

Holly Woelber

Thank you for the opportunity to comment on the proposed Heat Related Rule. I would like to initially note that the following groups are not mentioned in the requirement to comply:

1. Government workers, such as those who do outside work like landscaping, street repair, building maintenance, trash pick-up, etc
2. Schools (6- post-secondary) that have athletic programs requiring students to practice in the heat of the day, often times in pads or full dress-out
3. Other businesses/industries that require employees to work outside to do their jobs.
4. Non-profits

Secondly, the Rule, as I read it, will result in another burden on small businesses requiring a great deal of time doing paperwork, which must be kept for 5 years, loss of productivity, and expenses to implement. Small businesses care about our employees and are not going to place them in a situation where they will become ill. We also do not ask them to work in any environment that we ourselves won't work in. Labor is too scarce a commodity in New Mexico, with only 47% of persons eligible to work, having employment.

I ask that this Rule not be implemented, instead, the NMED OSHA department conduct educational outreach to all employers: government, non-profits, schools and businesses. If, after three years, there is no decrease in heat related workman's comp cases in NEW MEXICO (not anywhere else) the Rule can then be reviewed, placed out for public comment and possibly implemented.

Thank you for your attention to this matter.