DIRECTOR'S ORDER #58: STRUCTURAL FIRE MANAGEMENT

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I. Purpose and Background

The purpose of this Director's Order is to provide more detailed interpretation of the structural fire policy articulated in National Park Service Management Policies 2006 by setting forth the
operational policies and procedures necessary to establish and implement structural fire management programs throughout the National Park System.

Structural fires have caused significant damage to National Park Service property. These fires have also resulted in deaths and numerous injuries. A professional structural fire management program is essential to the protection of human life, personal property and irreplaceable cultural resources from the effects of fire.

Structural fire management is defined as the protection of people, content, structures, resources, and the landscape surrounding structures from the effects of fire. At the park level, a fully implemented and documented structural fire prevention program is the most effective way to achieve that goal.

II. Authority

Authority to issue this Director's Order is contained in the National Park Service Organic Act (16 U.S.C. 1 through 4), and the delegation of authority contained in Part 245 of the Department of the Interior Manual (DM).

This Director’s Order is intended only to improve the internal management of the NPS and is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its departments, agencies, instrumentalities or entities, its officers or employees, or any other person.

III. Management Policies

The sections of NPS Management Policies 2006 that address structural fires include:

5.3.1 Protection and Preservation of Cultural Resources: The National Park Service will employ the most effective concepts, techniques, and equipment to protect cultural resources against theft, fire, vandalism, overuse, deterioration, environmental impacts, and other threats without compromising the integrity of the resources.

5.3.1.1 Emergency Management: Measures to protect or rescue cultural resources in the event of an emergency, disaster, or fire will be developed as part of a park’s emergency operations and fire management planning processes. Designated personnel will be trained to respond to all emergencies in a manner that maximizes visitor and employee safety and the protection of resources and property.

5.3.1.2 Fire Detection, Suppression, and Post-fire Rehabilitation and Protection: The Park Service will take action to prevent or minimize the impact of wildland, prescribed, and structural fires on cultural resources, including the impact of suppression and rehabilitation activities.

In the preservation of historic structures and museum and library collections, every attempt will be made to comply with national building and fire codes. When these cannot be met
without significantly impairing a structure’s integrity and character, management and use of the structure will be modified to minimize potential hazards rather than modifying the structure itself.

Subject to the previous paragraph, when warranted by the significance of a historic structure or a museum or library collection, adequate and appropriate fire detection, warning, and suppression systems will be installed. Pre-fire plans will be developed for historic structures and buildings housing museum or library collections; these plans will be designed to identify the floor plan, utilities, hazards, and areas and objects requiring special protection. This information will be kept current and made available to local and park fire personnel.

Park and local fire personnel will be advised of the locations and characteristics of cultural resources threatened by fire and of any priorities for protecting them during any planned or unplanned fire incident. At parks with cultural resources, park fire personnel will receive cultural resource protection training. At parks that have wildland or structural fire risks and programs, cultural resource management specialists will receive fire prevention and emergency response training. Cultural resource management specialists who assist with wildland fire programs will be certified for incident management positions commensurate with their individual responsibilities.

Smoking will not be permitted in spaces housing museum or library collections or in historic structures (except those used as residences in which smoking is permitted by the park superintendent).

9.1.8 Structural Fire Protection and Suppression: Superintendents will manage structural fire activities as part of a comprehensive interdisciplinary effort to protect resources and promote the safe and appropriate public enjoyment of those resources. Fire prevention, protection, and suppression will be primary considerations in the design, construction, rehabilitation, maintenance, and operation of all facilities. Structural fires will be suppressed to prevent the loss of human life and minimize damage to property and resources. The Service’s structural fire protection and suppression program will provide, through Director’s Order #58: Structural Fire Management and Reference Manual 58, additional policy, standards, operational procedures, and accountability to meet the diverse needs and complexities of individual park units. The goal is to ensure that all national park areas receive an appropriate level of fire protection that is provided in a safe and cost-effective manner by qualified personnel.

Each superintendent will complete a structural fire assessment and develop a structural fire plan to meet park needs. Structural fire protection and suppression capabilities will be maintained in accordance with those plans. Prevention priorities will focus on occupied structures and cultural resources, with emphasis placed evenly on code compliance, early warning detection, suppression systems, and employee training and awareness.

Fire prevention through code-compliant new construction, upgrading of existing structures, standardized and regularly scheduled fire inspections, and properly installed and maintained detection and suppression systems will be the primary means of addressing and correcting
NPS structural fire deficiencies. Where these measures are not sufficient to meet park needs, agreements will be entered into with non-NPS entities capable of providing requisite fire suppression assistance. Support from neighboring fire protection organizations is encouraged, and superintendents should enter into appropriate agreements whenever possible to enhance fire-fighting capabilities. Development of a park fire brigade will be considered only when all other options have been explored and found unacceptable.

9.4.2 Museum Collections Management Facilities: Park curatorial facilities should be adapted to the needs of each park. They may share space in visitor centers or administrative office buildings, or be housed in completely separate buildings. Incorporation with facilities in which there would be a heightened danger of fire, chemical spills, and similar accidents should be avoided. Curatorial facilities will meet each collection’s special requirements for security, fire suppression, and environmental controls.

IV. Operational Policies and Procedures

A. Life safety is, and will at all times be, the first priority in all NPS structural fire management activities.

B. The NPS is committed to protecting all resources entrusted to its care, and will focus on preventing fires and minimizing the damage resulting from fires.

C. To comply with Management Policies governing structural fire management, the NPS will administer its structural fire management program in a manner that will:

1. Focus on preventing and minimizing the damage resulting from structural fires;

2. Educate employees and park partners about structural fire prevention, resource protection, and hazardous condition identification;

3. Maintain the highest standards of professional and technical expertise;

4. Integrate structural fire prevention practices with all other aspects of park management;

5. Manage structural fire incidents in accordance with the National Incident Management System (NIMS) as mandated by Homeland Security Presidential Directive (HSPD) 5 and other nationally recognized standards and procedures;

6. Assure that all construction documents are reviewed by qualified individuals to ensure that an appropriate level of fire protection is provided as required by the NPS;

7. Use the best available technology to provide early detection and suppress structure fires;

8. Whenever possible, effectively integrate the preservation of cultural and natural resources with suppression actions through the use of "minimum impact" techniques.
D. The Associate Director for Visitor and Resource Protection will issue and provide periodic revisions to a reference manual (RM-58) to help NPS managers and field staff understand and implement Departmental and Service policies applicable to structural fire management. RM-58 will contain detailed procedures emphasizing life safety, fire prevention, and suppression activities.

E. The Division Chief for Fire and Aviation Management will appoint the Branch Chief for Structural Fire. The Branch Chief will provide leadership and direction to ensure effective Service-wide implementation and administration of the program, and will disseminate information regarding advances and developments in structural fire and fire technology.

F. The superintendent of each park will designate a Park Structural Fire Coordinator (PSFC), whose training and certification requirements will be identified in RM-58. The PSFC will be knowledgeable about DO/RM-58 and the requirements identified in these documents. The PSFC will work with park management to assure they are adequately versed in the requirements and procedures contained therein.

G. A comprehensive Fire Protection Condition Assessment (FPCA) will be conducted on buildings Service-wide, as determined jointly by the Regional Structure Fire Manager (RSFM) and the Chief of Facilities at the park level, in order to provide guidance to superintendents implementing structural fire programs.

H. The NPS will adopt National Fire Protection Association (NFPA) codes and standards and recommended practices for fire prevention, protection and life safety, with exceptions and modifications as adopted in RM-58.

The purpose of following NFPA codes and standards is to prescribe minimum requirements necessary to establish a reasonable level of fire safety for visitors and employees, and to protect property and resources from the hazard created by fire. The codes and standards assist in developing requirements for building construction and design; the installation, inspection, testing, and maintenance of installed fire protection systems; and fire and life safety inspections.

As fire codes are revised, the most current version of the code will be the version that is/was current at the time a project was initiated. Compliance with new codes and standards are required any time a building changes occupancy, or is planning to undergo a significant renovation. Refer to Chapter 43 of the Life Safety Code (NFPA 101) for further clarification information.

The NPS will adopt NFPA codes and standards and recommended practices for manual fire suppression operations, with exceptions and modifications as adopted in RM-58. Where there are other NFPA documents that set standards for emergency operations, other than structural fire suppression, that conflict with NPS policy the WASO Branch Chief for Structural Fire and the respective NPS lead for the conflicting policy will meet and decide which policy should be revised to eliminate the conflict.
I. NPS-adopted standards may be at variance with state and/or local fire safety codes. Where conflicts arise between codes and standards, where practicable the Service will adhere to the more stringent requirement(s). The Service recognizes that not all structures will be in full compliance and that a performance-based approach is acceptable. A performance-based approach may also be used where the primary mission of the preservation of the facility will not be compromised, i.e. where the historic fabric is materially altered or destroyed.

J. Regional directors are hereby designated as the Authority Having Jurisdiction (AHJ), as defined in NFPA 1, within their respective regions. AHJs will be the individual responsible for enforcing DO/RM 58 and for approving designs, equipment, materials, and all procedures regarding structural fire. Regional directors may grant waivers or refer the request to the Director as the situation warrants. The regional directors may delegate, in writing, to other qualified individuals within his or her region the authority necessary for the administration of all structural fire safety and enforcement. This includes the approval of design, equipment, materials, and installations and all procedures regarding structural fire. The AHJ will be responsible for resolving conflicts between codes or standards.

K. Fire may be used to remove a structure when all safety, health, economic, and environmental considerations have been met and it has been determined that it is beneficial to the park for providing the training of fire suppression forces. Specific guidelines for using fire to remove structures will be defined in RM-58.

V. Program Requirements

To further comply with Management Policies governing structural fire management in the NPS, the Service adopts the following program requirements:

A. Planning

1. Each superintendent will ensure the completion of a comprehensive Fire Protection Condition Assessment (FPCA) on buildings, in accordance with Sec. IV.G, above, and the development of a Structural Fire Management Plan (SFMP) in accordance with guidelines and procedures outlined in RM-58 (RM-58). The FPCA is a standardized NFPA prescriptive inspection of fire and life safety systems and processes for buildings. The SFMP identifies the current situation, deficiencies and direction being taken to correct the deficiencies.

The Facility Management Software System (FMSS) is the platform to be used to track all identified fire and life safety building inspection deficiencies.

Once a draft SFMP is approved by the superintendent, the plan will be reviewed by the regional AHJ to ensure that the plan:

(a) Has life safety as its first priority.

(b) Includes structural fire management objectives that protect life, property, and resources.
2. The installation, inspection, and maintenance of all fire detection and suppression equipment are performed and documented in accordance with statutory and regulatory requirements, applicable NFPA standards, and all applicable NPS Directors Orders and Reference Manuals.

3. Changes recommended by SFMPs that involve historic structures or historic landscapes will comply with State Historic Preservation Office requirements.

B. Structural Fire Response Personnel

1. Life safety will be the first priority in all structural fire management activities.

2. Structural fire suppression personnel will:

   (a) Meet appropriate NFPA qualifications for incident assignments;

   (b) Be equipped with personal protective clothing and equipment that meets OSHA and NFPA standards;

   (c) Meet the medical standards specified in RM-58;

   (d) Where applicable, be properly trained and equipped to protect structures from wildland fire in the wildland urban interface;


C. Structural Protection from Wildland Fire

The Fire Protection Condition Assessment (FPCA), along with wildland fire assessments, will identify if there is adequate vegetation clearances around structures to provide protection from wildland fires.

Structural Fire Management will ensure integration with Wildland Fire Management, Facility Management, Commercial Services Management and Cultural and Natural Resource Management on issues of vegetation management needed for the protection of structures.

D. Cultural Resources
1. The NPS structural fire program will protect from damage or loss, to the greatest extent possible, cultural resources, including historic and prehistoric structures, museum and archival collections, and associated collection records.

2. Structural fire management programs involving cultural resources will comply with appropriate NFPA codes and standards.

3. Due to the many considerations involved in working with historic structures, all efforts to protect such structures must be multi-disciplinary in approach. It is important that all the disciplines involved in preserving and maintaining historic structures - such as Facility Management, Cultural Resources, Commercial Services, Regional Structural Fire Managers, and others - are included in decisions involving the structural fire safety of historic buildings or irreplaceable contents.

4. Buildings with collections, or as determined by the AHJ, will be provided early warning detection and suppression systems based on NFPA codes and standards and DOI and NPS policies.

5. Automatic suppression systems and detection equipment will comply with the requirements in RM-58.

E. Natural Resources

1. Due to the many considerations involved in working with natural resources, all efforts that may affect them must be multi-disciplinary in approach. It is important that all the disciplines involved in managing flammable vegetation-such as Natural Resources and Wildland Fire Management, and others-are included in decisions involving the structural fire safety of surrounding buildings.

F. Commercial Services

1. Commercial service programs will comply with NFPA codes and standards and the requirements specified in this Director's Order.

2. Commercial service programs are responsible for conducting building inspections and for the maintenance of detection, alarm and suppression systems of facilities assigned to them. The NPS will ensure that commercial service contracts contain these requirements, and will provide oversight through the NPS structural fire management program and the commercial service management evaluation process.

3. Commercial service-operated engine companies participating in structural fire suppression operations must meet the training and certification requirements specified in this Director's Order and RM-58.

4. Commercial service-operated engine companies may operate only when a current, formal written structural fire aid agreement with the park is in place.
G. Reporting

1. All NPS structural fires involving incident response, suppression action, or destruction of property must be reported in accordance with the requirements of RM-58.

2. Fire inspections, violations, systems testing and fire protection activities require documentation in accordance with the requirements of RM-58.

3. Records are to be maintained at the park in accordance with the requirements of RM-58.

H. Investigation

1. All structural fire incidents will be investigated in accordance with the requirements of RM-58.

2. If a structure fire incident requires an investigation, the Regional Director will assure compliance with Serious Accident Investigation Team (SAIT) procedures and timelines, in accordance with the requirements of RM-58.

I. Training, Qualification, and Certification

1. All NPS staff, commercial service employees, volunteers, and park partners participating in structural fire prevention or suppression must meet the training and certification requirements specified in RM-58.

2. Employee training and certification requirements will be based on parks’ structural fire complexity and will be identified in RM-58.

3. NPS structural fire classes are identified in RM-58. Course participants must successfully complete all objectives as outlined for each individual class. This will include written and, where appropriate, practical examinations.

4. In order to remain qualified, NPS structural fire personnel must maintain their skills by periodically attending fire-related training, and/or undergoing certification testing as identified in RM-58.

5. Periodic live fire training exercises are required for all fire suppression positions. Live fire training will be conducted in accordance with the NFPA standards identified in RM-58.

6. All structural fire suppression personnel must undergo medical examination, and successfully complete physical fitness and self-contained breathing apparatus fit tests in accordance with RM-58.

7. Park superintendents are responsible for verifying and certifying that their structural fire suppression personnel meet the medical, physical, position training and certification standards specified in RM-58.
8. All structural fire suppression personnel will have their training and qualification records entered into an NPS database system specified in RM-58.

9. All structural fire instructors must meet the instructor qualification standards specified in RM-58. A log of courses taught will be entered into an NPS database system for each instructor.

J. Interagency Coordination

1. Parks that rely on non-NPS entities for fire suppression will pursue assistance or aid agreements with the primary responding agencies. At a minimum, fire suppression pre-plans will be written and training will be conducted to ensure that response times are appropriate and strategies and tactics are developed to protect park resources to the extent possible.

2. A solicitor must review for legal sufficiency all agreements involving an obligation of funds or assumption of liability.

3. Agreement examples can be found in RM-58.

K. Program Review

Regional and park structural fire programs will be periodically reviewed for quality and effectiveness as required in RM-58.

L. Preparedness

Superintendents will ensure that all employees have the opportunity to receive basic structural fire prevention training as referenced in RM-58, and that those employees capable of and interested in structural fire activities, including prevention and suppression, are made available for those activities.

M. Funding

Parks will allocate ONPS and other funds for the support of the structural fire management program. Funding will be established based on priorities identified by a standardized park structural fire assessment.

---- End of Director's Order ----