

March 17, 2010

Mayor Jerry Sanders
c/o Scott Chadwick, Labor Relations Director
City of San Diego
1200 3rd Avenue, Suite 1316
MS 56L
San Diego, CA 92101

Re: Teamsters Local 911 rebuttal to the fire union letter sent last week
regarding responsibilities for Cliff Rescues on behalf of the City of San
Diego Lifeguards

Dear Mayor Sanders:

The letter of February 26, 2010 from Frank De Clercq representing IAFF Local 145 to Council Member Kevin Faulconer raises several concerns regarding Fire-Rescue Department response to coastal cliff rescues. The intent of this letter is to address those concerns and to provide a clarity manifestly lacking in Mr. De Clercq's letter.

Each time the lifeguard MOU is opened or Local 145 otherwise senses vulnerability, lifeguards find themselves back in front of the City's decision makers defending our job duties and responsibilities. Each time lifeguards are subject to one of these forays from Local 145, which, incidentally, comprises members of our own Department, we take to the high road and patiently provide the decision makers with the history and context behind lifeguard job duties and why lifeguards are best suited to perform them.

In addition to ongoing attacks on lifeguard coastal cliff rescue duties, Local 145 has played a central role in attempts to take over several of our other duties. Our nationally recognized Lifeguard Swiftwater Rescue Team, for example, has for years had to defend its seemingly obvious mission of water rescue.

A move to take over our firefighting vessels was countered by pointing out the lacking qualifications among firefighters to operate these large, complex vessels in an environment where crews may be required at a moment's notice to transition to a water rescue or marine law enforcement mode. The San Diego Fire Department abandoned operation of firefighting vessels on San Diego Bay decades ago, surrendering that responsibility to San Diego

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Harbor Police. If it did not make sense for the Fire Department to operate firefighting vessels on San Diego Bay, why would it make any more sense for them to operate the vessels on Mission Bay? Yet the Lifeguard Division has had to invest resources into defending its marine firefighting function against predatory elements of the Fire-Rescue Department and the firefighters' union.

We have been subject to efforts to take away our emergency 9-1-1 dispatching function. The Department has finally come to realize that Fire Dispatchers lack the intimate geographical knowledge of the coastline to properly format critical water rescue responses. The Department's realization, however, did not come without our being forced to waste a great deal of time and energy providing justification for keeping this duty within the Lifeguard Division.

The history of the Lifeguard Service is nearly as long and just as rich as that of the Fire Department. Like San Diego Firefighters, San Diego Lifeguards are proud, highly trained, seasoned professionals. We have been a Division of the Fire-Rescue Department for just over ten years and since becoming members of the Department we have been treated as if we had just come into existence. These opportunistic incursions against our jobs duties by members of our own Department are predicated on an arrogant assumption that firefighters have the right to require lifeguards to prove their worthiness to perform duties lifeguards have performed for well over half a century.

A great deal of lip service has been paid over the last ten years by the leadership of the Fire-Rescue Department toward improving the working relationship between lifeguards and firefighters. Those efforts will remain meaningless for as long as the Department continues to expect lifeguards to disprove the assumption that firefighters should do lifeguard jobs. With that, let us, yet again, provide you with the historical context and sound reasoning behind the Lifeguard Division continuing to perform the majority of the coastal cliff rescues in the City of San Diego.

Mr. De Clercq states that Local 145 feels "that the determination of resources necessary for such events [coastal cliff rescues] is best met by allowing the Fire Chief, and not a labor contract provision, to decide the best way to provide for our citizens." That the President of IAFF Local 145, a labor union that enjoys incomparable power and influence over Fire-Rescue Department leadership, would make such a statement borders on absurd in its transparency.

Language dictating the manner in which Fire-Rescue Department resources will or will not be utilized is not unprecedented even in Local 145's MOU with

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the City. Article 13 entitled "Fire/Police Coordination", for example, dictates policy regarding how Fire-Rescue Department personnel and facilities may or may not be utilized in coordinating operations with SDPD.

The origin of the language pertaining to coastal cliff rescue in the Lifeguard MOU can be traced back to former City Manager Ray Blair. In a memorandum dated June 30, 1983, Blair summarized the findings of a review of the City's emergency response to coastal cliff rescues. Blair cited a policy in effect since 1979 delegating responsibility for daytime (9:00 am to 8:00 pm) coastal cliff rescues to the Lifeguard Service. According to Blair, "the Lifeguards have been able to safely and efficiently make approximately 80-90 percent of the cliff rescues. The Fire Department has responded on the remainder . . . I see no reason to significantly change our policy."

According to former Lifeguard Chief, B. Chris Brewster, subsequent City Managers supported maintaining the coastal cliff rescue language in the Lifeguard MOU as a means of safeguarding San Diego's citizens against unnecessary over-responses to cliff rescues by the Fire Department. According to Brewster, former City Manager Jack McGrory thought it ludicrous that every Fire Department response to a cliff rescue at Torrey Pines Beach involved a heavy rescue apparatus travelling from downtown San Diego, a practice which continues to this day.

Mr. De Clercq bases his arguments in support of taking responsibility for daytime coastal cliff rescue away from the Lifeguard Division on two issues. The first is Advanced Life Support (ALS) considerations for medical and trauma patients in the coastal cliff environment. The second is the supposed advantage of using the Fire-Rescue Department helicopter to conduct coastal cliff rescues.

Mr. De Clercq writes in bold print, "The Lifeguard MOU states that 'Firefighters will not be dispatched until requested by the Lifeguard Service.'" Mr. De Clercq's contention is that the language in the Lifeguard MOU causes delays in ALS level care for patients. While this is an accurate quote from the Lifeguard MOU, Mr. De Clercq excludes essential information that renders his assertion patently false.

Mr. De Clercq conveniently omits the fact that in addition to the language in the Lifeguard MOU, a Coastal Cliff Rescue policy exists, which applies to both the Lifeguard Division and the Fire Operations Division. Local 145 had ample time for input on this policy. In fact, implementation of the policy was delayed because Local 145 failed to respond with their input within the time allotted. The Fire Chief, of course, approved the policy. The following is an

excerpt from the Coastal Cliff Rescue policy (Fire Operations Manual, Standard Instruction 02, Section XVII):

V. RESPONSE CRITERIA

A. Lifeguard Dispatch – (0900-2000 Hours)

1. Between the hours of 0900 to 2000 hours, a coastal cliff rescue response will include:
 - a. Full rescue response by the Lifeguard Division of the Fire-Rescue Department.
2. If a coastal cliff rescue response includes a known or suspected injury, the Fire-Rescue response will include:
 - a. 1 First Responder Unit
 - b. 1 ALS Ambulance
3. Upon their arrival, the first responder unit and ALS ambulance will check in with the IC, as with any other incident.
4. Requests for additional resources will be coordinated through the IC.

Based on the Department-wide policy cited above, which is not viewed by Lifeguards as conflicting with our MOU, there is no delay in dispatching ALS resources to a Lifeguard-run cliff rescue involving a patient with a known or suspected injury.

According to Mr. De Clercq, the process of Lifeguards making the initial determination as to the level of medical response required by a cliff rescue victim “instead of assuming all cliff rescue victims are patients, delays paramedic level assessment and transport.” Lifeguards do not assume that every cliff rescue victim is a patient for one simple reason—many, if not most, cliff rescue victims are not patients. A significant proportion of people rescued on San Diego’s coastal cliffs are uninjured with no mechanism of injury to indicate trauma. These individuals either wandered off of established trails and became trapped or were stranded by large surf or incoming tides.

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For the cases that do involve injuries or suspected injuries on the coastal cliffs, Mr. De Clercq's doubt regarding the ability of lifeguards to accurately assess whether a patient requires BLS (Basic Life Support) or ALS intervention exposes a disturbing ignorance of lifeguard capabilities. In addition to a proven competence in assessing coastal cliff rescue victims for injury, each year San Diego Lifeguards rescue as many as 6000 distressed swimmers from San Diego's coastal waters, lifeguards care for hundreds of patients envenomated by stingrays and other sea life, and lifeguards respond to a myriad of miscellaneous traumatic injuries and medical emergencies occurring within their jurisdiction. In each one of these thousands of responses, patients are appropriately evaluated, treated, and either released or passed in a timely fashion to a higher level of medical care. Lifeguards would be irresponsible in the extreme to summon ALS level care for every one of these patients.

What coastal cliff rescue victims need most is a quick, efficient, and competent response by rope rescue technicians who represent the best of the discipline and who possess an intimate familiarity with the coastal cliff terrain. San Diego lifeguards are some of the most highly trained and practiced rope rescue technicians in the nation. In the rope rescue arena, the Lifeguard Division can consistently achieve in less time and with a fraction of the resources the same results as the Fire Operations Division. Most Lifeguard-run cliff rescues are achieved in less than one hour using between seven and eight lifeguards.

Much of the reason behind the lifeguards' impressive performance numbers stems from the fact that, on average, lifeguards are better trained as cliff rescue technicians than firefighters. This is a simple function of the size of the Lifeguard Division combined with a well-managed rope rescue training program. Like emergency medicine, rope rescue is a highly perishable skill. There are approximately 80 lifeguards who need to maintain competence as rope rescue technicians. Those lifeguards receive ongoing training from a Cliff Rescue Instructor cadre of eight highly trained and experienced individuals.

Lifeguard Cliff Rescue Instructors have, in fact, achieved a national reputation for excellence in the field. Through participation in non-profit instructional organizations and as adjunct instructors with Miramar College, several of our instructors teach rope rescue to firefighters, members of law enforcement, and search and rescue teams from across the nation. Lifeguard Cliff Rescue Instructors continuously conduct research to advance the field. They regularly present research finding, innovations, and advances in the field of technical rope rescue at international symposia. Lifeguard Cliff Rescue

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Instructors perform these non-city related duties on their own time, for organizations dedicated to the advancement of rope rescue skills. Fire and rescue agencies from across the country routinely contact San Diego City Lifeguards for advice and suggestions regarding cliff rescue.

The San Diego Fire-Rescue Department's Coastal Cliff Rescue policy (Standard Instruction 02.II.A.1-7) recognizes and calls for the Department to avail itself of the talents of the Lifeguard Cliff Rescue Instructors and to "cross train regularly in coastal cliff rescue." Yet not once since the policy's implementation one year ago have lifeguards been approached by Fire Operations or Fire Training to coordinate cross training.

Contrast the focused, consistent training of 80 lifeguard cliff rescue technicians with the need to maintain skill levels in rope rescue of hundreds of firefighters and the reasons behind the Lifeguard Division's superior effectiveness in cliff rescue start to become clear. Lifeguards are trained to safely access and stabilize a victim on the cliffs within ten minutes of arriving and establishing a rescue plan and are capable of victim access with as few as two lifeguards on scene.

A coastal cliff rescue response from Fire Operations, according to the same policy cited above, consists of a fire engine, a fire truck, a medic unit, a rescue apparatus, a helicopter, and a Battalion Chief. That is a minimum of 13 firefighters and 5 paramedics responding to a cliff rescue that, statistically, will involve an uninjured victim. Add to this inefficiency the fact that actual rescue operations on cliff rescues lead by the Fire Operations Division generally do not begin until Rescue 4, the City's heavy rescue apparatus, arrives from downtown.

Recently, at the insistence of Council, the Department provided data demonstrating that the Lifeguard Division is able to provide a faster response to coastal cliff rescues than the Fire Operations Division. We urge the Council to consider looking into the amount of time required to complete each rescue as well. We are confident that the data will support our assertion that not only are Lifeguards able to access cliff rescue victims more quickly, we also consistently bring victims to safety more quickly.

Based on the comparison of Lifeguard and Fire Operations responses to coastal cliff rescues, if absence of ALS capability among the lifeguard ranks is such a concern to Local 145 then perhaps Fire-Rescue Department resources would be more efficiently utilized by training a handful of lifeguards to the paramedic level. The Los Angeles County Lifeguards, a division of the Los Angeles County Fire Department has had great success with just such a

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program for many years. The taxpayers should appreciate the obvious Mayor budgetary efficiency of sending one Lifeguard Paramedic to a coastal cliff rescue versus five firefighter paramedics.

One recent article published in the respected *Journal of Emergency Medicine* even suggests that having too many paramedics at the scene of an incident is correlated with poor patient outcomes. Specifically, "the ratio of paramedics to BLS providers in a given area correlates with significantly less favorable patient outcomes than a smaller paramedic-to-BLS provider ratio." The article goes on to cite a trend among fire agencies toward discounting the importance of competent BLS-level care in favor of ALS interventions often to the detriment of the patient (*JEMS*, December 2009, Vol. 34 No. 12).

Mr. De Clercq's assertion that every cliff rescue victim, injured or not, should have immediate ALS care, especially in light of the current fiscal state in which the City finds itself, ought to raise serious concerns among the members of the council. If this is the kind of criteria advocated by Local 145 for deployment of Fire-Rescue Department resources then how many other calls for service citywide receive unnecessary resources? With rolling brown-outs in effect, Mr. De Clercq would further tax the EMS system by sending helicopters and paramedics to every uninjured person stuck on the cliffs.

We appreciate the fact that Mr. De Clercq has included the question of the Fire-Rescue helicopter in this discussion. This is another ongoing debate between the Lifeguard Division and the Fire Operations Division of which the Mayor and Council should be aware. In practice, there remains a fundamental philosophical difference between the Lifeguard Division and the Fire Operations Division regarding the appropriate use of a helicopter for coastal cliff rescues. Since the inception of the Air Operations program, the Lifeguard Division has observed a trend within the Fire Operations side of the Department toward increasing use of the helicopter even for rescues involving accessible, uninjured, stable victims.

For the record, Lifeguards are not averse to the appropriate use of the Fire-Rescue helicopter for coastal cliff rescues. When appropriate risk-benefit criteria have been met in a given cliff related incident, Lifeguard Incident Commanders are obligated by policy to utilize the helicopter (Fire Operations Manual, Standard Instruction 02, Section XVII):

VI. RISK MANAGEMENT AND RISK ASSESSMENT

A. Considerations

4. Helicopter Operations

- a. In general, ground based cliff rescue methods involve lower risk and are preferred over cliff rescues made by a helicopter.
- b. There are, however, circumstances in which the use of a helicopter is more practical, efficient and a preferred approach for rescuers.
- c. Questions to be asked when considering the use of a helicopter may include:
 - 1) Does the victim have serious traumatic injuries or a medical condition requiring an immediate evacuation (i.e. the Golden Hour)?
 - 2) Is the victim too large to move safely by ground-based methods?
 - 3) Is the victim in a location that is inaccessible via normal ground-based rescue operations?
 - 4) Is the victim in a location where extrication will take an inordinate amount of time?

Anecdotally at least, San Diego Fire Operations personnel seem to defer increasingly to the helicopter as the “easier” or “safer” way to perform a cliff rescue. This practice is in stark contrast with prevailing wisdom within the rescue industry nationally. Multiple fire, rescue, and EMS governing and advisory bodies view the use of a helicopter to perform rescue as an absolute last resort. The *Interagency Helicopter Operation Guide (IHOG)* published by the National Interagency Fire Center (2006, p. 3-4) has the following as the first question of its risk-benefit analysis tool: “Is there an alternative method that would accomplish the mission more safely and/or efficiently (including accomplishment by ground methods)?”

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According to Rescue 3 International, a leading provider of technical rescue training to fire and rescue professionals, a helicopter “is the last option that should be utilized (Swiftwater Rescue Technician I, 2006. p. 15),” and “Helicopters should be considered an extremely high-risk rescue ‘tool’, not a ‘solution’ (Swiftwater Rescue Technician I, 2006. p. 110).”

We do not deny that the San Diego Fire-Rescue helicopter is a powerful and valuable tool when applied appropriately. The citizens of San Diego are fortunate to have the benefit of this tool. The helicopter program should be justified on the merits of its appropriate applications. Justification of its use through over-use, however, is irresponsible and reckless. Use of the helicopter to rescue stable, accessible, uninjured patients from the coastal cliffs is, in most cases, not an appropriate use.

The move by IAFF Local 145 to take responsibility for daytime coastal cliff rescue away from lifeguards, like their past attempts on our job duties, has little to do with what is best for San Diego’s citizens. The political maneuvering of Local 145 in this case should be seen by the council and ultimately by the citizens of San Diego for what it is—an attempted hostile takeover of a Lifeguard Division core competency to justify demands for more compensation and resources for Local 145 members. This should not be an issue of politics. This is an issue of the well being of the citizens we all serve. On objective criteria, the Lifeguard Division is best qualified to be the Department’s primary response for daytime coastal cliff rescue.

Please give me a call if you have any questions, comments or concerns regarding this letter. I can be reached at (562) 595-4518, extension 105.

Sincerely,

Chester Mordasini
President/Business Representative

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