

**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, Section 3276 and
Article 5, Section 3287 of the General Industry Safety Orders

Use of Portable Step 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 AND RESPONSE TO ORAL AND WRITTEN COMMENTS**I. Written Comments**

Mr. Van A. Howell, CSP, Area Director, U.S. Department of Labor, Occupational Safety and Health Administration, by letter dated September 22, 2011.

Comment:

Mr. Howell stated that Federal OSHA has reviewed the proposal and found it to be commensurate with federal protections.

Response:

The Board thanks Mr. Howell for his comment and participation in the Board's rulemaking process.

II. Oral Comments

No oral comments were received at the October 20, 2011, Public Hearing in Sacramento, California.

ADDITIONAL DOCUMENTS RELIED UPON

None.

ADDITIONAL DOCUMENTS INCORPORATED BY REFERENCE

None.

DETERMINATION OF MANDATE

These standards 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 standards. 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 as and less burdensome to affected private persons than the adopted action.