CALIFORNIA ACTIVE SHOOTER ACADEMY, LLC

Pre-Planning for Catastrophic Events

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WORK

PREVENTION

STANDARD - GENERAL

INDUSTRY

Kevin Graulich Senior Safety Engineer DOSH Research & Standard Health Unit 4905-2424 Arden Way Sacramento Ca 95825

RE: Workplace Violence Prevention Standard-General Industry

Dear Mr. Graulich,

I appreciate the opportunity to comment on the workplace violence prevention (WVP) standards for general industry.

As a security consultant I'm very glad to see that California is leading the nation in finding ways to mitigate workplace violence from the horrors of an active shooter. I would like to offer a few suggestions that, at present, I have not seen addressed in this standard.

While an act of gun violence can occur in nearly any location, statistics show us that 1) certain business locations are more likely to have an incident than others, and 2) the number of casualties caused by a shooting - or by the panicked rush to escape the situation - are much higher than others. For example, between 2000 and 2015 retail businesses had 46 shootings. Offices came in second at 28 events, and there were 24 active shootings in factory or warehouse workplaces. The most casualties, however, such as the Las Vegas and Orlando incidents, occurred where their were dense gatherings of people. For reasons of cost and safety, workplace prevention plans should characterize these differences.

One means of accomplishing that would be to coordinate with state and local building codes, which-are-updated every-three years.—Ingress and egress of a building or workplace should play a factor in our attempt to save lives from an active shooter and should be included in this standard - or at least coordinated with the updating of the Universal Building Code (UBC). For example, an updating of the UBC should reflect workforce and patron populations to determine increased needs to escape (run) from an active shooter. Presently, fire codes create alternative emergency fenestrations for people from which to to escape. Typically, however, a fire event has some warning and a mad rush to escape is more orderly and successful. However, the panic that naturally occurs from gun violence creates a much greater demand for escape and sheltering in place increasing the number of escape and secured opportunities would save lives from the violence itself as well as the pandemonium that occurs in an attempt to exit the building. The number of casualties at the Orlando shooting would no doubt have been less were more patrons able to escape the violence and ensuing melee. Coordinating building codes could have a meaningful impact on workplace prevention plans.

In addition, I believe that the following definitions should be added to the language to §3343. Workplace Violence Prevention standards:

DEFINITIONS:

Active Shooter

An individual actively engaged in killing or attempting to kill people in a populated area.

Places of mass gathering

A large concentration of people on a predictable basis, and include a diverse range of facilities and sites such as sporting venues, shopping /business precincts, public transport hubs and tourism/entertainment venues.

"Ultimate goal in our honest feedback is to get us closer to developing best practices for dealing with high- risk in our changing world."

I have worked in the security industry for 30 years and I believe this legislation will be truly helpful in saving lives. I appreciate the consideration of my comments and if I can be of any assistance whatsoever please let me know.

Sincerely,

Lindon Lilly, President

California Active Shooter Academy, LLC

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