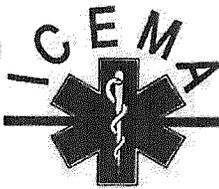


# INLAND COUNTIES EMERGENCY MEDICAL AGENCY

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July 18, 2008

Mr. Dan Smiley  
Chief Deputy Director  
State Emergency Medical Services Authority  
1930 9<sup>th</sup> Street  
Sacramento, CA 95811-7043

Dear Mr. Smiley:

**SUBJECT: DRAFT AMBULANCE EOA CRITERIA AND ZONE LISTING**

Thank you for extending the timeframe for review of the above referenced draft. The extension allowed us time to conduct a preliminary review of the draft with County Counsel.

The review revealed many questions and potential disagreements with local jurisdictions that I believe it unproductive to respond to each item individually. In short, our Counsel and I believe the proposed guidelines far exceed the statutory authority given to the Authority and attempt to impose philosophies and rules upon local County governments and EMS agencies that usurp local governmental authorities and responsibilities. Following are examples:

- The definitions and references are either inconsistent with or not codified in the Health and Safety Code.
- Interpretations of case law in these areas may or may not be applicable
- There is no statutory limitation on the length of time for ambulance contracts.
- Requiring through Guidelines that counties include gurney vans and other transport into their transportations plans that must then be approved by the EMS Authority represents an unfunded mandate (one of many I believe) and is a marked intrusion into local County governments.

I would like to suggest that EMSA establish a task force that includes EMS administrators and county counsels who have vast experience in establishing ambulance zones, as well as in the litigation that often accompanies the establishment of these areas.

We do support the establishment of Guidelines. Such Guidelines will assist all of us in understanding and standardizing the Authority's criteria and methods for evaluating our plans. ICEMA and our

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County Counsel look forward to being part of a working group to produce Guidelines that meet the needs of the Authority and that are written in accordance with statutory authorities.

ICEMA's updated Emergency Ambulance Zones matrix is included with this letter. Where possible, changed areas are noted in red. There were several obvious areas where public providers were listed as private. Additionally, we have updated the matrix to reflect what has been approved by our member counties as of this date.

Very truly yours,



VIRGINIA HASTINGS  
Executive Director

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Attachment: Emergency Ambulance Zones matrix