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September 29, 2026

Research, Standards, and Technical Services (RSTS) Branch
Cal/OSHA Headquarters
1515 Clay Street, Suite 1901
Oakland, CA 94612
By email: RS@dir.ca.gov

RE: Draft Standard for Comment- Prohibition of Fabrication and Manufacture of Artificial Stone with more than 1.0% Crystalline Silica

Dear Members of the Research and Standards Branch:

The Los Angeles County Department of Public Health (Public Health) respectfully writes in strong support of the development and adoption of section 5204.1 and proposed changes to sections 5204 and 1532.3, strict prohibition on crystalline silica activities. The emergence of silicosis among skilled workers that cut, fabricate, and install artificial stone slabs in Los Angeles County has increasingly devastated workers, their families, and entire communities over the last few years, with workers diagnosed on a weekly basis in Los Angeles County. Silicosis is an entirely preventable occupational disease with no place in modern American society, and results in a costly burden of care on society and substantial human suffering.

As of September 24, 2026, the California Department of Public Health's Occupational Health Branch reports 341 silicosis cases in Los Angeles County alone, accounting for 52% of the state's known silicosis cases. Public Health, along with occupational medicine physicians, industrial hygienists, labor, and other subject matter experts view the proposed amendments as a pivotal tool to help mitigate future exposure to respirable crystalline silica (RCS), and over time, reduce the number of artificial stone related silicosis cases across the County and the state.

Los Angeles County is unique in that our Public Health staff has been highly engaged with addressing the silicosis epidemic among stone fabricators since 2023. Public Health has developed an interactive outreach and education initiative, in partnership with community-based organizations, that includes providing education and resources to workers, employers, and the community. Public Health staff continue regular and ongoing outreach visits to fabrication shops throughout the county. Despite new Cal/OSHA regulations beginning in December 2024, many smaller and mid-size shops remain significantly under-resourced and unable to fully implement the enhanced regulations. We have observed some shops doing dry cutting as recently as this summer.

The amended silica standards are an important step in protecting fabrication workers and will require comprehensive outreach, education, and enforcement efforts to ensure strong and effective implementation. Public Health is eager to partner with the State to support ongoing efforts to educate workers and connect those who are sick with health care services.

Thank you for your consideration of these amendments and for your efforts to keep workers safe.

Sincerely,



Barbara Ferrer, Ph.D., M.P.H., M.Ed.
Director, Los Angeles County, Department of Public Health

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