



South Coast Air Quality Management District

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*Office of the Executive Officer
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July 18, 2008

Mr. James Goldstene
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Dear Mr. Goldstene:

SCAQMD Staff Recommendation for the California Air Resources Board to Adopt
Proposed Amendments to the Current Spark-Ignition Marine Engine and Boat Regulations

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to provide comments on California Air Resources Board (CARB) proposed amendment to the spark-ignition marine engine and boat regulations. Recreational marine engines and boats in particular remain a significant source of air pollutant emissions in the South Coast Air Basin (Basin). This source category includes outboard engines, personal watercraft (e.g., jet skis), inboard engines (including inboard jet boats), and sterndrive engines and contributes 17.3 tons per day of NO_x and 62 tons per day of VOC emissions in the Basin. Reductions from this source are critical for the attainment of the federal annual PM_{2.5} and 8-hour ozone ambient air quality standards.

The most significant changes proposed include a relaxation of the existing exhaust emission standards for small volume manufacturers of high performance sterndrive/inboard (SD/I) engines above 373 kilowatts (500 hp) to address technical issues with catalytic controls on these engines. The relief proposed for small volume manufacturers of high performance SD/I engines allows compliance with less stringent exhaust emission standards because catalyst control technology is not feasible on these high performance engines. As a result, there will be a potential loss of emission reductions statewide of 0.36 tons/day in 2010 and in 2020, 2.03 tons/day of NO_x and ROG combined. The proposed amendments would mitigate this loss by requiring that all boats powered by high-performance SD/I engines be equipped with evaporative emission controls. In addition, high-volume dual-category manufacturers (i.e., manufacturers that sell at least 45 units both high- and standard-performance engines annually) would be required to meet the existing more stringent exhaust emission standards. The proposed amendments would also allow high-

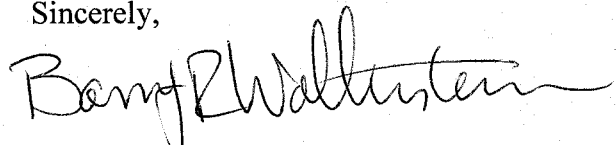
volume dual-category manufacturers the flexibility to achieve equivalent emission reductions using a combination of more stringent emission limits and evaporative controls on their standard-performance engines if they are not able to meet the existing exhaust emission standards for the high performance engines. AQMD staff believes this is appropriate as these large volume manufacturers have more options to achieve additional emission reductions needed to ensure the emission benefits of the regulation remain the same.

The proposed amendments would also align the definition of "jet boat" and "sterndrive/inboard engine" with the federal definition and will require jet boat engine manufacturers to meet the more stringent SD/I exhaust emission level of 5.0 g/kW-hr ROG+NOx standard instead of the outboard/personal watercraft 16.0 g/kW-hr ROG+NOx exhaust standard. We agree with your staff that jet boats compete in the same market as the boats powered by SD/I engines. Additionally, similar engines are typically used in jet boats and they can easily be outfitted with catalyst technology (as has been on the SD/I engines) to meet the more stringent exhaust standards. As such, the SCAQMD staff believes the proposed amendment is reasonable and appropriate.

While we believe that the proposed amendments will result in no loss of emission benefits compared to the existing regulation, we urge you to move forward to develop regulations to further control exhaust and evaporative emissions from recreational marine engines as committed in the 2007 State Implementation Plan (SIP). Given the critical need for the South Coast Air Basin to attain federal ambient air quality standards, we look forward to working with your staff as you develop future amendments to further reduce emissions from recreational marine engines.

In conclusion, we urge the CARB Board to adopt the proposed amendments at its July 24, 2008 meeting and that your staff begin development of further control requirements to meet the commitments in the 2007 SIP. Thank you again for the opportunity for providing these comments. If you have any questions about these comments, please feel free to call me or Mr. Henry Hogo, Assistant Deputy Executive Officer - Mobile Source Division, Science and Technology Advancement, at 909-396-3184.

Sincerely,



Barry R. Wallerstein, D.Env
Executive Officer

CSL:HH:ZP:RP

cc: CARB Board Members
Mr. Tom Cackette, CARB
Mr. Bob Cross, CARB
Mr. Mike Carter, CARB
Ms. Scott Rowland, CARB