

Charlotte Ortiz

To the New Mexico Environmental Improvement Board,

I am writing to express my opposition to the proposed Heat Illness and Injury Prevention Rule (11.5.7 NMAC). While I appreciate the intent to protect employees working in heat, the proposed mandates introduce an excessive and impractical burden on small and mid-sized businesses across our state.

As a business owner, I already take employee safety seriously and implement reasonable, job-specific measures to ensure their wellbeing in high-heat conditions. However, requiring employers to create and maintain written heat illness prevention plans, conduct exposure assessments, monitor acclimatization schedules, keep detailed records, and adhere to rigid rest break structures is not conducive to the realities of day-to-day operations—especially in industries like construction and roofing.

Mandating a highly prescriptive, one-size-fits-all policy across diverse work environments fails to recognize the experience and safety practices already in place at many companies. It also risks reducing productivity, increasing administrative costs, and penalizing employers who are already acting in good faith.

I respectfully urge the board to reconsider this approach.