



February 12, 2015

Chairman Mary Nichols and Members of the Governing Board
California Air Resources Board
CAL/EPA Building
1001 I Street
Sacramento, CA 95814

Dear Chairman Nichols and Members of the Air Resources Board:

The National Marine Manufacturers Association (NMMA) supports the modified staff proposal for the Board to Adopt Evaporative Emission Requirements for Spark-Ignition Marine Watercraft, represented in the updated 15-day Notice.

Over the past 18 months the ARB staff has worked closely with the NMMA leadership and members to develop a regulatory framework that considers the significant economic challenges currently facing boat builders and marine dealers in California, while at the same time achieving the necessary air emission reduction goals embodied in the Board's State Implementation Plan (SIP). NMMA would like to especially thank the executive and management staff team of Dr. Ayala, Annette Hebert and Michael Benjamin for their personal involvement and attention in working through some thorny issues with boat builders to streamline the important administrative elements of the rule. Their involvement made a significant difference in this endeavor.

As we move forward to implementation of the rule in 2018, NMMA is encouraged that by continuing to work with ARB staff we will be able to further streamline some of the more complicated and potentially onerous administrative elements. Also we were particularly hearted by the program leadership team's commitment to properly communicate the certification requirements to all boat builders (both large and small) who may have boats to offer for sale in the Golden State.

Thank you for the opportunity to provide these comments and NMMA looks forward to publicly supporting the rule at the Public Meeting on February 19, 2015.

Most sincerely,

A handwritten signature in cursive script that reads "John McKnight".

John McKnight
Vice President, Government Affairs
National Marine Manufacturers Association (NMMA)

Cc: Richard Corey, Executive Office
Alberto Ayala, Deputy Executive Officer
John Dunlap, Environmental Consultant to NMMA