8) Provision of one officer, with an aide dedicated to these tasks, to establish oversight at or near the entry point on the fire floor(s) and on the floor above the fire.

(9) Provision of two or more evacuation management teams to assist and direct building occupants with evacuation or sheltering actions, with each team consisting of a minimum of two members.

(10) Provision of one or more members to account for and manage elevator operations.

(11) Provision of a minimum of one trained incident safety officer.

(12) Provision of a minimum of one officer two floors below the fire floor to manage the interior staging area.

(13) Provision of a minimum of two members to manage member rehabilitation. At least one of the members shall be trained to the ALS level.

(14) Provision of an officer and a minimum of three members to conduct vertical ventilation operations.

(15) Provision of a minimum of one officer to manage the building lobby operations.

(16) Provision of a minimum of two members to transport equipment to a location below the fire floor.

(17) Provision of one officer to manage external base operations.

(18) Provision of a minimum of two crews trained in emergency medical services with on-scene transport capability, each crew with a minimum of two members. At least one of the members shall be trained to the ALS level.

Statement of Problem and Substantiation for Public Comment

As reported in the main scientific study* supporting this standard; “The study confirmed that a properly engineered and operation fire sprinkler system drastically reduces the risk exposure for both the building occupants and the firefighters.” It goes on to note: “Moreover, sprinkler systems fail in about one in 14 [93% successes] fires.” Therefore, the NIST report infers that sprinkler systems are not reliable enough to be considered as an alternative to higher levels of fire company staffing.
The success rate of sprinklers is very difficult to track in the US since not all systems are required to be supervised. This results in two issues. Not all fires are reported since successes of one or two sprinkler heads may not be reported to the fire department and, secondly, the major cause of sprinkler failure, shut off water supply at 64%, would potentially be eliminated since the supervised system sends an alarm immediately to maintenance personnel.
As reported in “U.S. Experience with Sprinklers” (NFPA) by John Hall in June 2013; “If these human failings could be eliminated, the overall sprinkler failure rate would drop from the estimated 9% of reported fires to 0.6%. That is close to the sprinkler failure rate reported in the mid 1980s by Marryatt for Australia and New Zealand, where high standards of maintenance were reportedly commonplace.” That would equate to a 99.4% success rate.
Therefore, fire sprinklers need to be recognized for their effectiveness at virtually eliminating most fire hazard in these structures.
*NIST, Report on High-Rise Fireground Field Experiments, 2013 Page 7

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JOHN R. HALL, JR.
June 2013
System shut off before the fire 64% page vi
2007-2011 High Rise Office AS 200 fires (63% of total fires) page 4
2007-2011 High Rise Residential AS 300 fires (64% of total fires) page 4
H.W. Marryatt, Fire: A Century of Automatic Sprinkler Protection in Australia and New Zealand, 1886-1986, 2nd edition, Victoria, Australia: Australian Fire Protection Association, 1988

Related Item

First Revision No. 13-NFPA 1710-2013 [New Section after 5.2.4.1.1]

Submitter Information Verification

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Submittal Date: Mon Mar 03 12:14:53 EST 2014

Committee Statement

Committee Action: Rejected

Resolution: The technical committee supports the installation of automatic fire sprinkler systems. 1.4 of the standard addesses equivalencies permitting a modified response for other than a fire due to the communities risk. The proposed wording is to vague on it application concerning response time, staffing levels. The scope of the document addresses response to a confirmed fire in an occupancy not automatic alarms or other calls. Even with a sprinkler activiation certain tasks needs to be performed e.g. smoke and water removal, overhaul, evacuation and others.

Public Comment No. 11-NFPA 1710-2014 [Section No. A.1.4]

A.1.4

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Nothing in this standard is intended to prohibit

~~the use of~~

an authority having jurisdiction (AHJ) from using systems, methods, or approaches of equivalent or superior performance to those prescribed by this standard.

The standard seeks to reduce injuries and loss of property and lives and increase firefighter safety. The equivalency statement allows an AHJ to use alternate means to meet these objectives if such means are equal or superior to the requirements contained in

~~this standard allows jurisdictions to use other "systems, methods, or approaches" to meet requirements of the standard if they can validate~~

the standard. The AHJ determines what systems, methods, or approaches are equivalent or superior in performance and should document this determination in writing.

Examples of other means that can be used include: a comprehensive community risk reduction (CRR) plan that includes fire and life safety education programs, code enforcement, engineering, technology, increased fixed-fire protection systems in new and existing building stock, and other local risk reduction strategies.

The AHJ should approach these assessments by reviewing the overall public fire protection and EMS system performance. It is important for policy makers and citizens to have a true picture of the potential risks facing a community and the fire department's capabilities to respond to and manage those risks. A risk-based approach to service delivery will ensure a more efficient and effective utilization of resources and improved public safety through risk reduction.

This approach should result in a CRR plan that is regularly reviewed and amended to reflect changing risks in the community. This plan is a dynamic document and it may take a number of years to meet the locally defined objectives in the plan. The planning process begins with a community risk assessment identifying the risks that are unique to the community and its firefighters. The standard defines adequate deployments for a 2000 square foot single family residence, strip mall, garden apartment, and high rise building as well as the treatment of patients using first aid, cardiopulmonary resuscitation, basic life support, advanced life support, and other medical procedures prior to arrival at a hospital or other health care facility. In developing a CRR plan, a community should take these into account, as well as its demographic, geographic, building stock, fire experience, response, hazard and economic profiles.

The next step is a determination of the strategies and tactics that the community will employ to reduce its unique risks based on the safety objectives it has established. A community should analyze its current deployment capability and response times. Deployment capability refers to the distribution and concentration of resources throughout the AHJ including staffing, equipment and fire station locations.

It is important to measure, compare, and report performance on an ongoing basis to ensure that the community's objectives are being met and determine whether the objectives are consistent with community expectations. Comparisons may be made to the standard and to the outcomes achieved by peer communities. At this point the community must decide whether it will embrace the voluntary operational objectives in the standard either formally or informally, if it has not already; accept performance outcomes that deviate from the standard; or perhaps commit to work toward the objectives in the standard over a period of time.

When determining equivalency, the AHJ should articulate the methods that were utilized to provide an equal to or superior level of service and document in writing that such are equal or superior to the requirements contained in the standard.

~~This equivalency statement is not intended to allow any jurisdiction or fire department to reduce the requirements in the standard and still claim compliance. Moreover, it specifically requires any jurisdiction relying on "equivalent" systems, methods, or approaches to validate, demonstrate, and document in writing that the standard is equal or superior to the requirements contained in this standard. The authority having jurisdiction (AHJ) determines what systems, methods, or approaches are equivalent or superior in performance. The AHJ should approach the assessment by reviewing the overall public fire protection and~~

~~EMS system performance.~~
The AHJ should review the following critical deployment components:

(1) Staffing

(2) Resources

(3) Response times

Staffing . Staffing is defined as both the number of trained personnel and their level of training. For a system to be effective and efficient, a sufficient number of appropriately trained individuals must respond to calls for assistance. The standard stipulates the required number of trained personnel and their level of training for both fire and EMS response—based on expert consensus. It also clarifies that a fire department is permitted to use automatic aid and mutual aid agreements to demonstrate suppression capability.

Resources . This deployment component involves the sufficient response of staffed resources —vehicles and equipment--and the location of fire stations that are distributed throughout the community.

Response Times . The standard defines time frames for various events and sets goals for each. There are three time components defined in the standard relating to emergency response system performance:

(1) Call Receipt and Processing Time – The interval between receipt of the emergency alarm at the public safety answering point, and the moment when the dispatcher knows sufficient information and emergency response facilities and emergency response units are notified of the emergency, defined in NFPA 1221.

(2) Turnout Time – The interval between acknowledgement of notification of the emergency by the responding unit personnel and the beginning point of response time.

(3) Travel Time – The time that begins when responding units are en route to the emergency incident (wheels rolling), and ends when responding units arrive on scene (wheels stopped at the address).

Where strict compliance with all or part of this standard is not practical, alternative methods to meeting all or part of the standard may be proposed through equivalency requests. Equivalency requests should be submitted to and approved by the AHJ. Equivalencies document conditions (deviations) from all or part of this standard. Deviations may be temporary or permanent. Equivalencies may be applicable to an entire jurisdiction or a portion of the jurisdiction.

The level of documentation necessary to support an equivalency will vary depending on the issue. As a minimum, the equivalency request will identify the portion of the jurisdiction for which the equivalency is requested, the condition at issue, the paragraph/section of the standard which addresses the issue, a discussion as to why the literal requirements of the standard cannot be met, and a discussion which justifies the conclusion that the alternate method or approach is acceptable or equivalent to what is stipulated in the standard.

If an outside agency, public or private, is utilized to develop an equivalency, then a formal agreement should be in force between the two agencies. AHJ-approved equivalencies should be tracked and trended to ensure the effectiveness of the alternate approach and reviewed annually to verify and validate that the equivalent approach still meets or exceeds the intent of the standard or specific section. During the annual review, the need for continued implementation should also be considered.

Statement of Problem and Substantiation for Public Comment

Problem: Elected city officials and city managers need a better understanding of the deployment and response time objectives in the standard and how these objectives can be achieved through equivalent means.

Good communication between the fire department and the community it serves is essential if safety objectives are going to be achieved. A community should establish performance objectives taking into account its risks and resources. In establishing these objectives, citizens and policy makers may want to know how their community's performance compares to the voluntary national standards that have been developed by NFPA for benchmarking performance and to communities they consider their peers.

The purpose of this revision to the annex is to provide much needed guidance on how the standard can be used

by governments to achieve their safety objectives. There is little or no guidance available for elected officials and city managers who need a better understanding of the deployment and response time objectives contained in the standard.

This new language also explains the relationship between community risk assessment, community risk reduction (CRR) planning and the standard and shows how mitigation and prevention tools can be integrated to help communities achieve compliance with the standard using equivalent means.

The fire service has undergone a significant evolution in recent years. Many jurisdictions have altered staff and operating methods to maintain service levels due to fiscal stress leading to calls for a new business model for fire protection and EMS services. Communities need more education on community risk assessment techniques, CRR planning, performance measurement, and data analysis to achieve better safety outcomes. Until we provide more education about the standard and equivalency and how they relate to other management techniques, the standard will continue to be ignored by a great number of jurisdictions.

This amendment to the 1710 annex is supported by:

- National League of Cities
- International City/County Management Association

Related Item

First Revision No. 3-NFPA 1710-2013 [Section No. 4.1.2.3]

Submitter Information Verification

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Committee Statement

Committee Action: Rejected

Resolution: The existing text is sufficient and addresses equivalency and the need for the jurisdiction to document the equivalency and how they meet or exceed the standard. The standard os set on the basis of a failure of the system and a fire has occured. CRR is addressed in Annex B.

Public Comment No. 13-NFPA 1710-2014 [New Section after A.5.2.2.2.1]

Community Risk Assessment

Community risk assessment begins with identification of the hazards present in the community. Given that a particular hazard exists in a community, the consequences of an emergency event (e.g. fire) in such a hazard are ultimately determined by the mitigation efforts. In other words, the consequences are the results of the combination of the risk level of the hazard, the duration and nature of the event, property loss (e.g. building damage or collapse), personal injury or loss of life, economic losses, interruption of business and related operations, and damage to the environment. These consequences are often grouped into four categories.

- Human impacts (civilian and firefighter injuries and deaths)
- Economic impacts (property loss both direct and indirect effects)
- Psychological impact (public confidence)
- Functional impact (continuity of operations)

(Fire Service Deployment: Assessing Community Vulnerability, Urban Fire Forum 2013)

Following a community hazard/risk assessment, fire service Leaders shall prepare a plan for timely and sufficient coverage of all hazards and the adverse risk events that occur. This plan is often referred to as a *Standard of Response Coverage*. Standards of Response Coverage is defined as those written policies and procedures that establish the *distribution* and *concentration* of fixed and mobile resources of an organization. (Fire Service Deployment: Assessing Community Vulnerability, Urban Fire Forum 2013).

Additional Proposed Changes

File Name	Description	Approved
Community_Risk_Paper_2013_FINAL_2lores.pdf	Fire Service Deployment: Assessing Community Vulnerability, Urban Fire Forum 2013	

Statement of Problem and Substantiation for Public Comment

this section and the associated document will clarify community risk assessment and the information to be gained for fire chiefs and command officers, as well as local government decision makers so that they can better match resources deployed to risks in the community.

Related Item

First Revision No. 13-NFPA 1710-2013 [New Section after 5.2.4.1.1]

Submitter Information Verification

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Committee Statement

Committee Action: Rejected

Resolution: See SR 2.

Public Comment No. 3-NFPA 1710-2014 [Section No. C.2.1]

C.2.1 CPSE Publications.

Center for Public Safety Excellence, 4501 Singer Court, Suite 180, Chantilly, VA 20151.

Fire and Emergency Service Self Assessment Manuals, National Fire Service Accreditation Program. ~~7th~~ 8th Edition, Commission on Fire Accreditation International, ~~2007~~ 2009 .

Commission on Fire Accreditation International *Standard of Cover,* 5th Edition, 2008.

Statement of Problem and Substantiation for Public Comment

Updating reference material edtion and date

Related Item

First Revision No. 1-NFPA 1710-2013 [Global Input]

Submitter Information Verification

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Submittal Date: Thu Feb 20 10:26:53 EST 2014

Committee Statement

Committee Action: Accepted
Resolution: SR-1-NFPA 1710-2014
Statement: Updating reference material edtion and date