

April 25, 2017

Mr. Richard Corey, Executive Officer

California Air Resources Board
Transportation and Toxic Division
1001 I Street
Sacramento, CA 95814

Dear Mr. Corey:

The National Marine Manufacturers Association (NMMA) has been working with your staff to implement a California evaporative emission regulation for recreational watercraft. This effort has required working with evaporative emission component manufacturers, evaporative emission marine fuel system manufacturers, and corresponding with the hundreds of boat builders who sell boats to California dealers and citizens. As you know, this has been a monumental undertaking for both NMMA and your staff.

At this time, testing for two of the three required evaporative emission components (fuel lines and plastic fuel tanks) have either received California executive orders, or are in the queue to receive them in time for the June 1, 2017 start of Model Year 2018. For diurnal components, pressure relief valves and canisters, additional time is needed for component manufacturers. These manufacturers require more time to complete testing, apply for executive orders, and have their products available to fuel system manufacturers and boat builders, so that they can be certified and installed for Model Year 2018.

NMMA is requesting that the California Air Resources Board approve an extension until Model Year 2019 for the ARB diurnal component of a vessel fuel system. All boats sold in California would have California certified fuel hoses and plastic fuel tanks, and be equipped with EPA certified diurnal controls. This relief will provide our boat builder members with the time they need to comply with regulatory standards. It will also provide the component manufacturers time to properly test their components and receive executive orders. With this limited extension, NMMA is committed to working with our members and your staff to insure a full implementation in Model Year 2019.

Thank you for your consideration of this important matter.

Sincerely,



John McKnight, Senior Vice President

Government Relations

Cc: Thom Dammrich, NMMA President