October 15, 2024

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Low Carbon Fuel Standard Amendments issued October 1, 2024

Dear Chairperson Randolph,

EcoEngineers is a consulting, auditing, and advisory firm with an exclusive focus on the energy transition. The firm was established in 2009 to steer low-carbon fuel producers through the complexities of emerging energy regulations in the United States. Today, EcoEngineers' global team is shaping the response to climate change by advising businesses across the energy transition. EcoEngineers appreciates the opportunity to comment on the proposed LCFS amendments issued October 1, 2024.

EcoEngineers' team of scientists, engineers, and auditors are honored to have served as an accredited verification body since the inception of the LCFS third-party verification program. In response to the proposed 2024 LCFS Amendments and comments submitted by other verification bodies, we are writing to convey our views on the firm rotation topic. The existing regulations within the LCFS verification program stipulate a mandatory rotation of audit firms every six years to assess participants' carbon intensity (CI) and fuel quantities compliance. Our request is that CARB amend the mandatory firm rotation regulation to include an exception for American National Standards Institute (ANSI) National Accreditation Board (ANAB) verification bodies. Of the 30 approved LCFS verification bodies, there are at least six verification bodies accredited by ANAB.

EcoEngineers has been granted accreditation by ANAB in accordance with the following International Organization for Standardization (ISO) standards ISO/IEC 17029:2019 Conformity assessment — General principles and requirements for validation and verification bodies; ISO 14065:2020 — General principles and requirements for bodies validating and verifying environmental information; and ISO 14064-3:2019 Greenhouse gases (GHG) — Part 3: Specification with guidance for the verification and validation of greenhouse gas statements. The specific scope of accreditation granted to EcoEngineers is the Verification of assertions related to GHG emission reductions and removals at the project level for project activities under ANAB scope 01- GHG emission reductions from fuel combustion and verification of applications and reports under the Canadian Clean Fuel Regulations, Sector 2 – Renewable/Bio/Low-CI Fuels.

This accreditation allows EcoEngineers to provide organizations and their stakeholders, including board members and investors, with the assurance, credibility, quality, rigor, and continuous improvement they need to reduce risk. Additionally, this assurance will support a GHG project's ability to substantiate its GHG statements. EcoEngineers joins an elite group of ANAB accredited Validation and Verification Bodies (VVBs) that identify

risks, review methods of data collection and reporting, and evaluate the robustness of data management systems in place to ensure accurate and transparent GHG reporting.

We assert that this accreditation, in conjunction with our LCFS verification body status, exceeds the standards in place for verification bodies and CPA firms as we are subject to additional oversight on GHG verification practices through the annual office and witness assessments conducted by ANAB-certified assessors to maintain accreditation status. Considering the rigorous quality standards and oversight we are bound to by ANAB, we propose that firms who hold this accreditation should not be subject to the six-year verification body rotation. Our standard practice is to rotate lead verifiers assigned to each verification project to ensure biases cannot form. **We recommend that those exempt from company rotation, are instead required to rotate the lead verifier assigned to each project at least every six years.**

EcoEngineers is subject to a third-party annual attest engagement (agreed-upon procedures) performed by a CPA Firm to evaluate EcoEngineers' compliance with EPA's Renewal Fuel Standard (RFS) Quality Assurance Plan (QAP) program regulations. The annual attest report compares the list of compliance reports submitted to EPA during the compliance period to the RFS regulation reporting requirements and checking EcoEngineers verification reports covered by approved QAP under the regulation.

Additionally, as stated in previous comments, EcoEngineers has concerns regarding CARB's proposed approach to regulating the following topics under the proposed amendments: the 20% limit for soy and canola renewable diesel/biodiesel-based fuels, the proposed sustainability requirements for biomass, and the approach to determining land use change risks.

EcoEngineers is concerned with the ability of pathway holders to meet the proposed sustainability requirements without additional details on what is needed to demonstrate compliance. There could be an immense administrative and economic burden due to certification requirements that many producers may be unable to satisfy. As an accredited LCFS auditor, we have first-hand experience that clarity in compliance requirements is of utmost importance as we attempt to retrieve and review all necessary documentation during a verification.

EcoEngineers also requests clarification on the definition of regions with "higher LUC risk." Since GTAP geographical levels are based on 18 agro-ecological zones (AEZs), EcoEngineers requests clarification on which AEZs and counties are considered higher LUC risk. This will ensure consistency across ILUC estimates.

Finally, as biomass-based feedstocks are the most feasible solution to decarbonizing transportation (on-road, aerial, and marine) in the short and medium term, EcoEngineers objects to the 20% cap on soy, canola and sunflower renewable diesel/biodiesel-based fuels.

Instead of setting a cap on two of the most successful feedstocks and creating additional administrative burdens for producers, EcoEngineers recommends CARB convene a committee dedicated to addressing how the energy in purposely grown feedstock can be harnessed ecologically. Emissions from land-use change, impact on food and feed markets, and a commitment to biodiversity and sustainability should be studied to understand how to cultivate low-carbon feedstock for fuel. This committee can provide recommendations for how these necessary fuels can be produced in the most sustainable, ecologically sound manner.

EcoEngineers would like to thank CARB for its time and consideration of our comments. Please let us know if you have any questions.

Sincerely,

Shashi Menon
CEO