



April 25, 2019

Cal/OSHA Standards Board,

In regard to the proposed Protection from Wildfire Smoke regulations (8 CCR §5141.1), on behalf of Contra Costa Water District, I would like to submit the following comments, specifically regarding the exemptions identified in section (a) 2.

During wildfire or urban fire events, water is utilized as one of the primary fire extinguishing methods. Where water infrastructure exists, water utility personnel are typically called upon by responding fire agencies to ensure adequate water flow can be provided to the specific fire location. While some of this work can be done remotely, physical on-site support of water utility employees may be required to turn valves, start generators, troubleshoot equipment, and provide on-site support to the field incident commander.

In addition to water, power supply is needed to ensure water pumps are able to function and pump water to where it is needed. While many water systems in California operate on a gravity system, nearly all require pumping to reach specific areas. In many cases, hillsides and remote areas, which are more prone to fire, rely on pumping to achieve adequate fire flows. In these cases, employees from power utilities are also called upon during fire emergencies to provide on-site response and support to fire fighters.

As currently written, section 5141.1 identifies several groups of employees which may be exempt from the section. While section D and E identify emergency responders, both clearly leave out utility employees that may be providing direct emergency support for firefighting infrastructure. We would like to propose that a subsection F be added to the exemptions listed under section (a) 2. to say the following:

(F) Water and power utility emergency response personnel aiding directly in firefighting support operations.

The addition of this exemption would ensure that water and power utility employees are able to adequately respond and support fire fighters during wildfire events.

Thank you for your consideration,

A handwritten signature in black ink that reads "Sarah Bogner". The signature is written in a cursive, flowing style.

Sarah Bogner, CSP, MS
Manager of Health and Safety
Contra Costa Water District

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