

Jeremy Armstrong

Thank you for the opportunity to comment on the New Mexico Environment Department's proposed Heat Illness and Injury Prevention Rule.

As a private citizen and someone who cares deeply about both worker safety and the health of our local economy, I have serious concerns about the direction of this rule. While I absolutely support the goal of protecting workers from extreme heat, I worry that the approach outlined here may do more harm than good.

This rule appears to impose broad, one-size-fits-all mandates on businesses—many of which are already doing their best to keep their employees safe. Small businesses in industries like agriculture, construction, and energy are already facing workforce shortages and economic strain. Adding costly compliance requirements could make it even harder for them to operate, grow, or hire. Additionally, it will make owning a home even less affordable.

One other issue that has been overlooked is the impact on first responders. For example, mandatory rest periods and access to shade or cooling stations may not be practical in active emergency situations. Response times could be severely impacted should a crew have to wait the mandatory 45 minutes before responding to another call. Smaller departments may also struggle with the costs of implementing new equipment or tracking systems to meet compliance requirements.

I believe we can address heat safety without expanding government regulations that might unintentionally create more problems than they solve. Instead of mandates, let's look at voluntary programs, educational resources, and partnerships that help businesses implement practical, tailored heat safety practices.

Please consider the economic impact of this rule, especially on small employers and rural communities. Also consider the fact that while heat-related deaths have risen in New Mexico, the majority of those come from migrants crossing into our state and are in no way job related. Let's find a way to keep workers safe without adding unnecessary burdens that slow down job growth and innovation in our state.

Thank you for listening.