

April 11, 2019

The Honorable Frank Pallone
Chairman, Energy and Commerce Committee
U.S. House of Representatives
237 Cannon House Office Building
Washington, D.C. 20515

The Honorable Greg Walden
Ranking Member, Energy and Commerce
Committee
U.S. House of Representatives
2185 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Pallone and Ranking Member Walden:

On behalf of the National Marine Manufacturers Association (NMMA), I write to you today expressing the recreational boating industry's support for commercialization of biobutanol fuel blends, and to encourage the committee to consider expanding fuel choice in the marketplace for our members and their consumers.

By way of background, NMMA is the leading recreational marine trade association in North America, representing nearly 1,300 boat, engine, accessory and trailer manufacturers. Recreational boating is a significant contributor to the U.S. economy, generating \$170.3 billion in annual economic impact that supports more than 35,000 businesses and 690,000 jobs. Additionally, the outdoor recreation economy as a whole – which is driven by boating and fishing and includes RVing, guided tours, and motorcycling and ATVing – accounts for 2.2% of U.S. GDP, \$734 billion in gross economic output, and 4.5 million jobs. In terms of GDP, outdoor recreation is larger than mining, utilities, and chemical products manufacturing.

Each year 142 million recreational boaters take to the water in about 12 million registered boats, consuming about 2.3 billion gallons of gasoline. NMMA members have long sought new, sustainable fuels that meet the rigorous performance standards needed for marine engines.

To that end, NMMA and the American Boat and Yacht Council (ABYC), under the direction and guidance of the U.S. Department of Energy and Argonne National Laboratory, conducted a study to evaluate the performance of recreational marine engines and vessels operated on biologically produced butanol fuel. The comprehensive data collected during this multi-year test program determined that biobutanol blends up to 16.1 vol% can be used in recreational marine engines and boats without deterioration of engine/boat performance, emissions characteristics, durability, or runability. Moreover, butanol blends up to 16.1 vol% may mitigate many fuel related issues experienced with ethanol fuels, primarily related to phase separation and corrosion. Research found that biobutanol is significantly more resistant to phase separation than ethanol and is also less corrosive to fuel system component materials such as fuel tanks, fuel hoses, primer bulbs, gaskets, and o-rings when compared to ethanol.

It's important to also note that lack of phase separation and low solvency means that biobutanol could be transported in the existing pipeline distribution infrastructure, minimizing the need for truck and rail transportation, which is required for ethanol. Additionally, when added to gasoline, biobutanol lowers the Reid Vapor Pressure (RVP) of the finished gasoline blend which results in lower evaporated emissions and allows for a less costly gasoline blend stock.

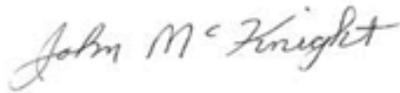
Given these results and the known issues associated with ethanol fuels and the ongoing push toward higher quantities of ethanol such as E15, the marine industry has come together to advance biofuel, such as biobutanol, with properties more suited for the marine environment than ethanol. The Environmental Protection Agency's (EPA) decision last year to allow 16% butanol/isobutanol blend for on road fueling was an important first step, but expeditious removal of unnecessary regulatory barriers to expand market access for biobutanol will be critical to ensure this fuel is allowed to reach the marine market in the upcoming 2019 boat season.

NMMA appreciates your consideration of expanding fuel choice in the marketplace and looks forward to continuing to work with the EPA and your committee to ensure boaters have a safe and reliable fuel supply.

Sincerely,



Nicole Vasilaros
Senior Vice President of Government Relations and Legal Affairs
National Marine Manufacturers Association



John McKnight
Senior Vice President of Environmental Health and Safety
National Marine Manufacturers Association