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**OCCUPATIONAL SAFETY AND HEALTH
STANDARDS BOARD**

Sundt Construction
41 Corporate Park, Ste 310,
Irvine, CA 92606
May 8, 2020

Occupational Safety and Health Standards Board
2520 Venture Oaks Way, Suite 350,
Sacramento, California 95833

OSHB:

Cal/OSHA's 1711 says that "reinforcing steel shall not be used as a guy or brace." However, the standard is not clear on whether this rule applies to *internal or external* guying/bracing.

Engineers have designed structural elements to safely self-support via internal bracing. Additionally, internal bracing eliminates the need to adjust or remove external braces which poses a serious risk to workers.

Since it is possible to safely use rebar for internal bracing, I ask that the Standards Board consider updating 1711 to allow for internal bracing with rebar as long as it is designed by a qualified person.

Sincerely,

Marisa "Reese" Fortin, CSP, ASP, CHST, STSC
Area HS&E Manager