

Gabriel Browne

I carefully read the proposed rule and reviewed your tables.

I am an employer in the construction industry in Santa Fe. Our company employs about 10 people, about 6 of those work outside on jobsites full time. I care deeply for my employees and their health and safety. While I agree with the overall concern, and I agree with some of the Control Measures, I think creating a plan and having employees who are tasked with managing that plan is inefficient, ineffective, and not likely to increase wellbeing for the employees. While I think there might be employees who set inhumane expectations for their employees, I think those are the exception, rather than the rule. Further, I think these sorts of top down mandates increase costs, increase overhead, and don't effectively make things safer. This isn't how OSHA, and this very similar approach are set up, but I think employees should be given rights, the employee should be given information about their rights as an employee, and they should be able to enforce those rights through a reasonable process. One such right that every human should have is the right to work in a humane environment, and not being overly burdened by heat should be part of that. I think minimum, or in some places, living wage laws work that way. In my company, we do have plans to deal with overexposure to heat, but they aren't written, and they rely on common sense and decency. They aren't written.