

From: RULEMAKING Osha * DCBS
Subject: Adjustments to COVID-19 Workplace Requirements for Employer-Provided Labor Housing

EXHIBIT

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From: Diana Tesh <vlahakistesh@gmail.com>
Sent: Thursday, June 30, 2022 7:01 PM
To: RULEMAKING Osha * DCBS <OSHA.rulemaking@dcbs.oregon.gov>
Subject: Adjustments to COVID-19 Workplace Requirements for Employer-Provided Labor Housing

I am opposed to repealing most of COVID-19 Workplace Requirements for Employer-Provided Labor Housing for the following reasons.

The justification given for amending the rule is because it conflicts with OHA recommendations. This is not a good reason: OHA and OR-OSHA have different missions and responsibilities. Oregon OSHA is responsible for developing rules that ensure a safe and healthy workplace for Oregonians and OAR 437-004-1115 does that. We are still experiencing a pandemic and employees still deserve to be protected from acquiring a potentially life-threatening infectious disease at work. Be bold, OR-OSHA: the agency can and should be more stringent than OHA.

Repealing most of the rule disproportionately impacts people of color and immigrants, directly conflicting with the State's attempts to promote racial equity.

Employees who sleep in bunk beds, beds closer than 6 feet apart, or live in spaces providing less than 40 square feet per occupant are living in objectively horrible conditions. The COVID provisions make their living conditions marginally less awful. OR-OSHA should take advantage of the opportunity provided by the pandemic to provide slightly improved living conditions for some of the state's most under-privileged workers.

Spacing beds out a bit, providing improved ventilation, and requiring daily cleaning are engineering controls that reduce the risk of infectious disease, including COVID, tuberculosis, influenza and other airborne diseases. PPE is the least effective in the hierarchy of controls and also the most burdensome to workers, which is why I support revoking the masking requirement.

The pandemic is still ongoing and workers deserve protection. Even absent COVID, the requirements for slightly improved housing conditions are just humane practices, providing low-wage workers some dignity. The only beneficiaries of revoking these protections are the most greedy employers who disregard their employees' safety, dignity and comfort.

I strongly object to repealing these requirements and returning to truly awful living conditions for the State's lowest-paid essential workers. Please show these workers some respect and human kindness.

Diana Tesh, MPH, CIH

Portland, Oregon