



National Marine Manufacturers Association  
650 Massachusetts Avenue NW  
Suite 520  
Washington, DC 20001

12/02/2022

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Rajinder Sahota -Deputy Executive Officer, Climate Change and Research

Cheryl Laskowski - Branch Chief, Low Carbon Fuel Standard

**RE: Comments on the importance of sustainable liquid fuels for recreational marine**

Dear Ms. Sahota and Ms. Laskowski,

The National Marine Manufacturers Association is pleased to comment on the California Low Carbon Fuel Standard.

NMMA is the trade association for the U.S. recreational boating industry, representing nearly 1,300 marine businesses, including recreational boat, marine engine, and accessory manufacturers. Our members are often U.S.-based small businesses, many of which are family owned. NMMA members collectively manufacture more than 85 percent of the marine products sold in the U.S. Furthermore, the recreational boating industry has a \$170 billion impact on the nation's economy and in communities across the country, with nearly 700,000 American jobs across 35,000 U.S.-based marine businesses.

NMMA and its membership have been a leader in demonstrating and approving next-generation fuels for use in recreational boats. We have successfully worked alongside the US Department of Energy and Argonne National Laboratory to comprehensively test and approve biobutanol fuel blends up to 16.1 vol percent for use in all recreational marine engines and boats<sup>1</sup>. The multi-year testing report is attached for reference and demonstrates one of the significant ways our industry is committed to reducing CO<sub>2</sub> emissions from recreational craft<sup>2</sup>.

Sustainable liquid fuels are of strategic importance to our industry. Similar to the aviation and shipping industries, recreational boats require a significant amount of energy to meet the range and performance requirements recreational boater's demand. Energy dense fuels are required to minimize boat weight, particularly on planning hulls. Recreational boats also have a very slow rate of retirement, more than

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<sup>1</sup> US Department of Energy Alternative Fuels Data Center [https://afdc.energy.gov/fuels/emerging\\_biobutanol.html](https://afdc.energy.gov/fuels/emerging_biobutanol.html)

<sup>2</sup> Recreational Marine Biobutanol Test Program and reports <https://www.abetterbiofuel.com/publications-and-approval>



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twice that of automotive, which means recreational boats can be in operation for over 20 years or more<sup>3</sup>. There are currently 12 million registered powerboats in the United States<sup>4</sup> which will continue to rely on a source of liquid fuels for many years to come. Ensuring a supply of low carbon sustainable fuels will make a significant difference in the ability to reduce CO<sub>2</sub> emissions from the recreational boating sector.

NMMA has recently started a Sustainable Marine Fuels Taskforce which is comprised of renewable fuel manufacturers, fuel distributors, and boat and engine manufacturers. The purpose of the taskforce is to bring influential players to the table that can help realize the viability of sustainable fuels for use in recreational boats and engines. The overall contribution of CO<sub>2</sub> emissions from the recreation marine sector relative to transportation in the United States is quite low, accounting for approximately 0.7% in the United States and 0.1% in Europe, for example. However, the industry is doing its part to reduce CO<sub>2</sub> emissions through use of multiple technologies and will continue to rely upon sustainable liquid fuels.

We ask that the state of California recognize the important role sustainable liquid fuels will play in the recreational marine sector. We also ask that the state of California further expand options to encourage the production and use of sustainable liquid fuels and ensure that the State is leading in these developments.

Respectfully,

Jeff R. Wasil  
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<sup>3</sup> National Marine Manufacturers Association (NMMA) 2021 U.S. Recreational Boating Statistical Abstract Full Report <https://www.nmma.org/statistics/publications/statistical-abstract>

<sup>4</sup> Op. cit. NMMA Statistical Abstract