

**OCCUPATIONAL SAFETY  
AND HEALTH STANDARDS BOARD**

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**FINAL STATEMENT OF REASONS**

## CALIFORNIA CODE OF REGULATIONS

TITLE 8: Sections 5620, 6165, 6180, 6181, 6182, 6183, and 6184  
of the General Industry Safety Orders

Update of Title 8 General Industry National Fire Protection Association (NFPA)  
Fire Protection Standards

**MODIFICATIONS AND RESPONSE TO COMMENTS RESULTING FROM THE  
45-DAY PUBLIC COMMENT PERIOD**

There are no modifications to the information contained in the Initial Statement of Reasons.

**SUMMARY OF AND RESPONSES TO WRITTEN AND ORAL COMMENTS:****I. Written Comments**

**Mr. David Shiraishi, Area Director, Region IX, OSHA, U.S. Department of Labor,  
by letter dated May 14, 2014.**

**Comment:**

Mr. Shiraishi commented that Federal OSHA has reviewed the proposal and found it to be commensurate with federal standards.

**Response:**

The Board thanks Mr. Shiraishi for his comments and participation in the Board's rulemaking process.

**II. Oral Comments**

Oral comments received at the August 21, 2014, Public Hearing in Sacramento, California.

**Elizabeth Treanor, Phylmar Regulatory Roundtable**, stated that her organization supports the proposal, and she thanked the Board staff for their assistance.

**Response:**

The Board thanks Ms. Treanor for her comments and participation in the Board's rulemaking process.

**ADDITIONAL DOCUMENTS RELIED UPON**

None.

**ADDITIONAL DOCUMENTS INCORPORATED BY REFERENCE**

None.

**DETERMINATION OF MANDATE**

These regulations do not impose a mandate on local agencies or school districts as indicated in the Initial Statement of Reasons.

**ALTERNATIVES CONSIDERED**

The Board invited interested persons to present statements or arguments with respect to alternatives to the proposed regulation. No alternative considered by the Board would be (1) more effective in carrying out the purpose for which the action is proposed; or (2) would be as effective as and less burdensome to affected private persons than the adopted action, or (3) would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. Board staff were unable to come up with any alternatives or no alternatives were proposed by the public that would have the same desired regulatory effect.