

July 14, 2025

Eric Berg
Deputy Chief, Health and Research and Standards
Cal/OSHA / Division of Occupational Safety and Health
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Submitted electronically: EBerg@dir.ca.gov

RE: PROPOSED WORKPLACE VIOLENCE PREVENTION STANDARD FOR GENERAL INDUSTRY

Dear Deputy Chief Berg:

The California Chamber of Commerce and the undersigned organizations submit this letter to comment on the May 13th, 2025, draft proposed revision (the “May 13th Draft”) to the workplace violence prevention standard for general industry (generally, the “Standard”). This letter is intended to comment on changes from the previously shared draft versions of the Standard but will not reiterate all concerns in our prior coalition letter of September 3, 2024. Notably, the California Chamber of Commerce and other coalition groups were heavily involved in the negotiations and discussions around Senate Bill 553 (Cortese) (“SB 553”), passed in 2023, codified into Labor Code Section 3343, and appreciate the opportunity to share our comments on this important issue as that legislation is carried forward into a revised Standard.

As noted in our letter of September 3, 2024 (the “September 2024 Letter”), we remain concerned with the blurring of the line between workplace hazards—that are created at the workplace—and externally-created hazards which enter the workplace. We believe that workplace violence may fall into either category, depending on the factual circumstances surrounding the violence, and believe it is important to separate the two as we move forward in drafting the Proposed Regulation.

Appreciated Changes in the May 13th Draft

We appreciate the intellectual complexity, political sensitivity, and emotional difficulty surrounding the topic of workplace violence – and wanted to express our appreciation for some of the revisions made in the May 13th Draft.

1. Clarification that each listed workplace hazards and controls is not applicable to all workplaces/hazards and are provided only as examples. [Subsections (b)(3), (8), and (9)]

During the January 24th Advisory Committee conference call, coalition members raised repeated comments about the implication in that draft that any workplace hazard appeared to necessitate all workplace violence controls be implemented, regardless of the feasibility or applicability of such controls. We appreciate the additions made in the May 13th Draft to clarify that not all workplace violence controls are applicable to all workplaces or hazards.

2. Removal of Prohibition of any Undefined “Confrontation” Policies.

Particularly because of the breadth of what might constitute “confrontation” (verbal statements, for example) we appreciate the removal of this text. Under the prior language, employers were greatly concerned that we could not even have staff speak to any potential shoplifter or individual committing any potential criminal acts. Moreover, the Standard’s repeated use of staffing as workplace control made little sense because no staff members could actually take any action in regards to potential theft or violence without violating such a “confrontation” prohibition, regardless of how many staff were, in fact, present.

3. Centralization of Recordkeeping Obligations.

Ease of reading for non-lawyers and non-safety professionals is key to Cal/OSHA's regulations being understandable and implementable by the majority of businesses in California. We support the change to consolidate recordkeeping obligations in one place and thereby simplify the reading of the Standard for small businesses across California.

4. Helpful Explanations of Staff Considerations in Drafting.

We also appreciate the Division's inclusion of helpful explanations of changes contained in the May 13th Draft in boxed language, such as under 3323(b)(3) re "Engineering Controls". These notes help avoid misunderstanding and thereby improve stakeholders' ability to give helpful feedback.

Concerns with the May 13th Draft

1. Section 3343 (a) – Scope

a. Small Employer Exemption – (a)(1) Exception 6

As noted in the September 2024 letter, we remain concerned about the feasibility of the Standard for small businesses, particularly those with 10 employees or thereabouts. The obligations of the Standard are not trivial—they involve potentially acquiring new materials and devices in the workplace¹ as well as pushing businesses to hire professional security guards and more staff.² Without re-iterating the contents of our prior letter, we propose to apply the regulation to where multiple employees are present at any given time, which would mirror the legislative standard set in SB 553.

To avoid staff's concern that such compliance obligations would be "on-and-off," we would suggest that such presence be tied to a definite time period—such as a 24 hour or one-week period. In that event, if more than 10 employees were expected to be present, together, at any point during a working week at the workplace, then the Standard would apply.

As draft language, we offer the following adjustment to 3343(a) EXCEPTION 6:

EXCEPTION 6: Places of employment that are not accessible to the public if the employer meets the following conditions:

(A) Has less than a total of 10 employees at the place of employment during any given shift during a 7-day period, and ...

This addition would ensure that workplaces would be covered by the regulation if they ever experienced greater worker density but would avoid applying the regulation to a business with 10 employees, but for whom only one is present at a time and cannot afford the obligations of the regulation.

2. Section 3343 (b) - Definitions

a. Authorized Employee Representative – (b)(1)

We are glad to see a definition added to clarify this term – but believe it should match other definitions in Title 8, for two reasons: (1) consistency, and (2) because the existing definition is substantively correct. Specifically, Title 8, Section 347 (Construction Safety Orders, General Criteria) defines "authorized employee representative as follows:

¹ See proposed section 3343(b)(3) - "Engineering controls" definition, which includes potential purchasing and installation of: (A) "access controls"; (B) weapons detectors; (C) shatter or bullet-resistant glass; (D) new service counters; (E) re-organizing workspaces to facilitate speed of exit for employees; ... (H) bolting furniture to the floor; ... (K) installing more video monitoring and recording.

² See proposed sections 3343 (8)(B); (9)(K)&(L).

Authorized employee representative” means a labor organization which has a collective bargaining relationship with an employer, and which represents affected employees or an employee organization which has been formally acknowledged by a public agency as an employee organization that represents employees of the public agency. (emphasis added)

Federal OSHA also uses a similar definition³ which requires a connection to the affected employees. We would urge changes to the May 13th Draft to match the pre-existing definition in Title 8 and clarify that the definition is intended to apply to representatives of the affected employees.

Without this correction, the Standard would seem to enable any union with a collective bargaining agreement with “an employer” to utilize the provisions of the Standard – despite having no actual connection to the workplace in question.

b. Engineering Controls – (b)(3)

Here, we do not oppose the addition of subsection (J)–relating to visibility issues–to this list and see it as complementary to (K) “Video monitoring and recording”. However, the legislature is presently pursuing legislation to push back on the use of cameras in certain highly-populated parts of workplaces, including break rooms and cafeterias.⁴ We are greatly concerned that, if enacted, this legislation would slow response times for all types of violence under the Standard, but particularly Type 3 violence–and contradict the requirements of this definition.

To the extent that such legislation contradicts the Division’s policy goals of improving visibility and removing blind spots in workplaces, employers will be stuck in the middle of conflicting goals in statute and regulation. We would urge the Division to take note of, and consider engagement in, that legislative conversation.

c. Workplace Violence & Introduction of Stalking & Related Penal Code Section – (b)(7)

We are concerned with the introduction of Penal Code sections (in both proposed (b)(7)(A) & the Exception) in the May 13th Draft for multiple reasons.

First, we do not see the need to add “stalking” to the definition of workplace violence. As defined in the penal code, stalking includes far lesser conduct than the definition of workplace violence which the legislature placed in SB 553–which has been carried over into Standard’s definition of “workplace violence.” Specifically, the “stalking” penal code section referenced (Penal Code Section 646.9) includes criminalizing “harass[ment]” ...and includes conduct that relates to fear for the immediate family of the subject. Though stalking is troubling (and correctly covered under the state’s criminal law), we do not see how this conduct that may involve no threats of violence, may occur primarily outside the workplace, and may not even relate to the safety of individuals in the workplace (by including family of the subject) needs to be looped into the Standard’s definition of workplace violence, and therefore trigger employer obligations.

Second, we are concerned that Cal/OSHA inspectors–or administrative law judges–are not well-situated to apply criminal law because they have no expertise in these statutes or in the interpretative caselaw surrounding them. As noted above, the “stalking” penal code section referenced (Penal Code Section 646.9) is broadly worded and includes conduct that has no threat of violence or actual violence (“harassment”). Functionally, we are concerned that including “stalking” as workplace violence–though it does not meet the definition necessarily–will create ambiguity around businesses obligations, and invite enforcement personnel (with no background in criminal law) to cite employers for failing to act in response to what they interpret as “stalking”.

³ Section 22001.1(g) – “Authorized employee representative means a labor organization that has a collective bargaining relationship with the cited employer and that represents affected employees who are members of the collective bargaining unit.” (emphasis added)

⁴ AB 1331 (Elhawary) effectively prohibits the use of cameras in break rooms or cafeterias as of the date of this letter by requiring that such cameras cannot be monitored by the employer, and the footage cannot be recalled unless an employee in the footage requests the footage, or law enforcement requests it. This effectively prohibits live monitoring of potential workplace violence scenarios in such areas.

Third, as a legal matter, these codes were written with the process and burdens of criminal law as a backdrop—and applying their terms outside of the world of criminal law would not be appropriate. For example, in a criminal case, the prosecution must prove charges *beyond a reasonable doubt*, and the jury must *be unanimous* for a conviction to occur. With that in mind, the broad language of the statute is somewhat mitigated by the fact that a conviction is not easy to achieve. However, in Cal/OSHA's context, there is no clear mechanism to mirror the backdrop of criminal law.

To be clear: if the Standard's enforcement were to follow only confirmed convictions—e.g., where a “stalking” conviction has occurred such that the employer can clearly identify the situation, or where a temporary restraining order for such conduct has been put in place, or where a court had determined “self-defense”—then some of these concerns would be mitigated, and we would not oppose such application. But when small businesses and non-lawyer inspectors are forced to interpret criminal codes to determine compliance obligations, we are concerned.

To address this concern, we would suggest not adding the proposed text, leaving (7)(A) as below:

- (A) The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury. ~~This includes the crime of stalking as defined in California Penal Code 646.9 that occurs at a place of employment, or in connection with a place of employment that are brought to the attention of the employer or that the employer could otherwise be reasonably be aware of.~~

Notably, we do not see this as weakening worker protections against stalking, which SB 553 specifically considered and *did not* include in Labor Code Section 6401.9 (related to employers' workplace violence obligations) – and instead opted to cover via temporary restraining orders.

d. Workplace Violence & Self-Defense Penal Code – (b)(7)

The May 13th Draft also relies upon the Penal Code section related to “self-defense.” The May 13th Draft notes that this change was made “in response to comments on the need for clarification of these terms,” and “in response to comments from Cal/OSHA Enforcement observing this type of retaliation and it being a problem.”

We certainly do not oppose any worker's ability to defend themselves when in danger or when physically attacked. However, we are concerned that this language is so broad as to prevent employers from disciplining employees who create or escalate a confrontation and then are forced to resolve that situation via so-called “self-defense.” Such conflicts carry risk for not just the involved employee, but also other nearby employees, customers, and members of the public who may be injured in the resulting exchange.

For example: in a retail theft context, imagine if a thief is attempting to leave a store without paying for property, and the employer has a policy directing staff to *not physically intervene with attempted theft* because allowing the thief to exit is safer for staff, other customers, and the thieves themselves.⁵ Despite this policy, the worker physically attempts to intervene, and thereby creates a physical conflict with the thief.⁶ The worker chases the thief outside and attempts to tackle the thief, which escalates into a potentially fatal fight. As they struggle, the conflict also results in injury to a passing bystander who is knocked down and suffers a head injury.

From the employer perspective, the thief and the bystander may then *both* sue the retailer for the injuries sustained while the employee was on duty—and the retailer may face considerable liability and litigation costs as a result, despite the employee ultimately claiming “self-defense” as protection for their own criminal liability related to such injuries. Though all of this litigation and risk would be due to an employee violating an employer's policy, we are concerned that this new “self-defense” insertion would potentially make the employer liable if they chose to discipline the involved employee.

⁵ It is Cal Chamber's understanding that this policy is virtually universal among large retailers in California, due to safety concerns and liability concerns if staff should choose to intervene physically and injuries were to result.

⁶ For purposes of this example, the thief is presumed to be unarmed. However, if a firearm were involved, the danger and liability involved would be amplified.

In other words: we are concerned that this language will prevent employers from disciplining employees who may—upon their own initiative—take acts that are against company policy and unnecessarily create dangers for other staff, customers, or passing citizens.

As noted above, we also remain concerned with how this language will compel Cal/OSHA staff, who are not criminal attorneys, to interpret penal codes and apply them in the workplace.

To address these concerns – and those identified above related to inserting criminal law cross-references into Title 8 – we would propose adding the following:

- (B) The employer shall not retaliate against an employee involved in a lawful act of self-defense or defense of others. However, the employer may enforce any of its policies designed to avoid physical confrontation and prevent injuries to staff, customers, or members of the public, and may discipline any employees who violate such policies.

Though we continue to be concerned with the insertion of criminal law standards into Title 8, we believe this is the best response to protect both competing interests.

e. **Workplace Practice Controls – (b)(8)**

As noted in our September 2024 Letter, we do not believe staffing should be listed as a “work practice control” for workplace violence. We are not aware of any businesses who urge employees to confront workplace violence as a matter of policy, and do not believe that hiring more staff should be listed here. In addition, this seems to raise a question beyond the scope of Cal/OSHA’s inspectors’ expertise: how many workers should be present in a workplace (or portion of a workplace) to “make it safe,” regardless of the amount of actual labor needed in that portion of the workplace?

In addition, we do not believe that staffing should be listed both in the first sentence of the definition of “work practice controls,” and also as a listed example of a workplace practice control.

To that end, we reiterate our request that ‘Appropriate Staffing Levels’ be removed from the list of “Work Practice Controls,” as follows:

- (8) “Work practice controls” means procedures, ~~and rules,~~ ~~and staffing~~ which are used to effectively reduce workplace violence hazards. Examples of ~~work practice controls~~ include, as applicable, but are not limited to:

~~(A) Appropriate staffing levels;~~

...

f. **Workplace Violence Hazards – (b)(9)**

We agree with the move to relocate the list of workplace violence hazards to subsection (b), among other definitions. As noted in our prior letter, we continue to believe that listing items here implies that the presence of such an item immediately triggers a need to “correct” such hazards—and many of these hazards *cannot be corrected* because they are inherent to the business. To that end, we again suggest the inclusion of the following language:

...Factors to consider when identifying ~~Examples of~~ workplace violence hazards include, as applicable, but are not limited to:

In addition, we have concerns with some of the newly-created workplace violence hazards listed in subsection (b)(9)—particularly with their clarity and feasibility for employers to understand and comply with. This clarity is critical, because we expect that this list of hazards will be used in enforcement as an indication

that employers should have taken action—making employers’ ability to understand and observe them critical to the fair application of this Standard.

- **(G) Uncontrolled public access** – “Uncontrolled” is vague, and the core concept here (public contact) is already covered by (F) (“Frequent or regular contact with the public”) so we do not see the necessity or benefit from this addition.
- **(I) Working with persons with a history of violence** – This language creates an apparent hornets’ nest of liability concerns for employers. First, employers have liability issues with seeking information about past criminal history of their employees after the passage of “Ban the Box” in California (AB 1008, 2017). Second, assuming an employer is able to gain information about a formerly violent employee’s past, their ability to share that with other employees is another problem. If the intention is to deal with workplaces with unique, extreme exposure to such persons (such as prison guards) – then we would urge that such language be clarified to identify more clearly such locations.
- **(J) Hostile work environments** – Hostile work environment is a type of workplace harassment, covered by California’s Fair Employment and Housing Act (FEHA).⁷ Notably, we do not see harassment as synonymous with threats of violence. Further, we share concerns here that Cal/OSHA’s inspectors – who are not labor law attorneys – will now be in a position to guess whether conduct qualifies as a hostile work environment and therefore required workplace controls to be implemented. For those reasons, we would urge that hostile work environment claims be left in the domain of existing enforcement. Notably, employers already have an obligation to address any such issues under existing law, so it is unclear why the May 13th Draft needs to include such language. Furthermore, we are concerned that this item (J) appears to drift from physical workplace factors that improve or lessen safety to theoretical emotional causes of violence, which are far more complicated and far less appropriate to handle via Title 8 regulation.
- **(M) Required and excessive overtime** – We do not understand the connection between “required” or “excessive” overtime with workplace violence. Businesses may have an unexpected spike in work, or experience difficulty hiring in a competitive market, and that has no relation to workplace violence risks. Furthermore, we do not understand what standard would be applied to determine when overtime was “required” or “excessive,” or how Cal/OSHA inspectors would be qualified to make such workforce determinations. As noted above, this item also appears to be a significant expansion from focusing on the physical safety of workers (which is Cal/OSHA’s focus and expertise) to hypothetical psychological stress, which is not Cal/OSHA’s expertise or purview.
- **(N) High crime areas** – Here we again have practical concerns. First, identifying when it is triggered; what “high crime” list would serve as a dependable metric for employers to rely on? Creation or publication of such lists is inconsistent across law enforcement agencies in California. Moreover, even when such an online database is created, we are unaware of any which allow sorting by types of crimes. For example: a so-called “crime map” of San Francisco might show high crime throughout mostly residential neighborhoods like the Inner Richmond – but this is only because of property crime, such vehicular break-ins. That map would be entirely inapplicable to workplace violence – but would employers need to treat it as indicating a hazard? In addition, because there is no standard for such maps or listings across departments (or non-profits), how are small employers⁸ to keep track of such designations? Furthermore, we are concerned with the multiple sources of information which the proposed language would seem to cover – and thereby obligate an employer to monitor. The suggested language permits area designations by law enforcement agencies (which we will presume are perfectly accurate and keep their data updated regularly), “other governmental agenc[ies]”, and “non-governmental community crime maps.” We are concerned that including such groups here would imply that employers should be on the lookout

⁷ See California Government Code 12932; California Civil Jury Instruction No. 2521A. Work Environment Harassment.

⁸ In this case, the regulation at issue applies to employers with 11 employees.

for (and take action because of) crime maps produced by groups with questionable credibility and knowledge,⁹ and which may actually have conflicting conclusions.

- **(O) Provide Security Services** – We are unclear what is intended by this section and would ask for clarification. Is this intended to target certain employers who are in the business of providing security, such as professional security guards or prison guards? Or is this intended to apply to any employer who *chooses* to retain security guards to comply with the Standard? As written, it is unclear, and we would ask for it to be clarified. Between the two, we would understand its inclusion if it were re-written to apply to those employers whose primary business is providing security services, such as prisons, private security guards, cash transportation services, etc. However, if it is applied broadly to any employer who chooses to retain security guards, we would oppose its inclusion as effectively punishing employers for attempting to make their workplaces safer.

Putting all of the above comments together, we would urge the following changes to the May 13th Draft:

- (5) Workplace violence hazards means workplace conditions that may increase the risk of a workplace violence incident at the workplace. Examples of workplace violence hazards include, as applicable, but are not limited to:
 - (A) Employees working alone or in locations isolated from other employees;
 - (B) Areas with poor illumination or blocked visibility (e.g. blind spots) of surrounding areas;
 - (C) Entries to places of employment where unauthorized access can occur;
 - (D) Work locations, areas, or operations that lack effective escape routes;
 - (E) Exchange of money or valuable goods;
 - (F) Frequent or regular contact with the public;
 - ~~(G) Uncontrolled public access;~~
 - (H) Working late at night or early morning;
 - ~~(I) Working with persons with a history of violence;~~
 - ~~(J) Hostile work environments;~~
 - (K) Inadequate staffing;
 - (L) Lack of or inadequate security staffing;
 - ~~(M) Required and excessive overtime;~~
 - ~~(N) High crime areas as determined by local law enforcement, other governmental agency, or other non-governmental community crime maps, as applicable.~~
 - (O) Provide security services as their primary business;
 - (P) Selling, distributing, or providing alcohol, marijuana, or pharmaceutical drugs.

g. **Communication – Reporting of Workplace Violence Concerns – (c)(6)(A)(2)**

The May 13th Draft includes a new obligation which needs to be clarified and narrowed-employees must be able to make reports “to a designated person who is not a direct supervisor for type 3 violence.” This language, as written, has a few problems.

First, it prohibits reporting to “a” direct supervisor, meaning any supervisor of any employee cannot receive the report. This may be functionally impossible, as it would seem to require that workers must be able report to someone who supervises no one and therefore is not “a direct supervisor.”

Second, it seems to lump all Type 3 violence together, meaning that any employee-related violence could not be reported to anyone who is a direct supervisor. Consider a dispute between two coworkers who are under the same supervisory chain-but where the manager was completely uninvolved. It would seem only

⁹ Though the instinctive response to our concerns is likely “Well, don’t trust the ones that don’t look very professional,” we do not find that helpful. Such an answer puts the burden on employers to determine which crime maps might be credible and might not, and either take (or not take) action based on that guess ... and hope that Cal/OSHA inspectors come to the same conclusion regarding the credibility of given maps. This sort of “guessing about compliance” is not good drafting, and creates liability risks even for employers doing their best to comply. Moreover, many employers (particularly small employers) do not have the experience or knowledge to make such an analysis.

natural to report the Type 3 violence to the direct supervisor. However, in a situation involving the supervisor, then we certainly understand the desire to avoid compelling a complaining employee to report to the involved supervisor.

Third, for truly small businesses-such as those with 11 employees-it may be impossible not to involve an involved supervisor in the process of reporting. Indeed, there may be no one else to whom such a complaint can be brought.¹⁰

These both seem to be unintentional consequences of the language. Understanding the concern to be situations wherein a victim of workplace violence may feel uncomfortable reporting the incident to an involved supervisor, we would revise the language as follows:

Employers shall ensure that reports can be made:

1. In a manner that does not discourage reporting.
2. ~~For Type 3 violence involving a supervisor, to a designated person who is not a-the~~
direct supervisor of the reporting worker if for type 3 violence supervisor is the subject
of the complaint or report, if possible.

h. Post-Incident Response – (c)(11) Exception

The May 13th Draft includes a new exception to some post-incident response procedures in the event that the event is “involuntary or unintentional type 2 workplace viole[nce] incidents that are repetitive ...” under certain conditions. We are concerned that the use of “involuntary” and “unintentional” in this context are difficult to apply and also are not needed here.

For context: in our Prior Letter and at the prior advisory committee meeting, we expressed concern that certain workplaces, such as bars, would by the nature of their setting be producing continuous workplace violence reports – even for things as mundane as vaguely angry yelling by somewhat inebriated patrons. Notably, special education teachers raised similar concerns during the prior advisory committee meeting.

We believe the exception is a good attempt to address these situations but believe that the limitation that such conduct be “involuntary or unintentional” seems to limit the application of the section beyond usefulness. A student’s momentary anger and violence are not “involuntary,” because they are not subconscious like a muscle spasm or a sneeze. On the contrary, violent actions are purposeful (though ill-considered) responses to a brief disappointment, such as the denial of a snack or the end of a favored activity. They are certainly not “unintentional” for the same reasons. Similarly in the context of a bar: the conduct of a local drunk who repeatedly makes the same vaguely threatening statements to a bouncer who won’t allow him to drink more is not “unintentional” or “involuntary.” However, in both cases, we would say that the need to repeat the post-incident obligations of subsection (c)(11)(D)-(G) is minimal at best,¹¹ particularly in light of the four limitations of the exception (prior compliance, no injury, no weapons, and logging).

To that end, we would suggest the following change:

EXCEPTION: Employers are exempt from subsections (c)(11)(D) through (G) for involuntary or unintentional type 2 workplace violent incidents that are repetitive if all of the following conditions apply: ...

¹⁰ For example – in a summer camp such as the one Mr. Moutrie worked at when he was in his early 20’s, there were only 12 employees – and only 6 people on duty for most days. There was only one Camp Director, and any issues needed to go to them, as all other employees were on equal footing as counselors. In such a situation, it would be impossible to avoid reporting to a supervisor who might be involved, because there was literally no one else who could receive such reports.

¹¹ These obligations are not inconsequential. They include: (1) a post-incident debriefing after the incident with employees, supervisors, and other persons; (2) evaluation for workplace hazards that may have contributed; (3) reviewing prior corrective measures to determine if they were effectively implemented or if additional measures are needed; and (4) soliciting employee observations of the incident and its potential causes.

i. **Recordkeeping Production – (f)(6) Exception**

We request a clarification that only the Division can request the production of personal identifying information, as noted below:

All records required by ~~this subdivision~~ subsection (f) shall be made available to the Division upon request for examination and copying. **Personal identifying information shall be made available to the Division upon request by the Division.**

Conclusion:

We appreciate the opportunity to provide comment and look forward to participating in the advisory committee process on this important regulation.

Sincerely,



Robert Moutrie
Senior Policy Advocate
California Chamber of Commerce
on behalf of

Associated General Contractors of California, Tresten T. Keys
California Alliance of Family-Owned Businesses, Bret Gladfely
California Association of Sheet Metal and Air Conditioning Contractors National Association, Emily Mills
California Association of Winegrape Growers, Michael Miller
California Attractions and Parks Association, Sabrina Demayo Lockhart
California Chamber of Commerce, Robert Moutrie
California Citrus Mutual, Casey D. Creamer
California Construction and Industrial Materials Association (CALCIMA), Charley Rea
California Cotton Ginners and Growers Association, Roger Isom
California Farm Bureau, Bryan Little
California Farm Labor Contractor Association, Kimberly E. Clark
California Framing Contractors Association, Kevin Bland
California Fresh Fruit Association, Daniel Hartwig
California League of Food Producers, Benjamin Ebbink
California Restaurant Association, Matt Sutton
California Retailers Association, Ryan Allain
California Tomato Growers Association, Mike Montra
California Trucking Association, Nick Chiappe
California Walnut Commission, Robert Verloop
Construction Employers' Association, Scott Govenar
Dairy Institute, Katie Davey
Northern California Allied Trades (NCAT), Michael Donlon
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