



# FOOTHILL READY-MIX INC.

11415 HWY 99 W., RED BLUFF, CA 96080  
(530) 527-2565 • FAX (530) 527-6976  
No. California 1-800-624-8141



EST. 1979

December 10, 2008

Clerk of the Board  
California Air Resources Board  
Via Fax 916-322-3928

Ladies and Gentlemen:

We are a small Mom and Pop concrete company with 15 employees that operates 12 concrete mixer trucks (we downsized from 14 this year) in Tehama County. All of our trucks are year 2000 or older due to the fact that the demand for concrete in this area cannot economically justify using newer equipment.

Your proposed on-road diesel regulation threatens our very existence. The proposed retrofits may cost more than the truck itself is worth; especially given the economic turmoil we face. Larger companies, especially those with Ready Mix plants in other states will simply transfer their trucks to their out-of-state operations. Many other small ready mix companies will simply sell their old vehicles elsewhere in the world. The regulation then, makes sense only if it applies globally, not just in California.

The Construction Industry is in a deep Depression, financing is not available for a fleet retrofit and, given the local economy, we have very real concerns as to how we would pay off such financing even if we were able to obtain it.

In addition, we question whether the technology exists to accomplish what the proposed regulation requires. Our trucks spend a large part of the time in a stationary position (loading, unloading, etc.). We have serious doubts that the passive filters will not be constantly clogged.

I am writing to urge the Air Resources Board to either phase-in the proposed diesel truck retrofit regulation or delay it altogether. Let us allow the technology to catch-up with your requirements. Perhaps in the meantime the economy will improve to the point where we can pay to accomplish what you require of us.

Sincerely,

Kevin L. Brunnemer  
President