



June 27, 2024

TO: Occupational Safety and Health Administration (OSHA)
FROM: OREGON FIRE DISTRICT DIRECTORS ASSOCIATION
RE: Comment on Proposed Revisions to Rules on Emergency Response
DOCKET NO. OSHA-2007-0073; 29 CFR 1910.155 and 156

The Oregon Fire District Directors Association (OFDDA) was formed in 1950 and serves the elected public officials of over 200 Fire Protection Districts throughout Oregon, all Special Districts formed under ORS Chapter 478. The five-member governing boards are responsible for the financial and management oversight of the Districts. They serve without compensation.

First, thank you for extending the comment period to July 22, 2024. The proposed rules represent a number of complex issues and it has taken some time to assess the impacts on rural fire protection districts. While public safety entities across the state believe in protecting their people, we have had time to further digest the proposed changes. Our determination is that the proposed language, if enacted, will be devastating, particular to smaller fire districts and departments.

The rules propose a number of new administrative tasks (such as additional record keeping and reporting) and duties for firefighters and emergency medical technicians, all of which will require additional training. And, while many districts struggle to maintain equipment, the rules dictate that some equipment, particularly PPE turnouts, SCBAs, and apparatus (including tires), be discarded even though they may have years of life left in them. And, in some cases, there may even be mandates to modify fire service facilities themselves. None of these changes are accompanied by increased funding at a time when budgets are stretched to the breaking point. In short, smaller districts, even without incurring fines and penalties, will most likely close due to increased costs.

Resources are already limited. The resulting effects of these changes will limit the ability of Oregon's fire service to provide adequate response to its citizens, delay emergency medical aid when it is most needed, and drastically reduce the personnel needed to sustain a minimum level of service. If a district is forced to close, there will be no life safety services provided to those in their time of need. This is truly a life and death situation.

On behalf of the Oregon Fire District Directors Association, we strongly urge you to take into account the devastating impact of the proposed rules, not just in Oregon, but nationwide.

Respectfully,

Joseph Morneau, President
OFDDA BOARD OF DIRECTORS



OREGON FIRE DISTRICT
DIRECTORS ASSOCIATION
EDUCATION • COORDINATION • LEGISLATION

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Director Position two and three shall be elected in even numbered years for a two-year term. Position four, five and six shall be elected in odd numbered years for a two-year term. – OFDDA Bylaws Section IV(A)(2).

Updated November 8, 2023