



April 24, 2013

AmericanMotorcyclist.com

Kelley Oehler
Branch Chief
Regulations and Paperwork Management Branch
U.S. Department of Agriculture
STOP 0742
1400 Independence Avenue, S.W.
Washington, DC 20250-0742

Dear Branch Chief Oehler:

The American Motorcyclist Association is writing to you regarding the U.S. Department of Agriculture's Rural Energy for America Program's grant and loan program for renewable energy systems (e.g., special ethanol blender pumps) published in the *Federal Register* on April 12 [FR Doc No: 2013-07273].

Founded in 1924, the AMA is a not-for-profit association and is the premier advocate of the motorcycling community, representing the interests of millions of on- and off-highway motorcyclists and all-terrain vehicle riders. Our mission is to promote the motorcycle lifestyle and protect the future of motorcycling.

Agriculture Secretary Tom Vilsack announced in 2011 that the USDA intends to install 10,000 blender pumps by 2016. REAP will be a key component to achieve the secretary's goal and, thus, help grow the availability of E15 fuel, a blend of gasoline that includes up to 15 percent ethanol by volume.

In October 2010, the U.S. Environmental Protection Agency approved the use of E15 fuel in model year 2007 and newer light-duty vehicles (cars, light-duty trucks and medium-duty passenger vehicles). Then, in January 2011, the EPA added model year 2001-2006 light-duty vehicles to the approved list.

No motorcycles or ATVs are currently on the list or approved for E15 use by the EPA.

The AMA has repeatedly expressed concerns about E15 being mistakenly used and damaging engines in motorcycles and all-terrain vehicles, and about the continued availability of gasoline that has no ethanol, or gasoline with only a 10 percent blend, that is safe for use in motorcycles and ATVs.

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This concern is exacerbated in rural parts of the country. These special ethanol blender pumps will further limit access to E10-or-less fuel in rural areas. This will be a problem because rural areas tend to have an older legacy vehicle fleet than other parts of the country. Moreover, rural areas are the most vulnerable places for motorcyclists and users of small engine devices because options for regular gasoline may be few or even non-existent.

The REAP will help one segment of the rural economy at the cost of other segments. Ultimately, the higher costs will have a negative impact on small rural economies.

Blender pumps may increase misfueling by consumers. In fact, the EPA is concerned enough to issue a plan for retailers on its website's "E15: Misfueling Mitigation Plans" page to try to avoid misfueling by consumers.

Under the plan, retailers who use a blender pump to sell E15 and E10 fuel through the same hose must also have a separate E10/E0 fuel pump. Those retailers would be required to have a label on the blender pump that reads: "Passenger Vehicles Only. Use in Other Vehicles, Engines and Equipment May Violate Federal Law." Retailers would also be required to have signs indicating the location of the dedicated E10-or-lower fuel pump. There would be no minimum-fuel-purchase requirement at that pump.

The AMA can only imagine how many motorists and motorcyclists will be lining up at that single pump to get E10-or-lower fuel.

Furthermore, a survey by the National Marine Manufacturers Association found 35 percent of the retailers in non-compliance with the current labeling requirements. The AMA believes that enforcement will be more difficult with more labels and pumps.

The AMA does not believe this new misfueling mitigation plan will provide clarity to our members and the general public. Another label on a blender pump that already has many labels will not suffice and could be easily overlooked. The plan calls for no physical barriers in the fueling nozzle/receptacle as was provided for when the nation went from leaded to unleaded fuel. History tells us that, even with these physical barriers in place, misfueling still occurred.

Retailers who want to sell E15 also have the option of having a dedicated E15 pump or hose, or a pump that dispenses E15 and higher ethanol blends through a single hose. If a blender pump dispenses multiple fuels that include E15 and higher ethanol blends, the EPA may require a minimum purchase requirement.

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Last year, the AMA told the EPA that with E15 now coming into the market, our members who make a concerted effort to fuel their motorcycles or ATVs with E10-or-less fuel, may unknowingly refuel with residual E15 left in a blender-pump hose. A blender pump dispenses different fuel blends through the same hose, such as E10 and E15. When a customer buys E15, as much as a third of a gallon of residual E15 is left in the hose, which can inadvertently get into the next customer's vehicle while fueling with E10.

The REAP grant and loan program to purchase special ethanol blender pumps will only worsen the possibility of misfueling by consumers.

Thank you for the opportunity to provide comments on this important issue.

Sincerely,



Wayne Allard
Vice President, Government Relations