

Santa Fe Area HBA - Northern New Mexico Builders Association, NAHB Affiliate

May 29, 2025

New Mexico Environmental Improvement Board
Harold Runnels Building
1190 St. Francis Drive, Suite N4050
Santa Fe, NM 87505

Dear Members of the Environmental Improvement Board,

I write to respectfully urge the Board to consider exempting the construction & home-building industry from the proposed heat rule in its current form. While the intent to protect workers from the rising intensity of climate-change-driven heat-related worksite peril is necessary, the unique operational realities of our industries require a tailored approach to ensure worker safety and the continued vitality of New Mexico's construction and home-building sector.

Construction and home building are inherently dynamic, outdoor industries that face unpredictable schedules, tight project timelines, and varying site conditions. We need to be nimble. A one-size-fits-all heat rule will inadvertently halt projects, increase costs, and jeopardize jobs - ultimately impacting economic growth, the viability of running businesses in our sectors, and have negative impacts on housing availability and affordability across our State. These consequences will be severe for small businesses and rural contractors, who lack resources to adapt to sweeping regulatory changes.

Rather than imposing a blanket regulation, we propose the Board convene a working group composed of construction and home-building professionals, and representatives from the New Mexico Environment Department, OSHA. This collaborative effort would allow industry experts and regulators to better understand real-world realities of the industry and jointly develop practical, effective policies that protect workers from heat hazards while also accommodating the operational needs of the construction sector. Such a working group could examine best practices, explore innovative solutions (many of which are already in practice), and ensure that new requirements are both feasible and enforceable.

By engaging directly with those most affected, the Board can craft a policy that achieves shared goals for worker safety without causing deleterious harm to New Mexico's construction and home-building sectors. We look forward to supporting this important dialogue.

Thank you for your consideration.
Sincerely,

Miles D. Conway, Executive Officer



Santa Fe Area
Home Builders Association
Northern New Mexico
Builders Association

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