



April 27, 2023

Carmyn Shute, Administrative Regulations Analyst
Department of Labor & Industries
Division of Occupational Safety and Health
PO Box 44620
Olympia WA 98504-4620

Dear Ms. Shute,

On behalf of farmers in the northwest corner of Washington, we are concerned about the direction of the Ambient Heat Exposure permanent rulemaking. As you know, labor within every industry is different and this is very true for agriculture. Agriculture requires working outside during all seasons. In western Washington, we traditionally experience a more mild, ocean climate compared to our friends on the east side of the Cascades, but we also have months that would be affected by your proposed rules. Much of the labor during harvest and irrigation seasons is during the heat of the summer, and our employees understand that this is necessary. We farm differently here, and a one-size-fits-all approach to ambient heat exposure is NOT appropriate in Washington.

We also believe the Department of Labor & Industries has not sufficiently demonstrated the need for additional rules beyond what has already been implemented. The new proposed "trigger temperatures" are arbitrary and unnecessarily low, and we are very concerned that required "cool down" periods are also arbitrary with no limits. Most farms already take extraordinary measures to ensure that their employees are safe and well-hydrated during the heat of the day. We encourage you to meet with farm groups around the state to revise your proposed rules and develop solutions at the local level.

Sincerely,

Jenn Smith, President
Western Washington Agriculture Association
Mount Vernon, WA
info@westag.org