October 31, 2022

Occupational Safety & Health Standards Board
2520 Venture Oaks Way, Suite 350
Sacramento, CA 95833

Submitted electronically: oshsb@dir.ca.gov

RE: COVID-19 Regulation 15-day Change Notice

Dear Chair Thomas and Esteemed Standards Board Members,

The California Chamber of Commerce and the undersigned coalition of both public and private employers/organizations submit this letter to provide comment regarding the 15-day change notice (the "Change Notice")[1] on the proposed non-emergency COVID-19 Standard (Section 3205 or "the Proposed Regulation"),[2] as well as respond to comments made at the October 20th Occupational Safety and Health Standards Board (the "Standards Board") meeting.

Comments on Proposed Changes in 15-day Change Notice

1. **Redefining "Close Contact" as anyone sharing a 400,000 cubic feet or smaller space**. As noted in prior coalition letters, the definition of a "close contact" has led to widespread confusion since the shift away from the traditional "six foot/fifteen minutes" rule. The Change Notice integrates the new California Department of Public Health (CDPH) definition based on the internal volume of a workplace, with workplaces larger than 400,000 cubic feet using the old six-foot standard, and those smaller using the June 2022 "same indoor airspace" standard.[3]

   We appreciate the attempt to respond to stakeholder concerns that the "same indoor airspace" standard had absurd application in larger workplaces, and was difficult to apply. While we believe the Change Notice helps some of California's very largest workplaces with a clear, feasible standard to determine close contacts, we have a number of outstanding concerns.

   First, the determinations surrounding the 400,000 cubic feet standard for a workplace are difficult for a number of reasons. Most employers do not know the cubic footage of their building, let alone individual rooms. Second, it appears an open or closed door may change the size of the space – by separating one potential space into two smaller spaces – which will make calculations around whether a workplace falls above or below the threshold difficult for California's businesses to determine. These feasibility issues will fall particularly hard on smaller employers, who do not have the resources to have a dedicated compliance team, and need a simple, clear standard to apply. In contrast – the original use of a simple proximity-based standard (such as six feet) was feasible and practicable for employers.

   Second, the selection of 400,000 cubic feet seems bizarrely calculated, given it is based on an 8-hour exposure estimate, but the regulation's provisions are triggered by a 15-minute exposure.

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[1] 15-day notice, dated October 14, 2022 available here: https://www.dir.ca.gov/oshsb/documents/COVID-19-Prevention-Non-Emergency-15-Day.pdf.
[2] The text of the proposed regulation, without the changes of the 15-day change notice, is available here: https://www.dir.ca.gov/oshsb/documents/COVID-19-Prevention-Non-Emergency-txtcourtesy.pdf
[3] This "indoor airspace" standard is contained in CDPH's June 8th Order (https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Order-of-the-State-Public-Health-Officer-Beyond-Blueprint.aspx), and reflected in Cal/OSHA's June 21st FAQ update (COVID-19 Emergency Temporary Standards Frequently Asked Questions (ca.gov))

Third, from an organizational perspective, we do not believe this new confusing standard should be enshrined in the regulatory text. Instead, we believe the regulatory text should maintain the traditional six foot/fifteen-minute standard, and CDPH's orders can supersede the text for their duration, with a return to the text when CDPH revokes their overriding orders.

2. **Change to Outbreak Exit Threshold**. The Change Notice includes an adjustment to the conditions under which an outbreak can end. (See Section 3205.1(a)(2)). Under the Change Notice, an outbreak could end even if one case arises in a two-week period in the exposed group – but outbreak precautions would need to continue if two cases arose.

   We believe this change is entirely appropriate and better reflects when an outbreak is actually occurring in a workplace. For context – an outbreak is triggered by three cases, and a major outbreak is triggered by 20 cases. (Section 3205.1 & 3205.2).[4] In light of these thresholds, the prior standard of remaining in outbreak protocols until zero cases occurred in a workplace for a 2-week period was always an outlier. The same one case that would not trigger an outbreak could, bizarrely, extend outbreak protocols for weeks.

   Functionally, this meant that large workplaces were often unable to end outbreak protocols because one worker who caught COVID-19 socially would extend expensive and disruptive outbreak protocols for weeks. This became increasingly true as state-wide opening meant cases were increasingly due to day-to-day social interactions, and vaccination greatly reduced the consequences (and symptoms) of COVID-19 cases. As a result, we believe this change strikes an appropriate balance and reflects the transition away from emergency-level precautions, while still protecting worker safety and maintaining outbreak protocols where necessary.

3. **Recordkeeping change**. We support the adjustment of the recordkeeping obligations in Change Section 3205(j). In light of the recent broadening of "close contacts" in June of 2022 to the "indoor airspace" definition, the breadth of close contacts to be identified under this provision would have been absurd. Moreover, contact tracing is no longer broadly recommended by the CDC as of February of 2022.[5] We particularly support this change as contact tracing made more sense in earlier stages of the pandemic, when identifying, isolating, and quarantining cases was the focus. However, as COVID-19 has become socially common (but less dangerous), the benefit to be gained from the onerous recordkeeping obligations contained in the Proposed Regulation was negligible.

4. **Ventilation.** We are concerned that the change to the ventilation requirements in Change Section 3205(h) appears to create a ***mandatory*** obligation for employers to act, regardless of the workplace's situation. This is in contrast with the prior language, which required analysis ***but not specific compliance measures*** regardless of workplace realities. For context: employers are currently required to "evaluate whether current ventilation is adequate" in the Proposed Regulation.[6] However, the Change Notice deletes this language, and instead provides that "[e]mployers ***shall*** develop, implement, and maintain effective methods to prevent transmission of COVID-19 ***including one or more of the following actions to improve ventilation…***" (Change Section 3205(h), emphasis added). The newly compulsory strategies are covered in 3205(h)(a):(1) [maximize ventilation], (2) [upgrade building air filtration to MERV-13], and (3) [use portable HEPA filters]. While we believe all three of these can be helpful strategies to improve ventilation in some workplaces and may reduce COVID-19 transmission risk (depending on the workplace) we do not

[4] Where it is necessary to refer to a section that is numbered differently in the Proposed Regulation and the Change Notice, "Change Section" will refer to the Change Notice's proposed text. "Section" will refer to the proposed Regulation's text.

[5] See "Prioritizing Case Investigation and Contact Tracing for COVID-19", available here: https://www.cdc.gov/coronavirus/2019-ncov/php/contact-tracing/contact-tracing-plan/prioritization.html#:~:text=Universal%20case%20investigation%20and%20contact,and%20groups%20at%20increased%20risk.

[6] This requirement is also more consistent with the broader approach supported by the CDC's ventilation guidance, which offers a myriad of strategies, but does not limit itself to the three identified in the Change Notice.

understand the shift away from the current language to the requirement to implement "one or more" of these. Moreover, we believe that, in certain workplaces, these strategies may add no benefit, making the shift from flexibility to compulsory usage baffling. Should this language be passed in December, we believe an FAQ clarifying that the intent of this change was not to compel usage of these three strategies over other suitable means would be urgently necessary.

5. **Exposed Group definition.** We support the adjustment to the definition of Exposed Group to allow persons to momentarily pass through a space unmasked without bringing that space into the Exposed Group. (Change Section 3205(b)(7)(A).) This change aligns with the general reliance on more than a fleeting proximity inherent in our long-standing usage of 15 minutes as a benchmark for identifying close contacts.

6. **Clarification of Hazard Analysis**. We support the adjustment to hazard analysis contained in Change Section 3205(c)(1), which clarifies that employers must consider all employees as potentially contagious *when determining measures to prevent transmission* in the workplace.

COVID-19 Exclusion Pay Discussion

During the October Standards Board meeting, there was extensive comment on the fact that the Proposed Regulation did not extend exclusion pay requirements – and that the Change Notice did not re-add exclusion pay into the Proposed Regulation.[7] There were also statements made with acknowledgements of limited legal knowledge regarding other related protections in California's labor law. The below comments seek to both answer some of the questions raised in this discussion, as well as provide context for why we support the decision by the Division to not extend exclusion pay into the non-emergency regulation.

Context: Changes from 2020 as we consider 2023 & 2024.

When the COVID-19 emergency regulation (Section 3205, 3205.1, &3205.2) was first passed in the Fall of 2020, California (and the world) looked very different. To name just a few differences – our state was in lockdown, schools were closed, and vaccine development for COVID-19 was still a matter of national news, not an available reality in California cities. At that point, the federal government, as well as California's elected representatives and state agencies were scrambling to develop and implement emergency precautions to blunt the rising curve of COVID cases.

As a result, a rush of both legislative and regulatory actions were taken to address the terrifying reality of a disease that we were truly unready to confront. Federally, FFCRA leave was passed in the Spring of 2020, but bizarrely only applied to employers with less than 500 employees. California's Legislature passed additional leave in August of 2020 to provide 80 hours of leave to workers at larger employers as well as healthcare workers and emergency responders.[8] The Legislature also passed SB 1159 (Hill) to create a presumption for Worker's Compensation that all COVID-19 cases in workplaces with an "outbreak" were workplace-related, and therefore covered by workers compensation. Cal/OSHA's rush to put out guidance, and then switch to an emergency regulation was part of this emergency process – and it was moved as quickly as possible (with an advisory committee promised after its passage) in order to get *something* into effect. We acknowledge that, in times of unprecedented challenges, rapid actions must be taken that may – in the minds of some – go too far or try new ideas.

However, that time of uncertainty and instability is now passed. Though COVID-19 certainly remains, we have vastly improved scientific understanding, including vaccination and improved therapeutics. California

[7] Notably, exclusion pay's removal from the Proposed Regulation is not a recent change. From its first public release of the draft non-emergency regulation was in September of 2021, and also in its formal 45-day comment period began in July of 2022, exclusion pay has not been included in the Proposed Regulation.
[8] AB 1867 (2020) is available here: https://leginfo.Legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB1867.

is fully open and COVID-19 is much better understood.[9] In other words: we are no longer in a perpetual state of emergency – and the Governor correctly acknowledged that we are exiting the emergency stage of the pandemic by announcing his intention to lift the state of emergency in February of 2023.

Substantive Clarifications and Information Regarding October Meeting Discussion.

1. Protections and Leaves Available to Workers Besides Exclusion Pay.

When considering whether exclusion pay is necessary, some knowledge of the labor law protections that exist outside of Cal/OSHA is important. California workers are provided leave under a web of both local, state, and federal law.

- **Workers Compensation** - As noted by Deputy Chief Berg on September 20th, workers compensation has previously been – and continues to be – available to workers who contract COVID-19 in the workplace. Importantly, this is exactly the population that were previously covered by exclusion pay – meaning there is no gap in coverage. Also notably, legislation has repeatedly provided a *presumption in favor of many workers when determining if their COVID-19 is workplace-related*.[10] This presumption presently remains in effect until Jan 1, 2024, and the Legislature may again extend it during the 2023 legislative year.

- **Paid Sick Leave -** Every employee in California is entitled to a minimum of 24 hours paid leave which can be used to recover from illness or injury or seek treatment and diagnosis.[11] Many cities have broader paid sick leave requirements through local ordinances, including Berkeley, Emeryville, Los Angeles, Oakland, San Diego, San Francisco, and Santa Monica. In addition, many employers offer more than 24 hours of paid leave.

- **State Disability –** an employee who is unable to work because of an infection or suspected infection with COVID-19 can file a Disability Insurance claim. Disability Insurance provides short-term benefit payments to eligible workers who have a full or partial loss of wages due to a non-work-related illness or injury.[12]

- **Twelve Weeks of Leave Under the California Family Rights Act**[13] **-** Workers are entitled to twelve weeks of "protected" leave under the California Family Rights Act ("CFRA"). Under CFRA, employers have no discretion to deny leave or ask employees to modify their leave to accommodate employers' business operations – and employees can take this leave to care for potentially sick family members as noted by legislators when discussing the legislation. In fact, legislators specifically noted that CFRA leave could be used for COVID-19 when expanding it in 2020.[14] Also, workers who take CFRA leave can receive wage replacement.[15]

[9] Notably, Deputy Chief of Health Eric Berg acknowledged the arc these changes in his comments to the Board on September 15, 2022. He noted that COVID-19 is now "widespread" in the population (making identification of true workplace cases difficult), but that vaccination has been "effective in reducing serious acute illness".
[10] *See* SB 1159 (Hill – 2020), and AB 1751 (Daly – 2022).
[11] CA Labor Code Section 246.
[12] *See* https://edd.ca.gov/en/about_edd/coronavirus-2019/faqs/disability-paid-family-leave/. ("Can I qualify for Disability Insurance benefits if I'm quarantined? Yes, if you are unable to work because you are infected or suspect you are infected with COVID-19, you can apply for Disability Insurance (DI)...")
[13] CFRA applies to all businesses with 5 or more employees.
[14] In support of SB 1383 (2020), Senator Jackson stated that the bill was "necessary to ensure California workers affected by the coronavirus can take time to care for themselves or a sick family member and keep their workplaces and communities healthy and safe." (Assem. Com. On Labor and Employment, Analysis of Senate Bill No. 1383 (2019-2020 Reg. Sess.), as amended June 29, 2020, p. 5.
[15] Wage replacement is available through State Disability Insurance or Paid Family Leave programs.

- **Twelve Weeks of Leave Under the Family and Medical Leave Act**[16] – the federal Family and Medical Leave Act (FMLA) also provides twelve weeks of leave, which is protected similar to CFRA leave.

- **California Fair Employment and Housing Act** – Sick leave may also be available to employees as a reasonable accommodation due to an employee's disability or medical condition. Leave is required as an accommodation if it appears likely that the employee will be able to return to work in the foreseeable future. 2 Cal. Code of Reg. § 11068, subd. (c).

2. Worker Job Protections While on Leave.

There were repeated comments from stakeholders (and some unanswered Board Member questions) regarding job protections for workers who are excluded from the workplace and on leave due to COVID-19.

As an initial matter, under the Proposed Regulation (even without exclusion pay), the status of being excluded by the employer functionally creates job protected leave.[17] As a result, we do not believe that any additional other authority is necessary to protect workers jobs while excluded.

Moreover, the above-identified leaves also guarantee that an employee *cannot be disciplined related to taking protected leave*. The California Family Rights Act, Fair Employment and Housing Act and California Labor Code all *prohibit retaliation against an employee for taking protected leave/time off*. Further, Labor Code section specifically 6310 broadly prohibits discharge or discrimination against an employee who exercises any rights under the California Occupational Safety and Health Act. In addition, Labor Code section 6409.6 prohibits retaliation against a worker for "disclosing a positive COVID-19 test or diagnosis or order to quarantine or isolate."

Again – this is *basic* tenant of labor law that is already in effect – and means that employers cannot discipline employees for taking leave from the office due to COVID-19, *regardless of whether exclusion pay is included in the Proposed Regulation*.

3. Unprecedented Nature of COVID-19 Exclusion Pay and Scope of Cal/OSHA.

There were multiple questions regarding why exclusion pay should be included in the COVID-19 regulation if it is utilized in other regulations like the Lead[18] and the Aerosol Transmissible Disease standard (ATD).

Here, some context for those regulations is important. For the ATD standard and the toxin-based regulations, they are focused on exposures that are unambiguously *workplace-related exposures*. The ATD standard focuses specifically on those whose workplace roles *directly involve caring for those with aerosol transmissible diseases.* For example: doctors and nurses are covered – but dentists are not. The reasoning behind this separation was that, though dentists (and many other professions) may have some incidental exposure to individuals who happen to be sick, *confronting diseases is not their workplace purpose*. In other words – though they may be at risk as a member of the public, their job-responsibilities are not specific to the hazard of aerosol transmissible diseases. Similarly, blood lead testing under the lead regulation is specific to individuals whose *work with lead* as part of their duties – therefore their exclusion to allow recovery is clearly tied to a work-related hazard. In other words: in the above situations, the employer *has control of the hazard, because it is a part of the workplace*.

[16] FMLA applies to all businesses with 50 or more employees.
[17] *See Barton v. New United Motor Manufacturing, Inc.*, 43 Cal. App. 4th 1200, 1205 ("It is settled that an employer's discharge of an employee in violation of a fundamental public policy embodied in a constitutional or statutory provision gives rise to a tort action.").
[18] California's lead regulation (8 CCR 1532.1/5198) is provided as an example of regulations surrounding exposure to workplace toxins, but it is not the only such regulation. Benzene (8 CCR 5218) is another example.

COVID-19, like any disease, may be present where people are present … but is *not a workplace-caused hazard*. Therefore, though keeping COVID in mind with safety precautions may be appropriate via the protections of the Proposed Standard and Change Notice, requiring exclusion pay on a state-wide basis for two years is a striking departure from Cal/OSHA's traditional scope – particularly as we leave the state of emergency for COVID-19 and move into non-emergency precautions.

Moreover, the scope of industries covered by the Proposed Regulation is massively different from the ATD and toxin-related regulations. Where those regulations apply to mostly larger employers, or in relatively specific industries, the COVID-19 regulation applies to virtually every workplace in the state. This contrast is important when considering the feasibility of compliance for the regulated employers. For the ATD standard (with covered employers consisting mainly of healthcare facilities), their expertise and resources are more equal to the ATD standard's relatively onerous requirements.[19]

In contrast, the COVID-19 regulation's obligations are state-wide, and the obligation of exclusion pay is by no means as feasible for smaller employers across California. Notably, we appreciate that Board Chair Thomas acknowledged the cost of this ongoing obligation at the September Board Meeting when discussing his support for exclusion pay – and even suggested that potentially state funds would be appropriate to help with this cost.[20] However, at this point, we remain unaware of any state funds made available or even discussed to assist with this 2-year extension of costs for a non-workplace-specific disease.

4. SRIA Issues with Potential Re-introduction of Exclusion Pay.

Notably absent from the September meeting discussion was mention of perhaps the most serious procedural hurdle to making a substantial change to the Proposed Regulation (such as re-adding exclusion pay): it would make a December vote impossible. The Standardized Regulatory Impact Assessment ("SRIA") process requires that state agencies promulgating a major regulation must "submit its completed SRIA" to the Department of Finance "not less than *60 days prior to filing a notice of proposed action with OAL*…"[21]

Here, the present SRIA draft – which analyzed the Draft Regulation without exclusion pay – would need considerable revisions to "consider all costs and all benefits" of the inclusion of exclusion pay, and alternatives to such an action. Given that, as of the date of this letter, only approximately *45 days* remain until the Standards Board's December meeting – it is literally impossible to: (1) prepare an altered draft text and put out a 15-day change order to alter the draft; (2) make the related substantive revisions to SRIA; (3) submit to the Department of Finance 60 days prior to the December vote.

Assuming the emergency regulation expires without extension in December – then presumably a new rulemaking process would be required to pass a COVID-19 non-emergency regulation. This new rulemaking process would be subject to traditional regulatory timelines. In other words – this change would appear to effectively end the Board's ability to have a seamless transition from the emergency regulation into the non-emergency COVID-19 regulation, and might delay adoption by *years*.

5. Legislature's Primacy Regarding Sick Leave & Ability to Respond.

Some discussion was also had regarding the Legislature's ability to respond to changes in COVID-19 or to a future spike in the next two years (when the Proposed Regulation would, potentially, be in effect).

[19] Notably, that equality for the covered parties and obligations is reflected in the fact that it was a carefully negotiated consensus regulation.

[20] Specifically, Chair Thomas commented, regarding exclusion pay: "… I don't know exactly how we do this. I don't know if it is going to come from the Senate or the Assembly. But there has to be some way to do this that the state funds partially or all. …"

[21] SRIA analysis is required by Government Code 11346.36, and the precise requirements for compliance are provided in 1 CCR 2000 *et seq*.

Looking backward, the Legislature has traditionally been in charge of creating sick leave – with the Labor Commissioner enforcing leave-related issues.[22]

Throughout the pandemic, the legislature has shown that it remains very capable of creating sick leave – and doing so much more quickly than a Cal/OSHA regulation can be adjusted. As recently as February 7, 2022 (barely one month into the 2022 legislative session), the California Legislature passed SB 114,[23] reviving and extending COVID sick leave – and made it apply retroactively.[24] In fact, approximately one month ago, on September 29, 2022, the Governor signed another budget bill, AB 152, which *again* extended the sunset date on SB 114's sick leave from September 30 to December 31, 2022. In other words: if additional COVID-19 sick leave is necessary in the coming years due to an unexpected variant or spike, the Legislature has the power to react quickly and has shown its willingness to do so.

With this history in mind, we believe that creating state-wide sick leave across all industries for a non-workplace-specific disease (such as COVID-19) is the proper prerogative of the Legislature – not Cal/OSHA. Though we understand the extreme circumstances that led to such exclusion pay as an emergency measure[25] when the pandemic was in its most dangerous phase, we do not believe it is proper for Cal/OSHA to exceed its scope in this way on a non-emergency basis.

Conclusion

Thank you for your work on this difficult and complicated issue – and for the opportunity to comment on the Change Notice.

Sincerely.

Robert Moutrie
Policy Advocate
California Chamber of Commerce
on behalf of

Acclamation Insurance Management Services
Advanced Medical Technology Association
Agricultural Council of California
Allied Managed Care
American Composites Manufacturers Association
Anaheim Chamber of Commerce
Associated Builders and Contractors of California
Associated General Contractors of California
Associated General Contractors – San Diego Chapter
Associated Roofing Contractors of the Bay Area Counties
Association of California Healthcare Districts
Auto Care Association
BizFed Los Angeles County Business Federation
Brea Chamber of Commerce
California Apartment Association
California Assisted Living Association
California Association of Health Facilities
California Association of Joint Powers Authorities

[22] A quick glance at the Labor Commissioner's Office website shows a plethora of resources and information about sick leave policies. For example, see "California Paid Sick Leave" at https://www.dir.ca.gov/dlse/paid_sick_leave.htm.
[23] The legislation was SB 114 (2022), and was codified in Labor Code Section 248.6. Available here: https://leginfo.Legislature.ca.gov/faces/billCompareClient.xhtml?bill_id=202120220SB114&showamends=false.
[24] "Retroactively" means, in this context, that employees who had taken sick time between January 1, 2022 and the legislation's passage were entitled to pay for any time they might have taken off, and were entitled to have whatever leave they had used re-added to their pool
[25] To be clear – many signatories opposed exclusion pay at that time – both as outside of Cal/OSHA's scope and as duplicative of sick leave. However, regardless of our views then, we understand that in rush of the early pandemic, emergency measures may have been understandable which – in the present non-emergency moment – are no longer appropriate.

California Association of Sheet Metal and Air Conditioning Contractors, National Association
California Association of Winegrape Growers
California Attractions and Parks Association
California Bankers Association
California Beer and Beverage Distributors
California Builders Alliance
California Building Industry Association
California Business & Industrial Alliance
California Business Properties Association
California Chamber of Commerce
California Cotton Ginners and Growers Association
California Craft Brewers Association
California Credit Union League
California Farm Bureau
California Framing Contractors Association
California Grocers Association
California Hotel & Lodging Association
California League of Food Producers
California Life Sciences
California Manufacturers and Technology Association
California New Car Dealers Association
California Restaurant Association
California Retailers Association
California Self Storage Association
California Special Districts Association
California Travel Association
California Trucking Association
Carlsbad Chamber of Commerce
CAWA - Representing the Automotive Parts Industry
Citrus Height Chamber of Commerce
Coalition of Small and Disabled Veteran Businesses
Construction Employers Association
Corona Chamber of Commerce
Costa Mesa Chamber of Commerce
Costa Mesa Chamber of Commerce
Dairy Institute of California
Dana Point Chamber of Commerce
Family Business Association of California
Family Winemakers of California
Flasher Barricade Association
Fresno Chamber of Commerce
Garden Grove Chamber of Commerce
Glendora Chamber of Commerce
Greater San Fernando Valley Chamber of Commerce
Grower-Shipper Association of Central California
Harbor Association of Industry & Commerce
Housing Contractors of California
Imperial Valley Regional Chamber of Commerce
Laguna Niguel Chamber of Commerce
Lake Elsinore Valley Chamber of Commerce
Lomita Chamber of Commerce
Los Angeles Area Chamber of Commerce
Motion Picture Association
NAIOP California
National Association of Theater Owners of California
National Electrical Contractors Association
National Federation of Independent Business
Newport Beach Chamber of Commerce
Northern California Allied Trades
Oceanside Chamber of Commerce
Official Police Garages of Los Angeles
Palos Verdes Peninsula Chamber of Commerce
Painting and Decorating Contractors of California
Plumbing-Heating-Cooling Contractors Association of California
PRISM – Public Risk Innovation, Solutions, and Management
Rancho Cordova Area Chamber of Commerce
Redondo Beach Chamber of Commerce
Residential Contractors Association
Rural County Representatives of California
Sacramento Metropolitan Chamber of Commerce
Sacramento Regional Builders' Exchange
San Diego Regional Chamber of Commerce
San Gabriel Valley Economic Partnership
San Marcos Chamber of Commerce
San Pedro Chamber of Commerce
Santa Ana Chamber of Commerce
Santa Barbara South Coast Chamber of Commerce
Santa Maria Valley Chamber of Commerce
South Bay Association of Chambers of Commerce
Torrance Area Chamber of Commerce
Tulare Chamber of Commerce
United Ag
United Contractors
United Chambers of Commerce of the San Fernando Valley
United Contractors
Valley Industry & Commerce Association
West Ventura County Business Alliance
Western Agricultural Processors Association
Western Carwash Association
Western Electrical Contractors Association
Western Growers Association
Western Steel Contractors
Wine Institute
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