



## WHITE PAPER

DATE: July 10, 2025

TO: FIREScope Board of Directors  
23300 Castle Street  
Riverside, CA 92518

FROM: FIREScope Operations Team, Task Force, and  
Structure Fire Subcommittee

SUBJECT: INDEXING STRUCTURES NOT CURRENTLY COVERED IN ICS-500

**APPROVAL: The FIREScope Board of Directors approved this White Paper on  
July 10, 2025**

### SUMMARY

The Structure Fire Subcommittee has identified several unique occupancies in which inconsistent or inaccurate indexing/labeling could cause additional challenges for firefighter accountability, fire ground operations, and/or command and control. Unique shape occupancies consist of buildings not explicitly identified in ICS-500 (e.g. U-shape, Circular, L-shaped).

In our group survey, most agencies index unique-shaped occupancies differently. Where/what are the appropriate and reasonable divisions to be used? What is a sensible division break or standard indexing in a large commercial occupancy (LCOs) or distribution warehouse (big box store or wide rise)?

### RECOMMENDATIONS

The Structure Fire Subcommittee will establish consistency when indexing incidents in unique-shaped buildings by creating a best practice document titled; ICS 502 Building Indexing.

### FISCAL IMPACTS/COST ANALYSIS

The fiscal impacts on California fire agencies adopting the document are unknown. The adopting agencies will be responsible for training their fire service members and will need to create training programs that meet the needs of the agency. Costs associated with this change may impact their established budgets.



## IMPLEMENTATION PLAN

The Structure Fire Subcommittee proposes creating a best practice document addressing various unique shaped occupancies, similar to ICS-501 Hillside Structure Fire. The Structure Fire Subcommittee will produce a best practice document titled; ICS 502 Building Indexing.

The process will consist of identifying buildings not addressed in ICS-500 requiring standardized indexing. The Structure Fire Subcommittee will establish a best practices document for indexing these buildings. The above-mentioned occupancy types will be added to the Structure Fire Subcommittee's 2025 scope of work.

## FINDINGS

The ICS-500 document creators show one method of indexing a single-row strip mall. Several methods have been used to index unique-shaped occupancies for many years, with no consistency between agencies. Many agencies attempt to use components out of the ICS-500 for indexing, but the applications have no consistency. There has been more consistency with Division A but a lack of consistency with Divisions B, C, and D.

Over the past decade, emergency incidents with large commercial occupants (LCOs) have increased. When one building has four walls that are 500' or more in length, making square footage of 250,000 square feet or greater, with 10 or more large bay doors, consistent indexing for firefighter accountability is paramount. The Home Depot fire in northern California and the Amazon distribution warehouse fire in southern California are two examples of LCOs that need consistent indexing for firefighter accountability and conducting search, rescue, and evacuation operations.

## CONCLUSION

The Structure Fire Subcommittee has identified issues with indexing unique-shaped occupancies found in every community in the state. LCOs can be found in populous areas with a large municipal fire department or in semi-remote areas with limited staffing and extended response times. National Institute Occupational Safety and Health (NIOSH) reports from Line of Duty Death (LODD) incidents recommend correcting contributing factors to the LODDs. A lack of common terminology describing the building, and its condition is often cited as a contributing factor. Consistent indexing of structures enhances the Function of Command (Size-up, initiating the communication plan, identifying the overall strategy, developing the IAP, and developing an effective ICS organization using divisions and/or groups to maintain the span of control). The first step to creating consistency was identifying the problem; the next step is to make one document to train to; implementation during emergency incidents will occur after training. The recommendations suggested are related to improving the California Fire Service in accordance with the FIRESCOPE Mission Statements.