

**OCCUPATIONAL SAFETY
AND HEALTH STANDARDS BOARD**

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**FINAL STATEMENT OF REASONS**

CALIFORNIA CODE OF REGULATIONS

TITLE 8: Division 1, Chapter 4, Subchapter 7, Article 4, Sections 3276 and 3278
of the General Industry Safety Orders; and Subchapter 4, Article 25,
Section 1675 of the Construction Safety Orders

Single-Rail Ladders**MODIFICATIONS AND RESPONSE TO COMMENTS RESULTING FROM
THE 45-DAY PUBLIC COMMENT PERIOD**

There are no modifications to the information contained in the Initial Statement of Reasons.

SUMMARY OF AND RESPONSES TO ORAL AND WRITTEN COMMENTS:**I. Oral Comments:**

There were no oral comments at the December 15, 2011 Public Hearing in Sacramento, California.

II. Written Comments:

Mr. David Y. Shiraishi, MPH, Area Director, Occupational Safety and Health Administration (Federal OSHA), by letter dated December 5, 2011.

Comment:

Federal OSHA stated that the side-by-side code comparison prepared by Board staff indicated that 29 CFR 1910.25 does not address single-rail ladders. Federal OSHA stated that 29 CFR 1910.25(d)(2)(x) prohibits ladders made by fastening cleats to a single rail. Therefore, the proposed modifications appear commensurate with federal standards.

Response:

The Board thanks Federal OSHA for their review of this proposal, comment, and participation in the Board's rulemaking process.

ADDITIONAL DOCUMENTS RELIED UPON

None.

ADDITIONAL DOCUMENTS INCORPORATED BY REFERENCE

None.

DETERMINATION OF MANDATE

These regulations do not impose a mandate on local agencies or school districts as indicated in the Initial Statement of Reasons.

ALTERNATIVES CONSIDERED

The Board invited interested persons to present statements or arguments with respect to alternatives to the proposed regulation. No alternative considered by the Board would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the adopted action.