

## Summary of Comments and Agency Decisions

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Title: Oregon Rules for Firefighters, OAR 437-002-0182, in Division 2/L

Administrative Order Number: 4-2015

Adopted Date: October 23, 2015

Effective Date: July 1, 2016

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### **Background:**

Oregon Occupational Safety and Health Administration (Oregon OSHA), through rulemaking activities in collaboration with its Firefighter Advisory Committee (FAC), revised the Oregon Rules for Firefighters (OAR 437-002-0182) using a transitional approach to better align existing rules with more current editions of nationally recognized and accepted consensus standards and fire service industry best practices. The adopted changes include, but are not limited to, adding and removing definitions, revising the requirements for firefighting education and training, adding new requirements for protective ensemble elements, prohibiting riding on tailboards, tail steps, and running boards, updating or specifying references to National Fire Protection Association (NFPA) standards, and updating references to American National Standards Institute (ANSI) standards.

### **Summary of Comments and Agency Decisions:**

**(Please note that the following rules which received comments are numbered as adopted, agency decisions are conveyed in *italics*, and a list of the commenters is located on pages 11 & 12.)**

Written and oral comments were received during the public comment period for the proposed changes to the Oregon Rules for Firefighters, 437-002-0182. Six written comments and approximately 20 individuals (some who also provided written comments) gave oral testimony during five hearings held during May and June of 2015 (Brooks, Baker City, Redmond, Florence, and Roseburg, Oregon).

Oregon OSHA considered all comments received, and made changes to the proposed rules based on comments received that would not: (1) reduce the level of firefighter safety and health protection from the previous rules, (2) impact fire service agencies at an operational level that would necessitate technical advisement from Oregon fire service industry stakeholders, and (3) significantly add to the costs included in the proposed rule's Statement of Need and Fiscal Impact.

**437-002-0182(5) Personnel.**

Commenters: C-1.

C-1 questioned the definition of “ability” in the proposed rule. He indicated that the use of the term ability was too subjective without a definition specific to “physical ability testing” and “ability to perform assigned duties.” C-1 also indicated concern that without specific guidance, every fire department in Oregon could have a different standard, and that management would have the final decision. He also indicated that an ability test must be validated and in compliance with Equal Employment Opportunity Commission (EEOC) guidelines.

C-1 also indicated that the use of “physical capabilities” under the proposed rule that prevented employees who do not meet the levels of physical capabilities need to perform their assignment from engaging in emergency operations, was also very subjective with no definition of physical capabilities.

*Since the nature of the question could affect the operation of a fire service agency, developing definitions for “ability” and “physical capabilities” specific to firefighting would necessitate involvement from fire service stakeholders. The previous rule language was retained with minor changes; no addition definitions were added based on C-1.*

**437-002-0182(6) Employer’s Responsibility.**

**437-002-0182(7) Employee’s Responsibility.**

Commenters: C-1 and C-15.

C-1 questioned why the proposed rules changes removed employer’s and employee’s responsibility, and why the paragraph on the respiratory protection standard (2 in/2 out) was removed. C-15 expressed concern that removing the requirements under employee’s responsibility would relieve employees, who are expected to perform firefighting operations, of having to inform their employer when experiencing a health condition that would limit their capability of performing assigned duties.

*Employer and employee responsibilities were removed from the proposed rule since the majority of the requirements are covered under Division 1, 437-001-0760, Rules for all Workplaces. After considering the comments received, the adopted rule adds back these rules for their specific requirements related to firefighting. A note regarding the (2 in / 2 out) requirement was added to 437-002-0182(18), Respiratory Protection.*

**437-002-0182(10) Accountability.**

Commenters: C-1.

C-1 questioned why the proposed rule required following the 2008 edition of NFPA 1561: Standard on Emergency Services Incident Management System, and not the 2014 edition.

*The decision to adopt the 2008 edition of NFPA 1561 was made during rulemaking activities prior to the release of the 2014 edition during the rulemaking process. Since adopting the 2014 edition would necessitate involvement from Oregon fire service industry stakeholders, the proposed 2008 edition of NFPA 1561 was adopted as recommended by the FAC.*

### **437-002-0182(11) Firefighting Education and Training.**

Commenters: C-2, C-3, C-4, C-5, C-6, C-8, C-9, C-10, C-11, C-13, C-14, C-15, C-16, C-17, C-18, C-20, C-21, C-22, and C-23.

The proposed changes to firefighter education and training included requiring all firefighters who participate in interior structural firefighting activities meet the training level of Fire Fighter 1 as prescribed by NFPA 1001 (2013): Standard for Fire Fighter Professional Qualifications. Also, since the Department of Public Safety Standards and Training (DPSST) no longer prescribed the Entry-Level Firefighter curriculum, the Entry-Level distinction was removed and replaced with an equivalent level of training prescribed by NFPA 1403 (2012): Standard for Live Fire Training Evolutions (Student Prerequisites), prior to participating in live fire training or in exterior structural firefighting activities.

C-5 fully supported the proposed changes to firefighter education and training. C-5 indicated that at the national level, three recognized fire service organizations, the National Volunteer Fire Council, the North American Fire Training Directors, and the National Fallen Firefighters Foundation, have adopted position papers that support the proposed changes to firefighter training and education. C-5 also indicated that in Oregon, the Board on Public Safety Standards and Training (BPSST) addressed the level of training issue in the year 2000 through its Fire Policy Committee. The proposed changes align with BPSST's position on firefighter training.

While many commenters considered NFPA Fire Fighter 1 as a level of training for fire service agencies to strive towards, the majority of commenters indicated that requiring Fire Fighter 1 as the minimum level of training for interior structural firefighting activities would negatively impact volunteer firefighter recruitment and retention, thus potentially hindering an affected fire service agency's ability to provide service to their community. C-20 stated that "one of the difficulties of getting people to Fire Fighter 1 is the timeline and keeping interest of volunteer firefighters, which is a national problem." C-20 also indicated that his fire service agency's probationary firefighters are not allowed to do any activities unless well supervised by a senior firefighter trained to at least Fire Fighter 1. C-15 indicated that the additional training time needed is almost unachievable in a system where volunteer wash-out rate is already better than 50 percent. C-13 stated that the proposed Fire Fighter 1 requirement "will do virtually nothing to increase the survivability of interior firefighters but will exacerbate the already-difficult problem of volunteer recruitment and retention." C-13 also stated "transitioning from an existing standard that requires approximately 50 hours of training before a volunteer can be utilized on interior to one in excess of 100 hours means a typical volunteer fire department will not have those new personnel effectively available for fire combat for at least a year on average." C-13 indicated that current firefighters trained to the entry-level standard, who are already being actively used as combat interior firefighters, will no longer be able to legally participate in that mode if the proposed rule is implemented. C-19 indicated that dealing with volunteer recruitment and retention today is harder than ever and it's not going to get any easier. C-2, C-4, C-6, C-7, C-8, C-9, C-10, C-13, C-17, C-18, C-19, C-21, C-22, and C-23 supported C-13 comments.

C-16 and C-19 indicated that much like an apprentice electrician working alongside his journeyman mentor, a firefighter trained to the 1403 level could provide interior structural firefighting when under the direct supervision of a fully trained (NFPA 1001) Fire Fighter 1 or higher. C-14 stated "I believe the current NFPA 1403 standard is sufficient for firefighters' safety for interior firefighters operations." Other commenters indicated that their fire service agency performs interior structural firefighting with at a Fire Fighter 1 or higher in direct supervision of Entry-Level firefighters.

*While the adopted rule retains the training requirement for NFPA Fire Fighter I for interior structural firefighting, an option was added that allows firefighters who meet the minimum job performance requirements (Student Prerequisites) for NFPA Fire Fighter I, as prescribed by the 2012 edition of NFPA 1403, to participate in interior structural firefighting activities when under the direct supervision of a firefighter trained to NFPA (1001) Fire Fighter I or higher.*

C-10 stated “...there is a marked difference between training and certification, and I think that needs to be spelled out specifically for fire departments so that we know what we are expected to do...”

*A note was added to the adopted rules that states “Department of Public Safety Standards and Training (DPSST) certification for NFPA Fire Fighter I or higher satisfies the training requirements in 437-002-0182(11)(b) but is not required by these rules.*

Commenters had concerns about the proposed rule that requires firefighters who participate in live fire training in a structure, or in exterior structural firefighting activities must be trained to meet the minimum job performance requirements (Student Prerequisites) for NFPA Fire Fighter 1 as prescribed by NFPA 1402 (2012). As explained above, DPSST no longer prescribed the Entry-Level Firefighter curriculum, the Entry-Level distinction was removed and replaced with an equivalent level of training prescribed by NFPA 1403 (2012): Standard for Live Fire Training Evolutions (Student Prerequisites), prior to participating in live fire training or in exterior structural firefighting activities.

C-11, C-16, and C-19 indicated support for the proposed rule change requiring all live fire training to be conducted following the requirements of NFPA 1403 (2012) Standard on Live Fire Training Evolutions. These commenters, however, could not support requiring NFPA 1403 (Student Prerequisites) as the minimum level of training for firefighters who participate in exterior firefighting activities. They indicated that there should be some provisions for those trained to the 1403 level the opportunity to gain real world experience. C-14 stated “Anyone who’s conducted live fire training recently can attest to the difficulty it is to comply with all the NFPA 1403 standards.”

C-2 questioned the definition of “exterior firefighter,” and stated that “most of us don’t really know what exterior firefighting is.” C-2 indicated that his agency uses new employees to change air pack bottles and miscellaneous fire operation tasks that do not expose employees to IDLH environments or other dangers associated with firefighting. C-20 stated “there’s a lot of activities involved with structural firefighting, including exterior activities, everything from rehab to taking a hydrant, water supply. C-19 stated “I don’t think you need to be a 1403 level to do those exterior attack activities.”

*Developing a definition for “exterior firefighter” would necessitate involvement from fire service stakeholders. To prevent confusion, the adopted rules under the Firefighting Education and Training section do not use the term “exterior.” However, the intent of 437-002-0182(11)(c) still requires the minimum level of training for firefighters who participate in live fire training in a structure, or only in structural firefighting activities not covered under the adopted rule for interior structural firefighting, 437-002-0182(11)(b), to be trained to NFPA 1403 (2012) Student Prerequisites. The adopted rule defines “interior structural firefighting” as “the physical activity of fire suppression, rescue or both, inside of buildings or enclosed structures which are involved in a fire situation beyond the incipient stage.” The previous rule did not distinguish interior structural fire fighting activities from fire ground activities which take place outside a burning structure. All firefighters participating in structural fire fighting activities were required to be at least trained to Entry-Level Firefighter. The adopted rule maintains this minimum level of training with NFPA 1403 Student Prerequisites since the training level of NFPA 1403 (2012) Student Prerequisites is considered equivalent to DPSST Entry-Level Firefighter, the previous, proposed and adopted rules require an equivalent level of training.*

*The minimum training requirements in the previous and adopted rules apply to all firefighters at fire grounds where structural firefighting or live fire training is performed. Firefighters participating at fire grounds who are not at least trained to the Student Prerequisites level of NFPA 1403 (2012) must not participate in any firefighting activities that exposes them to the hazards associated with structural firefighting. Minimal violations of the training requirement for firefighters performing assigned tasks that do not expose firefighters to such hazards at a fire ground may be considered by Oregon OSHA as de minimis violations if the employer complies with the clear intent of the rule but only deviates from the requirements in a manner that has no direct or immediate relationship to employee safety or health. Oregon OSHA documents de minimis violations during inspections activities but does not cite them. Fire ground support activities that normally do not expose firefighters to the hazards associated with structural firefighting include, but are not limited to, taking hydrants, changing air pack bottles, apparatus operation, preparing apparatus to go back in service, providing emergency medical care, etc.*

C-2 and C-12 were concerned that NFPA 1403 only allows conducting one fire set for each scenario. C-12 requested additional rule language.

*The operational nature of the comments would necessitate technical advisement from fire service industry stakeholders. The rule was adopted as proposed.*

**437-002-0182(13) Body Protection.**

**437-002-0182(14) Head Protection.**

**437-002-0182(15) Hand Protection.**

**437-002-0182(16) Foot and Leg Protection.**

Commenters: C-1, C-2, C-4, C-6, C-8, C-9, C-10, C-11, C-13, C-16, C-17, C-18, C-21, C-22, and C-23.

Most of the comments on the proposed changes to body, head, hand, foot and leg protection, supported requiring all structural firefighting coats, trousers, helmets, gloves, and footwear purchased on or after July 1, 2016 to be at least equivalent to the requirements of the 2013 edition of NFPA 1971 (Standard on Protective Ensemble for Structural Fire Fighting). However, C-1 questioned allowing the continued use of turnout gear that met the 1991 edition of NFPA 1971, referencing NFPA 1851 (Standard on the Selection, Care, and the Retirement of Firefighting Ensembles for Structural Fire Fighting and Proximity Fire Fighting) that recommends retirement of protective ensembles more than 10 years old. While C-8 indicated that a 10 year retirement would be very limiting particularly for smaller fire agencies with constricted finances. C-1 recommended that gear and all ensembles should be inspected and tested by a verified independent third party service provider as defined by NFPA 1851.

*The proposed and adopted rule did not include NFPA 1851 retirement recommendations. The likely costs associated with testing firefighting ensemble elements were not included in the proposed rule's fiscal impact statement. The rules were adopted as proposed.*

C-15 recommended limiting the requirement of using chaps when operating chain saws to nonstructural or nonemergency operations.

*The proposed changes included a note under the Foot and Leg Protection section of the rules, that was adopted, that states: “Employees using chain saws for non-firefighting activities must wear chaps or leg protectors in accordance with Division 2/I, 437-002-0134, Personal Protective Equipment.”*

C-17 indicated that the new requirements for purchasing protective ensemble elements should differentiate purchases from the manufacturer or authorized dealer versus purchases from online retailers at affordable prices.

*The proposed rule did not limit how protective ensemble elements will be purchased; however, the rule does require such personal protective equipment to be at least equivalent to the requirements of the 2013 edition of NFPA 1971 when purchased.*

#### **437-002-0182(17) Eye and Face Protection.**

Commenters: C-15.

C-15 indicated that the proposed rule states that face shields are required on helmets in 437-002-0182(17)(e), but under 437-002-0182(12)(b), head protection must consist of either a face shield or goggles.

*The proposed 437-002-0182(17)(e) was changed to clarify that when face shields are used, they must be an integral part of the firefighting helmet.*

#### **437-002-0182(19) Criteria for Approved Self-Contained Breathing Apparatus (SCBA).**

Commenters: C-1.

C-1 recommended that SCBAs purchased after the rule’s effective date must meet the requirements of the 2013 edition of NFPA 1981 (Standard on Open Circuit Self-Contained Breathing Apparatus for Emergency Services).

*The costs associated requiring SCBAs to meet the requirements of the 2013 edition of NFPA 1981 were not included in the fiscal impact statement for the proposed rule. The rule was adopted as proposed.*

#### **437-002-0182(20) Personal Alert Safety System (PASS).**

Commenters: C-1.

C-1 indicated that open-circuit SCBAs with integrated PASS devices that do not meet the 1992 or later editions of NFPA 1982 (Standard on Personal Alert Safety Systems (PASS)) should be removed from service, per NFPA 1500 (Standard on Fire Department Occupational Health and Safety Program). C-1 recommended that PASS devices be equivalent to the 1993 edition of NFPA 1982.

*The costs associated with changing the proposed 1983 edition of NFPA 1982 to the 1993 edition for PASS devices were not included in the fiscal impact statement for the proposed rule. The rule was adopted as proposed.*

**437-002-0182(23) Fire Apparatus Area.**

Commenters: C-1.

C-1 stated that “currently there is no mandatory requirement for source capture systems within fire stations. Due to the carcinogenic nature of diesel exhaust, diesel exhaust source capture systems should be mandatory.”

*Employee exposure to hazard substances from vehicle exhaust are covered under Division 2, Sub. Z, 437-002-0382, Oregon Rule for Air Contaminants. The costs associated with mandating diesel exhaust source capture systems were not included in the proposed rule’s Statement of Need and Fiscal Impact. Methods to mitigate the accumulation of vehicle exhaust are included in Appendix B (Non-Mandatory), General Information and Recommendations, which includes C-1’s suggestion to seal interior doors leading to living areas.*

**437-002-0182(24) Fire Apparatus Design and Construction.**

Commenters: C-1, C-11, C-16, and C-19

C-11, C-16, and C-19 indicated support for the proposed changes to fire apparatus design and construction rules.

C-1 recommended that all new fire apparatus should be specified and ordered to meet the requirements of 2009 edition of NFPA 1901 (Standard for Automotive Fire Apparatus). C-1 also recommended that spotters for vehicles with an obstructed view to the rear should have a portable radio and be in radio contact with the driver.

*The operational nature of the recommendation would necessitate fire service stakeholders for rulemaking. The adopted rule does not reference NFPA 1901; however, the rule was changed to include portable radio communication as a method for spotters to guide drivers while backing.*

**437-002-0182(25) Fire Apparatus Operation.**

Commenters: C-1, C-2, C-4, C-6, C-8, C-9, C-10, C-11, C-13, C-14, C-16, C-17, C-18, and C-21.

The proposed changes included a rule that prohibits riding tailboards, tail steps or running boards. Commenters supported the proposed rule change. C-17 stated “we quit riding tailboards back in the ‘80s when all the other states said you shouldn’t do it, so that’s not an issue.”

*The rule prohibiting riding tailboards, tail steps or running boards was adopted as proposed.*

**437-002-0182(26) Fire Apparatus Maintenance and Repair.**

Commenters: C-1.

C-1 recommended a mechanics schedule for preventative maintenance and for what drivers must do for operational readiness, referring to NFPA 1911, section 4.5 (Inspection and Maintenance). C-1 also recommended adding a rule that requires mechanics and service personnel to meet the qualifications of NFPA 1071 (Standard for Emergency Vehicle Technician Professional Qualifications).

*The costs associated with requiring fire service agencies to ensure apparatus mechanics and service personnel to meet the qualifications of NFPA 1071 were not included in the proposed rule's Statement of Need and Fiscal Impact. The operational nature of the recommendations would necessitate involvement from fire service industry stakeholders. The proposed rule was adopted as proposed.*

**437-002-0182(28) Aerial Devices.**

Commenters: C-1.

C-1 recommended that aerial devices be annually inspected and tested according to the 2012 edition of NFPA 1911 (Standard for the Inspection, Maintenance, Testing, and Retirement of In-service Automotive Fire Apparatus) rather than the 2007 edition as proposed. They also recommended adding an additional rule for the annual testing for fire apparatus pumps according to 2012 edition to NFPA 1911, which the 2007 edition did not address.

*The costs associated with requiring fire service agencies to follow the requirements the 2012 edition of NFPA 1911 were not included in the proposed rule's Statement of Need and Fiscal Impact. The operational nature of the recommendations would necessitate involvement from fire service industry stakeholders. The rule was adopted as proposed.*

**437-002-0182(31) Testing, Maintenance and Inspection of Fire Service Equipment.**

Commenters: C-1.

C-1 requested a description of the intent of the rule:

- (a) The employer must inspect and maintain fire service equipment at least annually and perform all tests recommended by the manufacturer at the date of manufacture.**

**(b) When the manufacturer’s recommendations required under 437-002-0182(31)(a) are not available from the manufacturer, the employer must identify and follow the recommendations of an applicable consensus standard or curriculum that is nationally recognized and generally accepted by the fire service industry.**

**Note: Examples of a consensus standard or curriculum under 437-002-0182(31)(b) include, but are not limited to, NFPA standards and IFSTA manuals.**

*The intent of 437-002-0182(31) is to ensure that equipment used for structural fire service activities and emergency first response are tested, maintained, and inspected at least annually according to the equipment manufacturer’s recommendations, or according to an applicable consensus standard or curriculum that is nationally recognized and generally accepted by the fire service industry such as, but not limited to, NFPA standards and IFSTA manuals, as indicated in the rule’s note. The rule applies to all equipment used for structural fire service activities and emergency first response when specific requirements under 437-002-0182 do not exist.*

#### **Appendix A (Mandatory) Minimum Requirements for Live Fire Training.**

Commenters: C-2, C-7, and C-12.

C-12 indicated concern with following NFPA 1403 for live fire training, specifically, having separate fire scenarios for Class A and Class B fires. Since NFPA 1403 applies to both Class A and B, fire service agencies would only be able to run one scenario at a time. C-12 recommended adding language to the proposed to allow current training practices to continue. C-2 indicated that fire departments like to keep fire training evolutions going by having more than one burn at a time in different rooms to make it enjoyable for people.

*NFPA 1403 (2012) recommends sequential live fire burn evolutions. Adding language as recommended by C-12 would necessitate involvement from Oregon fire service industry stakeholders. The rule was adopted as recommended by the FAC.*

C-7 had submitted comments regarding the following two live fire training requirements:

##### **Qualified Safety Officer Must:**

- The proposed rule required safety officers to “Inspect all participants’ protective equipment prior to entry into the live fire evolution.” C-7 indicated concern that the safety officer would not be where they need to be if they are to physically inspect each individual as well as directly supervise the ignition of each live fire and training fire.

*The 2012 edition of NFPA 1403 specifies that safety officers will supervise additional safety personnel as needed. Safety officers may assign trained safety personnel to inspect all participants’ protective equipment to ensure compliance with applicable standards: protective clothing, self-contained breathing apparatus (SCBA), and personal alert safety systems (PASS).*

##### **Training Officer or employer authorized representative must:**

- The proposed rule requires training officers to “Be qualified to deliver the live fire training.” C-7 asked what that qualification is, and how do you become qualified? C-7 also questioned what emergency medical services must be on site during live fire training.

*Under the proposed and adopted definitions for the Oregon Rules for Firefighters, 'qualified' means "certified as being trained to perform a particular job or activity," while 'certified' means "attested or confirmed in a formal written statement, or someone or something officially recognized as possessing certain qualifications or meeting certain standards." The 2012 edition of the NFPA 1403 defines instructor as "an individual qualified by the authority having jurisdiction to deliver fire-fighter training, who has the training and experience to supervise students during live fire training evolutions."*

*According to NFPA 1403, "basic life support (BLS) emergency medical services shall be available on site to handle injuries." NFPA Glossary of Terms (2013 edition) defines basic life support as "a specific level of prehospital emergency medical service provided by trained responders that is focused on rapidly evaluating a patient's condition; maintaining a patient's airway, breathing, and circulation; controlling external bleeding; preventing shock; and preventing further injury or disability by immobilizing potential spinal or other bone fractures."*

## **Appendix B (Non-Mandatory) General Information and Recommendations**

Commenters: C-1 and C-13.

C-1 suggested adding another recommendation under Exhaust Gases from Apparatus to "properly seal doors leading to living area" to reduce firefighter exposures to vehicle exhaust emissions.

*The adopted rule includes C-1's suggestion: "Seal interior doorways that lead to living areas to minimize the accumulation of vehicle exhaust emissions."*

C-13 suggested to "retain the existing Entry Level Standard as the minimum training threshold for interior firefighting, but modify it to require a stipulated amount of mandatory training in the New Science of the Underwriters Laboratory and the National Institute of Standards and Technology, as it pertains to controlling the flow path and conditioning or softening the fire prior to entry."

*The majority of commenters supported C-13 comments; however, since mandating the UL and NIST tactical training would necessitate involvement from Oregon fire service industry stakeholders, the training recommendation was added to the non-mandatory Appendix B.*

**Commenters:**

**(Note: Rules which received comments are numbered as adopted.)**

- C-1 Bach, Kelly (Oregon State Fire Fighters Council)**  
437-002-0182(5),(6),(7),(9),(10),(13),(14),(15),(16),(19),(20),(23),(24),(25),(26),(28),(31)&(Appx.B)
- C-2 Bucich, Darren (McKenzie Fire & Rescue)**  
437-002-0182(11),(13),(14),(15),(16),(25)&(Appx.A)
- C-3 Blakely, Dave (Jackson County Fire District 3)**  
437-002-0182(11)
- C-4 Carnahan, John (Siuslaw Valley Fire & Rescue)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-5 Gabliks, Eriks (Department of Public Safety Standards and Training, DPSST)**  
437-002-0182(11)
- C-6 Jackson, Donald (East Umatilla County Rural Fire District)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-7 Jagoe, Brian (Siuslaw Valley Fire & Rescue)**  
437-002-0182(Appx.A)
- C-8 John, Mark (Baker City Fire Department)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-9 Kit, Mark (Hermiston Fire & Emergency Services)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-10 Langborg, Jim (Siuslaw Valley Fire & Rescue)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-11 Marcum, Eldon (Stanfield Fire District Board of Directors)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-12 McDaniel, Scott (Hillsboro Fire Department)**  
437-002-0182(Appx.A)
- C-13 Meaker, Mark (City of North Bend Fire & Rescue)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-14 Moore, Mark (Pilot Rock Fire Department and Oregon Trail Fire Training Association, District 12)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-15 Prince, Mark (Hillsboro Fire Department)**  
437-002-0182(7),(11),(14),(16)&(17)
- C-16 Sherman, Ric (Hermiston Fire & Emergency Services Board of Directors)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-17 Smith, Ron (John Day City and Rural Fire Departments)**  
437-002-0182(11),(12),(13),(14),(15),(16)&(25)
- C-18 Sneddon, Michael (Charleston Rural Fire District)**  
437-002-0182(11),(13),(14),(15),(16)&(25)

- C-19 Stanton, Scott (Hermiston Fire District and Stanfield Fire District)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-20 Tacy, John (Lebanon Fire District)**  
437-002-0182(11)
- C-21 Tipler, Marvin (Affiliation unspecified)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-22 Weitz, Dan (Baker Rural Fire District, also representing rural fire districts in Baker County: Huntington Fire Department, Keating Rural Fire District, Haines Rural Fire District, Eagle Valley Rural Fire District, North Powder Rural Fire District, Medical Springs Rural Fire District, Pine Valley Rural Fire District, and Fire Defense Board)**  
437-002-0182(11),(13),(14),(15),(16)&(25)
- C-23 Whelan, Jim (Hermiston Fire and Emergency Services)**  
437-002-0182(11),(12),(13),(14),(15)&(16)