



July 18, 2024

Occupational Safety and Health Administration
OSHA Docket Office
Docket Number OSHA-2007-0073-0094
Room N-3508
Department of Labor
200 Constitution Avenue, NW
Washington, DC, 20001

SUBMITTED VIA ELECTRONIC COMMENT PORTAL

RE: Docket OSHA-2007-0073-0094: OSHA Proposed Fire Brigades Emergency Response Standard 29 CFR 1910.156

Dear OSHA Docket Officer:

Maryland county governments, who support both career and volunteer fire companies across our state, write to express concerns about the proposed Fire Brigades Emergency Response Standard, set to replace the current standards under 29 CFR 1910.156. We recognize that the current standards may have failed to address evolution in the field, but the broad suite of proposed new standards, and the proposal to adopt by reference an extraordinarily deep and detailed set of standards, would surely leave many of our companies out of compliance – an outcome that serves no warranted public purpose.

Maryland, like many states, already faces a crisis in recruitment and retention of firefighter personnel. The State chartered its own Commission to Advance and Strengthen Firefighting and Emergency Medical Services in Maryland in 2023, which documented an array of challenges facing this historically dependable service. While the State of Maryland and many of our counties have taken steps to address this weakness, the challenge is far from solved.

While surely well-intentioned, the proposed new Emergency Response regulations appear to be so specific, and so detailed as to render compliance either a daunting fiscal challenge, or a virtual impossibility. Career companies that already struggle with employee costs would be called upon to divert these scarce resources to comply with the range of equipment and training requirements that would be layered upon our already stout standards and practices.

Volunteer companies, already overwhelmed with opioid-related service needs skyrocketing across rural Maryland, would be doubly challenged, as their charitable fundraising cannot be readily magnified based on added cost drivers.

The Maryland Association of Counties, on behalf of its 24 member jurisdictions, urges the Administration to carefully weigh the specific modernizations needed to better reflect contemporary fire service, against the potentially overwhelming and unrealistic expectations created by the current proposed revisions. **A stakeholder-driven process incorporating practitioners of all types could provide a path forward to advance both safety and sensibility in future federal guidance.**

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Sanderson". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Michael Sanderson
Executive Director
Maryland Association of Counties