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July 19, 2024

The Honorable Douglas L. Parker  
Assistant Secretary of Labor  
U.S. Department of Labor  
Occupational Safety and Health Administration  
200 Constitution Avenue NW  
Washington, DC 20210

RE: New Emergency Response Standard Proposal Comments – OSHA-2007-0073-0118

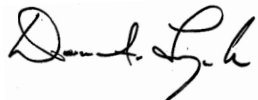
Dear Assistant Secretary Parker,

On behalf of the Virginia Association of Counties (VACo), I would like to thank you for the opportunity to comment on the proposed changes to the Occupational Safety and Health Administration (OSHA) Fire Brigades standard, 29 CFR 1910.156. Expanding these standards and potentially applying them to volunteer firefighters could create additional challenges for local governments and fire organizations already struggling to recruit and retain firefighters. While we understand the need to update the standards, we are concerned that the proposed changes, in their current form, could have a substantial impact and impose significant unfunded mandates on local fire organizations and governments.

These concerns include but are not limited to: potential increases in training and certification requirements for firefighters and officers, additional administrative tasks and documentation requirements, the need to budget for the purchase, maintenance, and replacement of firefighting apparatus, including personal protective equipment (PPE) and communication systems, infrastructure upgrades or modifications to fire department facilities, and additional liability and compliance issues.

Local governments across Virginia are struggling to maintain necessary fire services in a time of increased call volume, level state funding, and declining volunteerism. More than 70 percent of fire departments in Virginia are volunteer organizations. If the proposed rule goes through in its current form, it will pose yet one more challenge to local governments in the form of an unfunded mandate. We respectfully request that you reconsider the effect of the proposed regulations on fire departments and local governments.

Sincerely,  
Dean A. Lynch, CAE



Executive Director  
Virginia Association of Counties

CC: Virginia Association of Counties Board of Directors

1207 E. Main St., Suite 300  
Richmond, Va. 23219-3627

Phone: 804.788.6652  
Fax: 804.788.0083

Email: [mail@vaco.org](mailto:mail@vaco.org)  
Website: [www.vaco.org](http://www.vaco.org)