

Sonoma County Fire Districts' Association

June 1, 2020

Dr. David Duncan, Director
California Emergency Medical Services Authority
10901 Gold Center Drive, Suite 400
Rancho Cordova, CA 95670

Subject: Removal of the Proposed Chapter 13 Regulations

Dear Dr. Duncan,

On behalf of Sonoma County Fire Districts Association, I am asking that the proposed Chapter 13 Regulations be removed from further consideration. These proposed regulations negatively impact the California Fire Service's delivery of EMS. Among other things, the proposed regulations:

- Unlawfully change the fire service's role in EMS from statutory authorization to provide EMS in our communities to requiring permission from local EMS Agencies.
- May eliminate as many as 4,100 firefighter positions in public and fire-based ambulance transport agencies statewide.
- Give Cal EMSA too much discretion in determining how cities and counties can deploy public and private providers for local emergency medical services.
- Eliminate sub-contracting, partnerships and hybrid models for the delivery of EMS.
- May largely privatize the delivery of EMS in the State of California.

These egregious proposed regulations would not serve the residents, businesses or visitors of California. They would eliminate hundreds of millions of dollars in local government investments in EMS delivery and decimate the first response, public transport and provision of EMS care to the detriment of the health, safety and welfare of our communities statewide.

Sincerely,

Frank Treanor

President

Sonoma County Fire Districts Association

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