



State of Utah

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Department of Agriculture and Food

CRAIG W BUTTARS
Commissioner

KELLY PEHRSON
Deputy Commissioner

February 26, 2025

U.S. Department of Labor
Occupational Safety and Health Administration
Docket Number (OSHA-2012-0012)

Subject - Temporary Labor Camps; Extension of the Office of Management and Budget's (OMB) Approval of Information Collection (Paperwork) Requirements (OSHA-2012-0012)

The Utah Department of Agriculture and Food (UDAF) has reviewed the Department of Labor's Occupational Safety and Health Administration (OSHA) Standard Number 1910.142 titled "Temporary Labor Camps". UDAF is opposed to the proposed rule change, specifically to section 1910.142(a)(2), which states, "All sites shall be adequate in size to prevent overcrowding of necessary structures. The principal camp area in which food is prepared and served and where sleeping quarters are located shall be at least 500 feet from any area in which livestock is kept."

The requirements in this section will cause significant burden and undue harm on agricultural operations. Many sheep producers have large herds of sheep that are grazed in mountainous areas. Sheep herders are hired to move with the sheep herds to new pastures and help protect the sheep from predators. Herders use livestock (horses, mules) for transportation and to carry supplies. They will set up temporary sheep camps as they move the sheep to different pastures with the herders living on the range for several months at a time. Herders will reside at these sheep camps for several days or weeks at a time before moving to the next pasture and most keep their horses close to their camp. However, if sheep camps are required to be located 500 feet away from livestock, there is a risk to sheep and horses. Much of the terrain of rangelands in the mountains is accessible only by horseback. It is unreasonable and a risk to keep horses 500 feet away from the sheep camps. Additionally, when there is bad weather such as snow or rain, it is very difficult for the herders to be 500 feet away from their horses and this could lead to harm or injury. The herders should have the discretion to keep their horses where they would like in relation to their sheep camps. The proposed rule change is unreasonable and likely unenforceable. It is vital for agricultural productions to be supported and encouraged, rather than having unnecessary regulatory burden placed on them.

We request that this proposed rule be withdrawn. If OSHA does not withdraw the proposed rule change, UDAF requests for an exemption for agricultural operations to be included in the rule. We appreciate the opportunity to provide comments and look forward to continually working with our federal partners.

Sincerely,

A handwritten signature in black ink that reads "Craig W Butters". The script is fluid and cursive, with the first name "Craig" and last name "Butters" clearly legible.

Craig W Butters
Commissioner
Utah Department of Agriculture and Food