

From: [Louis Rocha](#)
To: [Berg, Eric@DIR](#); [Neidhardt, Amalia@DIR](#)
Cc: [Nicole Marquez](#); [Louis Rocha](#); [Lynn Johnson](#); [Ellen West](#)
Subject: Comments Regarding Protecting Workers from Wildfire Smoke Exposure
Date: Friday, May 10, 2019 3:29:17 PM

To Whom It May Concern:

My name is Louis H. Rocha Jr and I'm submitting these comments in regard to the proposed Emergency Standards protecting workers from wildfire smoke on behalf of the Communications Workers of America District 9.

The Communications Workers of America(CWA) District 9 represents over 10,000 workers that are employed as technicians at companies including AT&T, Frontier and Verizon. These technicians in the course of any given day are assigned work that includes performing job functions in an outdoor environment throughout California.

CWA District 9 opposes unequivocally any exemption for utility workers. In addition there should not be any lessening of training obligations but rather the required training should be increased. Merely providing a copy of Appendix A to workers is not an adequate substitute for training. The PPE required should be mandatory and the triggering AQI threshold should be at 101 and not the proposed 150. Assessing the AQI before a shift starts and periodically during a shift is appropriate and does not constitute a constant monitoring duty. The regulation should require training for any employees who will be responsible for monitoring the AQI.

In addition, CWA District 9 strongly supports the requirement for requiring fit-testing of respirators, including filtering face-piece respirators, when the AQI for PM 2.5 is 301 or greater, an air level classified as hazardous to health. Fit-testing is essential in these situations to provide workers enough protection to reduce exposures to levels “only” considered unhealthy for sensitive groups. Employers will either have to briefly postpone work to conduct the fit-testing. Employers operating in areas of high fire risk could choose to plan ahead and fit test workers ahead of time.

CWA District 9 supports the effort to increase the protection of outdoor workers from wildfire smoke exposure.

Yours respectfully,
Louis Rocha

--

Louis Rocha
Staff Representative
Communications Workers of America District 9
Mobile: (916)541-9238
Office: (916)921-4500
Email: lrocha@cwa-union.org