April 25 2019

Thank you Frank.

The American Motorcyclist Association is a nonprofit organization that was founded in 1924 and has grown to more than 213,000 members. Our mission is to promote the motorcycle lifestyle and protect the future of motorcycling.

We urge the U.S. Environmental Protection Agency not to allow gasoline blended with up to 15 percent ethanol to take advantage of the 1-psi Reid Vapor Pressure waiver which in turn allows the year-round sales of this blended fuel. This action would greatly increase the risk of inadvertent misfueling by motorcyclists and all-terrain vehicle owners.

None of the estimated 22 million motorcycles and all-terrain vehicles in use in the United States are approved by the EPA to operate on ethanol blends higher than 10 percent. Using higher ethanol blends in those vehicles is illegal and may cause engine and fuel system damage in addition to voiding the manufacturer’s warranty. In addition the AMA is concerned that expanding the sale of E15 fuel to year round will significantly decrease the availability of fuels needed for motorcycles and other small engines.

Lastly and perhaps most important for addressing concerns about misfueling would be a consumer education campaign that has so far been lacking from the rush to expand the market for E15. With the introduction of the deceptive marketing label “Unleaded 88” for E15, this need has only grown. We urge the EPA to at least initiate a consumer awareness campaign to ensure that consumers have adequate information on this issue.

The EPA has made it illegal for motorcyclists and ATV owners to use E15 fuel and yet seems to have little interest in the misfueling issue or, at least, in conducting a public consumer awareness campaign to safeguard the public. It seems the EPA’s proposed rule does not consider the concerns of motorcyclists and ATV owners.

Therefore, the AMA urges the EPA not to extend the 1-psi Reid Vapor Pressure waiver to E15 fuel in order to avoid severe economic harm to the millions of motorcyclists and ATV owners in the United States.