

John McKnight  
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**Testimony of John McKnight before the California Air Resources Board  
regarding the Public Hearing to Consider Amendments to the Current  
Spark- Ignition Marine Engine and Boat Regulations  
Sacramento, California  
July 24, 2008**

Good morning afternoon. My name is John McKnight and I am the Director of Environmental and Safety Compliance for the National Marine Manufacturers Association. To begin, I would like to thank CARB staff for working with the marine engine manufacturers to identify the amendments that are necessary to improve the existing California rule and bring it into line with many of the changes that have happened and will be happening on the Federal Level.

NMMA urges the board to consider and approve these staff recommended amendments to the Spark Ignition Marine Engine and Boat Regulations with the following exceptions and / or revisions.

The board will hear the testimony of Mark Riechers, Mercury Marine, Paul Ray, Ilmor and Dan Ostrosky, Yamaha. It is critical that their issues be resolved in a positive manner as they affect the entire boating industry. NMMA supports their comments.

NMMA has two main issues where we would appreciate the board's consideration.

CARB staff has recommended that the board approve a limit for carbon monoxide emissions from outboard and PWC engines rather than to allow averaging these emissions as the EPA plans to finalize. NMMA supports the CARB plan for reducing CO emissions from SD/I engines and we can support a regulation to reduce CO emissions from outboard and PWC engines, with a 2010 implementation date, but only if it harmonizes with the EPA plan.

The only reason that California would have to regulate CO emissions from outboard and personal watercraft would be to protect human health and safety. The EPA, USCG, NIOSH and industry have worked together to review the accident and fatality data from CO poisoning on recreational boats and NIOSH has conducted several studies to measure CO levels on boats. The vessel design and the operation of an outboard and PWC and the USCG statistics do not support the need for a CO standard with a limit. CARB staff will tell you that this amendment errs on the side of safety, but from our perspective by not harmonizing with EPA, this amendment will result in an additional economic cost to the citizens of California with no health and safety benefit.

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The second issue has to do with the staff request that the executive officer have discretion to make technical changes to the regulation. NMMA supports this amendment as the EPA rules are not yet final and the more that CARB aligns with EPA the better industry can utilize its resources. With the latest USEPA rule there will be virtually no difference between the ARB marine regulations and EPA marine regulations. The only issues may be minor technical issues that from industry's perspective if not resolved quickly can be very burdensome.

NMMA appreciates the opportunity to testify on this important issue.