

## Margaret Karler

I believe there are already existing standards in place (general duty clause and the Heat Illness Prevention Campaign by OSHA) in NM without implementing an onerous Heat and Illness state standard. AS a former Safety Director in construction, I know we have always provided water and shade and acceptable rest periods as needed - if we didn't, we wouldn't have an effective workforce nor would we be in compliance with existing standards. The newly proposed standard would negatively impact our workforce (childcare arrangements, scheduling of apprenticeship classes, safety issues working in low light environments, etc.) and negatively impact contractors' ability to complete work efficiently and in a timely manner (already impacted by the lack of skilled construction labor). The newly proposed standards are based on heat conditions in other parts of the country where humidity plays a role - this is not applicable to NM. I believe contractors should be allowed to devise their own written Heat Illness Prevention Plans that are applicable to the NM climate and type of work being performed.

I urge you to NOT MOVE FORWARD with the proposed state Heat and Injury Illness Rule as it is currently proposed.

Respectfully,  
Margaret Karler