

Inter-County Association of Western New York

% Steuben County Legislature, 3 East Pulteney Square, Bath, New York 14810

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Representing the Counties of Allegany, Cattaraugus, Cayuga, Chautauqua, Chemung, Erie, Genesee, Livingston, Monroe, Niagara, Ontario, Orleans, Schuyler, Seneca, Steuben, Tompkins, Wayne, Wyoming, and Yates

RESOLUTION NO. 011-24

OPPOSING PROPOSED OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) 1910.156 REFORMS FOR FIREFIGHTERS IN NEW YORK STATE.

WHEREAS, the Inter-County Association of Western New York represents 2.9 million citizens, spread across 13,015.71 square miles of New York State, and dependent upon 528 fire departments to provide volunteer fire services to those residents; and

WHEREAS, the 528 fire departments, serve as the lifeblood of our communities, dutifully responding to thousands of calls in the preceding year, embodying the spirit of selflessness and dedication that defines these counties;

WHEREAS, the personnel of these departments, comprise the backbone of our emergency response system, tirelessly working to ensure the safety, security, and well-being of our residents, often at great personal sacrifice; and

WHEREAS, the Inter-County Association of Western New York acknowledges, with gratitude, the commendable efforts of the Occupational Safety and Health Administration (OSHA) in initiating the measures aimed at enhancing the safety and welfare of our invaluable emergency responders; and

WHEREAS, notwithstanding the strides being made in bolstering emergency responder safety, the Inter-County Association of Western New York harbors legitimate concerns regarding the future accessibility, affordability, and efficacy of emergency services within our jurisdictions.

NOW THEREFORE, BE IT

RESOLVED, the Inter-County Association of Western New York, mindful of its responsibility to safeguard the interests and welfare of its constituents, hereby expresses its reservations and respectfully requests that OSHA, in conjunction with our esteemed state and national officials, give due consideration to the following points of contention and areas of improvement pertaining to the current proposed OSHA 1910.156 document:

1. Extending the public comment period beyond the prescribed deadline of June 21, 2024 by a minimum of 45 days, thereby affording our officials adequate time to meticulously review the voluminous 608-page document and formulate comprehensive, fact-based comments reflective of our community's unique needs and circumstances;
2. Facilitating the organization and conduct of in-person public comment sessions to provide a platform for stakeholders to voice their concerns, insights, and recommendations in a transparent and inclusive manner;
3. Ensuring equitable and substantive representation of volunteer firefighters in the proposal process, proportionate to their significant contribution to emergency services nationwide, thereby fostering a balanced and representative discourse that accounts for the diverse perspectives and interests at play;
4. Simplifying and expediting the incorporation of referenced standards (22 in total) into the proposed standard to enhance clarity, accessibility, and comprehension, thereby facilitating widespread dissemination and implementation across our diverse emergency response landscape;

5. Reevaluating the intended audience and scope of the standard to accommodate the varying regulatory frameworks and classifications of volunteer firefighters across different states, and regions, ensuring equitable treatment and compliance with applicable laws and regulations;
6. Transforming the proposed standard into a dynamic, adaptive "living document" capable of evolving in tandem with emerging national needs, technological advancements, and best practices, thereby obviating the need for periodic overhauls and updates to address obsolescence and inefficiency;
7. Identifying and prioritizing additional safety measures and protocols that can be expeditiously implemented with minimal resource expenditure and manpower requirements, thereby augmenting the resilience and effectiveness of our emergency response infrastructure;
8. Collaborating closely with stakeholders to develop a standardized framework that strikes a judicious balance between economic feasibility and technical efficacy, thereby ensuring the sustainability and viability of our emergency response initiatives in the long run;
9. Instituting a formal, structured negotiation process characterized by transparency, accountability, and active engagement, thereby fostering a culture of collaboration, consensus-building, and mutual respect among all parties involved;
10. Embracing these recommendations and initiatives in a concerted effort to uphold the safety, well-being, and resilience of our dedicated emergency responders, while concurrently safeguarding the interests and resources of our taxpaying constituents.

AND BE IT FURTHER

RESOLVED, that in adopting this resolution, the Inter-County Association of Western New York reaffirms its unwavering commitment to the principles of safety, equity, and inclusivity, and pledges to work collaboratively with all relevant stakeholders to address the pressing concerns and challenges confronting our emergency response infrastructure in the pursuit of a safer, more resilient, and prosperous future for all; and be it further

RESOLVED, certified copies of this resolution shall be forwarded to the Federal Occupational Safety and Health Administration; Honorable Kathy Hochul, New York State Governor; all members of the New York State Senate; all members of the New York State Assembly; Senator Charles E. Schumer; Senator Kristen Gillibrand; Congressman Nick Langworthy; and the New York State Association of Counties.

STATE OF NEW YORK)

ss.:

COUNTY OF STEUBEN)

I hereby certify that the foregoing is a true and correct transcript of a resolution duly adopted by the Inter-County Association of Western New York while in session in Orleans County on the 16th day of August, 2024.

Dated: September 12, 2024

Bath, New York



Amanda L. Chapman, Secretary
Inter-County Association of Western New York