

**From:** Forrest Wilson <dforrestwilson@gmail.com>  
**Sent:** Tuesday, September 29, 2026 2:48 PM  
**To:** DIR RS  
**Subject:** Comments on Draft Standard – Prohibition of Fabrication and Manufacture of Artificial Stone with more than 1.0% Crystalline Silica (Proposed Section 5204.1)

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To the Research and Standards Branch:

My name is Forrest Wilson. I am president of Tops Countertops, a countertop fabrication company in Lacey, Washington. We fabricate and install granite, quartz, quartzite, marble, porcelain, and other surfaces for homes across the South Puget Sound. I write as an industry stakeholder, because California's approach to engineered stone will shape policy across the West.

I want to be direct: silicosis is a terrible disease, and protecting fabrication workers is a goal I fully support. But an outright prohibition on engineered stone fabrication will not end silica exposure — it will end law-abiding shops. Responsible fabricators who invest in engineering controls, wet cutting, ventilation, and respiratory protection are the ones who will comply and close. Work will shift to less-regulated settings, and the workers most at risk will remain at risk.

I respectfully urge the Division to consider the shop-licensing alternative proposed by the International Surface Fabricators Association (ISFA) instead of an outright ban: license fabrication shops, require verifiable dust-control and safety standards, mandate worker training and medical surveillance, and enforce against noncompliant operators. That protects workers while preserving legitimate businesses and jobs.

I also ask that any final rule provide a realistic phase-in. A 60-day window to stop fabrication is not workable for shops holding inventory and customer contracts; a longer, clearly defined transition protects both workers and the businesses that employ them.

Thank you for considering these comments and for the opportunity to participate.

Forrest Wilson  
President, Tops Countertops  
Lacey, WA