

Memorandum

To : ALL STANDARDS BOARD MEMBERS

Date : March 14, 2017

From : **Occupational Safety and Health Standards Board**
Mark Kaphle, MS, CSP, Senior Engineer, Board Staff

Subject: **Use of Hook-On and Attachable Ladders with Scaffolds and Rest Platforms (HORCHER)**

At the February 16, 2017 Public Hearing, the Occupational Safety and Standards Board considered revisions to California Code of Regulations, Title 8, General Industry Safety Orders, Section 1637, General Requirements. These standards are substantially the same as federal standards.

Labor Code Section 142.3(a)(3) exempts the Board from providing a comment period when adopting a standard substantially the same as a federal standard. However, as indicated in the Notice (Informative Digest), the Board still provided a comment period for the purpose of identifying only issues related to the following three areas: 1) any clear and compelling reasons for California to deviate from the federal standards; 2) any issues unique to California related to this proposal which should be addressed in this rulemaking and/or subsequent rulemaking.

As a result of public comments, there were no changes made to the original proposal.

SUMMARY OF WRITTEN AND ORAL COMMENTS

I. Written Comments:

Amber Rose, CIH, Area Director, Occupational Safety and Health Administration, Oakland Area Office, by letter dated January 10, 2017.

Comment:

Ms. Rose mentions in the letter that the proposed occupational safety and health standard appears to be commensurate with the federal standard.

Response:

The Board thanks Ms. Rose for her comment and participation in Board's rulemaking process.

II. Oral Comments at the February 16, 2017, Public Hearing:

No oral comments were received.

DETERMINATION OF MANDATE

These regulations do not impose a mandate on local agencies or school districts.