

NM Environmental Improvement Board c/o NM Environment Department

1190 St. Francis Drive, Suite N4050

Santa Fe, NM 87505

Dear Environmental Improvement Board:

In the matter regarding a proposal to create regulations for "Heat Illness and Injury Prevention" I submit the following.

As it is written this rule will be impossible to be and to stay in compliance. I'm a dairy producer not a climatologist and in reading this proposal it is detrimentally lacking in many specifics such as:

- Creating a plan but no details as to how to create a plan.
- It talks about acclimatization but doesn't tell me how and doesn't support it. with any research.
- it talks about conducting a heat assessment without specifying on how to measure or conduct it.
- No guidance of what constitutes light medium or heavy intensity work.
- It doesn't define what is considered "usual duration of work in my business",
- The duration after returning from absence is undefined and the possibility of having a worker on 45 minute break is madness.

These proposed rules demonstrates a lack of understanding of agriculture labor patterns. This rule is simply not attainable and would completely undermine my operational efficiency and expose me to legal liability. I ask you to oppose this proposal.

Sincerely,

Deborah Porter
Porter Farms, LLC