

Southern Oregon Climate Action Now

SOCAN

Confronting Climate Change

<https://socan.eco>

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February 16th 2022

To Whom It May Concern:

I write as co-facilitator of Southern Oregon Climate Action Now on behalf of the over 1600 rural Southern Oregonians who are SOCAN. Our mission is to promote awareness and understanding of the science of global warming and its climate change consequences and motivate individual and collective action to address the resulting climate crisis. We must do this also within the framework of ensuring that social justice concerns are addressed.

While it is absolutely necessary for us to mitigate the greenhouse gas emissions that are causing global warming and the climate crisis, we must also adapt to the warming and its consequences that are inevitable. It has often been argued, as Mahatma Gandhi admonished, that the measure of a society is how it treats its most vulnerable members. It becomes clear who the most vulnerable are when society is confronted by a crisis. In the case of global warming and the heat waves and wildfires it is causing, it is obvious that the most vulnerable are the farm workers, forest workers and construction workers who must work outside in order to provide income for their families. These workers have no option but to work, and in doing so, they are at the mercy of their employers. It is incumbent upon society, through the establishment of reasonable laws, to protect the vulnerable from the irresponsible and unscrupulous employers who refuse to grant them reasonable protections.

To protect workers from heat, we have to understand what causes us to overheat. There is a common misconception that heat exposure results only from ambient temperatures. This overlooks the cause of heating. The driving force behind the heating is incoming solar radiation in the visible wavelength range. This reaches the surface of the earth, whether our concrete or our bodies, and transforms into heat. That heat both warms the concrete and warms our bodies. It also radiates away. The temperature of the sidewalk, on a hot sunny day, can reach such proportions that we can fry an egg on it, even when the air is nowhere near as hot. It is this outwardly radiating heat that causes the so-called 'heat-island effect' wherein cities become much hotter than the surrounding natural countryside; the urban concrete absorbs and radiates much more heat than moist vegetation. Fortunately, like the vegetation, we are composed of a large percentage of water which has properties that prevent us from reaching the temperature of the sidewalk. We also can sweat, which results in cooling – so long as we are supplied with adequate water. It is critical to appreciate, therefore, that a person in the sun and thus exposed to the incoming visible range of radiation, will suffer far greater warming on a sunny day than a person in the shade. I understand that the rules include an adjustment for this difference, but my guess is that this adjustment is either insufficient or barely adequate to allow for the heating difference. The precautionary principle argues for a much greater allowance for those compelled to work in the sun if we are genuinely to care for our vulnerable friends.

Having made the case for increased consideration on the direct heating effect of sun exposure, I would like to offer some other suggestions.

It is critical that OSHA adopt rules that rely on best available current science. Specifically, protection should be initiated at 80°F with high heat procedures initiated at 90°F. Access to shade and alternative cooling measures should be accorded workers with adequate access to safe drinking water and paid cool-down breaks.

The exemption for 'light work' to be included in the rules is unconscionable; simply being out in the heat or smoke comprises hazard enough.

The requirement for mask-wearing under smokey condition should be consistent with the established health standard where an Air Quality Index of 201 triggers conditions designated as "unhealthy for everyone." Similarly, fit-tested masks should be available and required at an AQI of 301 when "hazardous" conditions are initiated.

On behalf of our many friends who work in our fields, forests and building sites, we urge the establishment of rules for their protection that are adequate to the task.

Respectfully submitted

A handwritten signature in black ink that reads "Alan R.P. Journet". The signature is written in a cursive, flowing style.

Alan R.P. Journet Ph.D.
Co-facilitator
Southern Oregon Climate Action Now