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October 30, 2026

Cal/OSHA Research and Standards Branch
Attn: Emergency Silica Rulemaking, Petition 609
1515 Clay Street, Suite 1901
Oakland, CA 94612

RE: Comments on the October 22, 2026 Updated Draft Standard—Proposed Emergency Silica Regulation, Title 8, sections 5204, 5204.1, and 1532.3

Dear Research and Standards Branch Staff:

The Health Officers Association of California (HOAC), which represents the physician health officers in California's sixty-one city and county jurisdictions, appreciates the opportunity to provide additional comments on the updated discussion draft of the proposed silica regulations. HOAC continues to strongly support the proposed prohibition on the manufacture and fabrication of artificial stone containing more than 1.0 percent crystalline silica. That said, as noted in our September 25 comment letter, HOAC has several recommendations that are important to ensuring the regulation provides effective and consistent worker protections.

HOAC would like to reiterate its recommendation that Cal/OSHA require the immediate cessation of prohibited activities through mandatory Orders Prohibiting Use when a violation is identified. Given that the proposed regulation expressly establishes these activities as an imminent hazard, issuance of an Order Prohibiting Use should not be left to enforcement discretion. A mandatory cessation requirement is necessary to ensure prohibited activities do not continue and workers are not subjected to further exposure.

Additionally, HOAC emphasizes the importance of providing adequate staffing and resources to support effective implementation and enforcement of the regulations. Sufficient enforcement capacity is essential to identifying violations promptly, ensuring consistent compliance across affected workplaces, and preventing further occupational silica exposure and disease.

Silicosis is a serious, incurable, and preventable occupational disease that continues to affect California workers, including young individuals who may experience premature disability and death. HOAC appreciates Cal/OSHA's continued efforts to address this significant worker health concern and urges the Division to incorporate these outstanding recommendations into the updated proposal.

Thank you for your consideration.

Sincerely,

Isabella Argueta

Isabella Argueta
Director of Legislation
Health Officers Association of California

Health Officers Association of California
P.O. Box 160634, Sacramento, CA , 95816
Phone: (916) 441-7405
yourhoac.org