

July 17, 2018

Mr. Tim Kerr, General Manager
American River Flood Control District
185 Commerce Circle
Sacramento, California 95815-4201

RE: LIABILITY, PROPERTY, AND WORKERS' COMPENSATION RISK ASSESSMENT

Dear Mr. Kerr:

It was a pleasure meeting with you and your staff on July 3, 2018. The purpose was to obtain an update on District operations, review loss histories, and assess any risk exposures. Please thank Malane Chapman, Office Manager, and Ross Kawamura, Field Supervisor, for their time and consideration during my visit.

We discussed the District's loss histories and associated Experience Modification (X-mod) rates. In the current Liability Program coverage year, the District's X-mod remained at a favorable 0.89, and the District's workers' compensation X-mod decreased to 0.92. The District has not had a property loss since the 2005/06 policy year. I commend the District for its continuing efforts in its loss control and safety efforts. I will continue to advise the District on C2E "best practices" that may assist in the reduction of losses.

As we move into summer, precautions should be taken to protect ourselves against heat illness. It's also a good time to conduct heat illness training to staff on the environmental and personal risk factors for heat illness, your District's heat illness prevention procedures, the importance of frequent consumption of small quantities of water, acclimatization, and the types and symptoms of heat exposure. You can utilize our [Heat Illness Prevention template](#) that includes a lone worker standard operating procedure to customize an ARFCD specific heat illness program.

Last fall Ross and I talked about staff's occupational exposure to unsanitary conditions when doing maintenance or repair on the levees. Many of these biohazard wastes are associated with unsheltered homeless, transients, or homeless encampments. While Sacramento County is the lead agency in handling homeless encampment relocation and clean-up, the District is responsible for maintaining a safe and secure work area(s) for staff within their operational area.

I applaud ARFCD for implementing a bloodborne pathogens program that includes training and thorough exposure determinations offering staff Hepatitis A and B vaccines. These are fundamental risk control efforts to minimize employees' occupational exposure to blood or other potentially infectious materials (OPIM). I searched the department of public health website to learn of best practices for working in and around these unsanitary conditions, but could not

locate any resource materials. The next best reference I found was a [code of safe operating procedures by Caltrans](#). In this document you may find useful information with operating procedures for working around urine, biological waste, and hypodermic needles. I encourage ARFCD to develop or revise any SOPs using this Caltrans resource.

During my visit last year, we discussed the proposed Silica standard, which is now enforceable by Cal/OSHA. We reviewed Cal/OSHA's respirable crystalline silica dust [Table 1](#). Ross needs more time to review Table 1 to determine District operations that could create silica dust exposures. Great Silica exposure control resources are available on the website of [Working Safely with Silica](#). The District can use the *Working Safely with Silica* website to create its Silica standard operating procedures (SOPs). OSHA factsheets are a great resource for developing SOPs and can be found [here](#). Ross expressed concerns about exposure control techniques for the District's colloidal mixing machine. I continue to work with him on finding appropriate exposure control methods for this equipment and operational task.

A few months ago, the JPIA had a question on the respiratory protection nomination submitted to our H.R. LaBounty Safety Awards Program. This nomination was rolled over to the fall so I could review ARFCD's written respiratory protection program (RPP). You provided me with the written plan and I observed the following:

- Employees currently using a filtering face piece respirator are trained in the District's RPP with an acknowledgement page on file.
- An appropriate medical clinic or service provider conducts employee medical evaluations via the questionnaire.
- Employees receive a copy of [8 CCR 5144 Appendix D](#).
- Affected employees receive annual respiratory protection training.

A successful respiratory protection program must be regularly evaluated to ensure that it is up-to-date and effective. The frequency in which an employer evaluates its respirator program will depend on the complexity and the extent of respiratory hazards in your workplace.

The JPIA's H.R. LaBounty Safety Awards Program has been revised to refocus the program's emphasis on nominations promoting results-oriented activities. The District is encouraged to [download](#) and review the revised Safety Award Program Description and Nomination Form.

Ross shared that community members on recreation trails of the levees are increasingly coming in too close contact with ARFCD equipment and tasks. Currently, heavy equipment owned by the District has numerous warning and alert devices such as high-intensity rotating, flashing, oscillating, or strobe lights, signs, or special lighting. Despite these warnings and alerts, devices joint use participants encroach within the District's work zone; I have two suggestions for ARFCD consideration. First, review the California Manual of Uniform Traffic Control Devices (CA-MUTCD), and assess if there are additional temporary traffic control provisions the District can implement. The section on [mobile work duration](#) should be reviewed closely. In some events a spotter or flagger may be a best practice to deter a community member from entering your work area.

Public outreach promoting ARFCD work zone safety and/or maintenance activities and recreation use conditions, promotes responsible behavior to users. Educational efforts can include the District's website, brochures, partnership with other local agencies, and recreation groups. Click [here](#) for a public notification by a town cautioning trail users to maintenance work. Another notification tool is community messages or signs indicating content such as "MAINTENANCE CREW CURRENTLY WORKING ON RECREATION TRAIL. USE CAUTION."

Lights and warnings are "best practices" in the JPIA's Commitment to Excellence (C2E) *Construction* loss reduction menu to reduce third party exposures. Traffic control activities per the CA-MUTCD are also best practices in our C2E *Construction* focus.

We toured the District's main facilities including the shop areas. I appreciate the new emergency eyewash and shower unit, drill press, belt, and disc sander. I also observed additional cooling equipment located in the rear of the shop. The new oscillating fan and evaporative air cooler are excellent additions, as California is moving towards an indoor heat illness prevention standard.

In October 2016, Governor Brown signed and approved Senate Bill 1167, which went into effect on January 1, 2017. The law directs Cal/OSHA to draft and propose heat illness and injury prevention standards for indoor workplaces by January 1, 2019. California has an active outdoor workplace heat illness standard since 2006. You can view Cal/OSHA's advisory meeting draft standards on *Heat Illness Prevention in Indoor Places of Employment* [here](#).



I will return to your District later this summer to conduct a Silica Training class. Next year's risk assessment visit will be to various levee maintenance locations, observing any potential joint use conflict with recreation users and maintenance work.

In the meantime, should you have any questions or need assistance, please contact me at (800) 231.5742, Ext. 3137, or via email at rflint@acwajpia.com.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Robin Flint', is shown above the typed name.

Robin Flint, ARM, CSP, CEAS I
Senior Risk Management Advisor

717:tl

c: Ross Kawamura, Field Supervisor
William Pavao, JPIA Board Member

City of
SACRAMENTO

COMMUNITY DEVELOPMENT
DEPARTMENT

300 Richards Blvd. 3rd Floor
Sacramento, CA 95811

275-0300-009-0000
AMERICAN RIVER FLOOD CONTROL DISTRICT
165 COMMERCE CIR
SACRAMENTO, CA 95815

Public Notice/Ethan Meltzer/Z17-253



300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Help Line: 916-264-5011
CityofSacramento.org/CDD

NOTICE OF PUBLIC HEARING

July 30, 2018

The Community Development Department is notifying all owners of property within 300 feet of the proposed project (described below) that the Sacramento City Director Hearing will consider this proposal at a Public Hearing scheduled to begin at 1:00PM AT 300 RICHARDS BLVD, 3RD FLOOR, SACRAMENTO, CA 95811 ON AUGUST 9, 2018.

Z17-253 **TITLE:** **241 Lathrop Way Cannabis CUP**

LOCATION: 241 Lathrop Way

 275-0300-023-0000

 District - 3

PROJECT: A request for a Conditional Use Permit to allow cannabis production involving approximately 18,080 square feet of manufacturing and approximately 4,682 square feet of distribution within an existing 31,200 square foot building on a 2.53-acre parcel and minor Site Plan and Design Review for minor exterior improvements to the existing building in the Light Industrial (M-1-PC) zone.

ENVIRONMENTAL: Exempt per CEQA 15301-Existing Facilities

If you challenge the nature of the proposed action in court, you may be limited to raising only those issues you or someone else raised at the Public Hearing described in this notice or in written correspondence delivered to the Director Hearing at or prior to the Public Hearing.

If you have any concerns, questions or objections, or need further information, please contact Ethan Meltzer at the Community Development Department, 916-808-5879 or EMeltzer@cityofsacramento.org, and please refer to project number Z17-253.