

March 31, 2009

The Honorable Thomas R. Carper
Chairman, Subcommittee on Clean Air &
Nuclear Safety
Committee on Environment & Public Works
United States Senate
Washington, D.C. 20510

The Honorable David Vitter
Ranking Member, Subcommittee on Clean Air
& Nuclear Safety
Committee on Environment & Public Works
United States Senate
Washington, D.C. 20510

Dear Mr. Chairman and Senator Vitter:

The National Marine Manufacturers Association (NMMA), the nation's leading recreational marine industry trade association, appreciates the Subcommittee's oversight and examination of the Environmental Protection Agency's implementation of the Renewable Fuels Standard (RFS). While NMMA strongly supports viable renewable fuels and reducing America's dependence on foreign sources of oil, we strongly oppose administrative or legislative efforts to increase the current cap on the amount of ethanol permitted to be blended into gasoline *until and unless* independent and comprehensive testing has been completed on marine engines, fuel systems and components. This testing must be methodologically robust and demonstrate, as is currently required by Clean Air Act Sec. 211(f)4, that intermediate ethanol blends (whether E12, E15 or E20) will not pose a risk to marine engines, boaters or the environment.

NMMA represents nearly 1,700 boat builders, engine manufacturers, and marine accessory manufacturers who collectively produce more than 80 percent of all recreational marine products made in the United States. With more than 59 million adult recreational boaters, the marine industry is a major consumer goods industry with expenditures on recreational marine products and services of \$37.5 billion in 2007 alone. Recreational boating has an overall economic impact in the country of over \$100 billion annually, and supports more than 337,000 jobs nationwide. Additionally, there are more than 18 million recreational boats currently in operation in the United States, with marine engines and fuel systems all designed, calibrated and EPA-certified to run on not more than 10 percent blended ethanol gasoline.

Given the enormous amount of legacy boats and marine engines in the marketplace, NMMA strongly urges Congress, EPA and the Department of Energy to move cautiously with respect to mid-level ethanol blends to ensure there is no risk to the consumer, the environment or the products currently on the market. Currently, neither EPA nor DOE have conducted any testing of mid-level ethanol on marine engines or equipment, despite NMMA's submission of a formal test plan to DOE nearly a year ago. The recent petition submitted by Growth Energy, a new lobbying organization representing ethanol producers, under Clean Air Act Section 211(f) requesting a waiver for E15 makes no mention of marine engines and cites no study of the potential impact of intermediate ethanol blends on boating consumers or marine equipment.

NMMA welcomes testing by EPA and DOE pursuant to Clean Air Act requirements and would

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hope that these federal agencies move expeditiously with an examination of the potential impacts intermediate ethanol blends will have on the boating consumer, the marine manufacturer and the marina operator.

To ensure that there will not be damage to air quality, the boating consumer or their gasoline-powered marine equipment, there must be a comprehensive analysis of the impacts of ethanol blends higher than E10 on all gasoline-powered on-road and non-road engines, equipment and vehicles. Section 211(f)4 of the Clean Air Act, recently strengthened by the Energy Independence and Security Act (EISA), requires nothing short of a thorough review process designed to protect consumers, manufacturers and the environment. We strongly believe the Clean Air Act provides a clear directive and a responsible policy pathway forward. Again, on behalf of our manufacturers and consumers, we strongly oppose any effort to undermine the scientific review process with respect to the introduction of any new fuel, such as E12, E15, or E20 by agency declaration or legislative fiat.

We appreciate the opportunity to share our views on this critical matter and welcome the Subcommittee's continual and strong oversight on this issue. Please do not hesitate to contact me if you need further information or if I can be helpful in any way at mdunn@nmma.org; (202) 737-9760.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mathew P. Dunn', with a horizontal line extending to the right.

Mathew P. Dunn
Legislative Director

CC: Senator Barbara Boxer, Chairman, Committee on Environment & Public Works
Senator James Inhofe, Ranking Member, Committee on Environment & Public Works
Members of the Committee