

New Mexico Association of Conservation Districts



NEW MEXICO ASSOCIATION OF CONSERVATION DISTRICTS NMACD

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May 20, 2025

RE: Proposed Heat Illness and Injury Prevention Rule

Dear Miss Pete,

On behalf of the New Mexico Association of Conservation Districts (NMACD), which represents 45 of the 47 Soil and Water Conservation Districts (SWCDs) across the state, we write to express serious concerns regarding the "Proposed Heat Illness and Injury Prevention Rule" issued by the New Mexico Environment Department (NMED), Occupational Health and Safety Bureau (OHSB).

Many SWCDs have raised alarms about the increasing difficulty of preventing and recovering from natural disasters such as wildfires and floods. For example, the Hermits Peak/ Calf Canyon Fire occurred three years ago, and yet the affected areas still face ongoing recovery challenges. These realities highlight the importance of regulatory policies that are both effective and practical.

Unfortunately, the proposed rule lacks the sufficient data necessary to justify its stringent requirements. As written, it imposes a set of mandates that are largely unworkable for agricultural and conservation-based employers and employees, particularly in rural New Mexico. The rule not only risks halting essential conservation work but also threatens to significantly increase operational costs.

The proposed regulation appears to be an example of regulatory overreach—impractical to implement, difficult to enforce without significant resources, and burdensome to those it intends to protect. It does not adequately account for the unique conditions under which agricultural and field-based conservation work is performed.

For these reasons, the New Mexico Association of Conservation Districts respectfully urges the New Mexico Environment Department to withdraw the Proposed Heat Illness and Injury Prevention Rule and instead engage with the agricultural and conservation communities to develop a more balanced, data-driven approach that ensures both worker safety and the continued protection and stewardship of New Mexico's natural resources.

Sincerely,

Debbie Hughes



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Debbie Hughes, NMACD Executive Director