



Airlines for America®

We Connect the World

May 29, 2025

Re: New Mexico Environment Department Proposed Heat Illness and Injury Prevention Rule

Ms. Phoebe Suina, Chair
Environmental Improvement Board
1190 St. Francis Drive, Suite N4050
Santa Fe, NM 87505

Dear Chair Suina and members of the Board:

Airlines for America (A4A)¹, the principal trade and service organization of the U.S. airline industry, appreciates the opportunity to comment on the proposed heat illness and injury prevention rule.

Due to the nature of scheduled commercial airline services, this proposed rule has the potential to create a number of operational problems for our industry:

- **Heat exposure assessment:** Further clarity is desired as to whether this assessment would occur only initially or continue to be performed regularly. A one-time heat exposure assessment that informs the control measures is strongly preferred to continuous assessment, particularly in light of the consistent summer heat and the work activities within our members' operations.
- **Acclimatization:** Restricting work activities to implement gradual acclimatization could initially have a significant impact on multiple flights per day per affected employee. Incremental allowances of heat exposure beginning at 80°F Temperature-Humidity Index (THI) would reduce existing available staffing and require hiring additional employees to fulfill work assignments. Similar acclimatization schedules, such as those proposed in federal OSHA's heat related illness proposed rule, provide high-heat triggers as an alternative to gradual acclimatization. The New Mexico proposed rule instead compounds requirements.
- **Rest breaks and staffing:** During high-activity periods, aircraft arrive and disembark from an assigned gate within an average of 30-60 minutes. When heavy work is occurring outdoors with the heat index at 95, it is neither efficient nor sustainable to rotate a ramp crew after working 45 minutes. To do so (i.e. replacing crew in the middle of a turn) would require additional briefings and potentially cause confusion or error in the loading of cargo or other necessary flight preparations.

¹ A4A members are: Alaska Airlines, Inc.; American Airlines Group Inc.; Atlas Air, Inc.; Delta Air Lines, Inc.; Federal Express Corporation; Hawaiian Airlines, Inc.; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada, Inc. is an associate member.

- Emergency response in Albuquerque: Albuquerque, New Mexico, frequently handles flights diverted due to medical emergencies, weather conditions or aircraft maintenance issues. These additional flights can require an 'all-hands' response in order to manage the additional workload and receive an unscheduled arrival. Attending to these aircraft and passenger needs is imperative and should be considered for relief in these situations.
- Scheduling clarity: Further clarification is desired regarding work/rest schedules.
- Recordkeeping: Additional recordkeeping requirements proposed for detailed individual employee monitoring, environmental tracking and crew scheduling impart a greater administrative workload to supervisors, who need to be available to the operation they lead.

We would appreciate the opportunity to further discuss these and other challenges we see with application of this rule to commercial aviation.

Sincerely,

A handwritten signature in cursive script that reads "Cory Snyder".

Cory David Snyder
Director Aviation Safety and Operations
Airlines for America