AMERICAN SOCIETY
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November 2, 2015

Dave Thomas, Chairman
Occupational Safety and Health Standards Board
2520 Venture Oaks Way, Suite 350
Sacramento, CA 95833

RE: Addressing California's Residential Fall Protection Requirements

Dear Mr. Thomas and Board

Consistent with the American Society of Safety Engineers' (ASSE) support for the Occupational Safety and Health Administration's (OSHA) change in policy to require fall protection for all construction workers, the members of the eleven California Chapters of ASSE urge Cal-OSHA to adopt a 6-feet fall protection standard for residential construction.

Falls are and have been the number one cause of death for construction workers. According to the "Safety & Health Fact Sheet Fall Protection in Construction" falls are one of the most common reasons for workplace injuries and fatalities in California. The California Code of Regulations require fall protection at 6 feet, 7-1/2 feet, 15 feet and 20 feet. Six feet would provide consistency for employers and provide safety for workers in this high hazard industry.

In addition, the Annual High Hazard Industry List consistently includes framers, roofers and structural steel industries. Each of these industries requires fall protection well above the 6-foot level. This High Hazard List is comprised of industries with a DART rate greater than 200% of a prior

year's private sector DART rate. The 2015-2016 High Hazard Industry List shows framers have an average DART rate of 4.5 compared to private industry average of 2.1 in 2013. CCR 1716.1 and 1716.2 require fall protection above 15 feet for framing operations.

Section 18 of the Occupational Safety and Health Act requires state regulations to be at least as effective as OSHA. The current fall protection requirements for workers in residential construction in California do not meet this standard. We urge Cal-OSHA to voluntarily conform to this act.

Thank you for listening to our members' concern. As always, ASSE and its members in California are ready to work with you to help ensure that workers in California receive the protections they deserve.

Respectfully,

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ASSE California Chapters
- Bakersfield Chapter
- Central Valley Chapter
- Greater San Jose Chapter
- Long Beach Chapter
- Los Angeles Chapter
- Orange County Chapter
- Sacramento Chapter
- San Diego Chapter
- San Francisco Chapter
- Valley Coastal Chapter