

Roshan Saxena

Dear Chair and Board Members,

My name is Roshan Saxena. I am a student in Santa Clara County, help lead the FUHSD Climate Collective, and serve as a youth member of the Santa Clara County Sustainability Commission. I am submitting this comment in my personal capacity.

Thank you to the Board and staff for the technical work behind these proposed amendments. Establishing fuel standards involves decisions that most drivers will never see, but that matter to the quality of the air we breathe and the reliability of the fuel we buy. I appreciate the effort to establish clear requirements for E15 while preserving consumer choice.

My main concern is how the proposed flexibility for blending E15 at retail locations will work in practice. As the Board considers allowing retailers to produce E15 by adding ethanol or blending E85 with E10, I encourage staff to clearly explain how responsibility for the finished fuel's compliance will be assigned and verified. Retailers should understand what testing and records are required, and enforcement staff should be able to trace a fuel-quality problem to its source. If existing requirements already address these questions, a clear explanation in the final rulemaking materials would be helpful.

I also appreciate that the proposal allows E15 to be offered alongside E10 rather than requiring all gasoline to become E15. That distinction matters for people using vehicles and equipment that cannot use E15. As implementation proceeds, I encourage CARB to coordinate with the agencies responsible for fuel labeling and retail oversight so that drivers encounter clear, consistent compatibility information before selecting a fuel. A young or first-time driver should not need to understand fuel regulations to avoid making an expensive mistake.

Finally, I hope CARB will clearly distinguish the effects of these amendments from the effects of AB 30, which already authorized E15 sales. Explaining what this rule changes, what protections remain in place, and how compliance will be checked would help the public understand the Board's decision. It would also make the substantial work behind the proposal easier to evaluate.

Thank you again for your careful work and for considering public input as you finalize these standards. I appreciate the opportunity to contribute a student perspective on how the regulations will be understood and experienced by California drivers.

Roshan Saxena