

Cash Properties LLC

As a contractor in New Mexico, I am strongly opposed to this proposed Heat Illness and Injury Prevention Rule. It's a textbook example of government overreach: expensive to implement, impossible to apply evenly across industries, and completely out of touch with the realities of actual job sites.

Let's be real—a "20-minute paid break" turns into at least 30 minutes lost once you factor in getting off the site, finding shade or a cooling area, then getting back to work. Multiply that across crews and across job sites, and you've just crippled productivity. Time-sensitive work like concrete pours doesn't pause nicely for bureaucratic checklists.

This rule might sound good in theory, but it doesn't solve a real problem. Your own numbers show that just 52 work-related heat illness cases occurred statewide over two months. That's less than one per day across tens of thousands of workers. The idea that we need sweeping new regulations for this is absurd.

What's worse—this is the thin edge of the wedge. First, it's excessive summer heat. What's next? Restrictions on cold weather work? Dust? Wind? At some point, you just won't be able to build anything in New Mexico.

We already take heat seriously. We hydrate our crews, adjust schedules, and provide training—not because of a rule, but because it's the right thing to do. The bad actors won't follow this law anyway, and the good ones are already going above and beyond. This rule punishes responsible employers while doing nothing to stop the ones who cut corners.

Please stop rushing this through. If you're serious about worker safety, collaborate with industry leaders to build a performance-based, state-specific, and realistic solution—not this one-size-fits-none mandate.