AMERICAN CONCRETE PUMPING ASSOCIATION
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Dear Members of the California Air Resource Board,

The American Concrete Pumping Association consists of concrete pumping companies, manufacturers, and distributors of concrete pumping equipment. Although concrete pumps are classified as on-road construction equipment, many of our members own and operate multiple types of off-road construction equipment as well.

As a member of the "Coalition To Build A Cleaner California", I would encourage the board to adopt the coalition's alternative proposal to the In-Use Off-Road Diesel Fuel Engine Regulation which was submitted to the CARB by the Coalition in July of 2007.

The current downturn of the construction industry coupled with rising fuel and labor costs have already had an adverse effect on small and large businesses. To impose stringent time frames for which to implement the fleet average emission limits would create additional hardship by forcing insurmountable capital expenditures. Replacement of these types of engines is a major expense and the coalition estimates that contractors who do not have the money to comply with CARB's requirements will most likely have to deplete their fleets. This will create a loss of as much as 30,000 pieces of construction equipment not only causing a dramatic effect on the cost of construction, but by which further creates a mass disposal of used equipment before the useful life has been completed. The delays and increase in costs of many of California's construction projects along with the loss of jobs and employment revenue will all result in devastating long term effects on the state's economy.

To implement the coalition's alternatives to the current CARB proposal would help to ensure the health and financial stability of California businesses, maintain construction cost to a minimum, keep the current Rebuild California bond program on schedule, and would ultimately create the cleanest construction fleets in the world.

Respectfully submitted,

Christi Collins
Executive Director