

**UPLOADED VIA AFP**

December 9, 2025

Guo Yu  
Manager, Fuel Evaluation Section  
Transportation Fuels Branch, Industrial Strategies Division  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Public Comments - Tier 2 Pathway Application No. B0827**

To Whom It May Concern,

Martinez Renewables LLC (MRLLC) is encouraged by the interest in Pathway Application B0827 and appreciates the opportunity to provide this response to the public comments on the application.

Public comments were submitted during the public comment period for MRLLC Tier 2 Pathway for Renewable Fuels for use as transportation fuel in vehicles in California. Pursuant to Section 95488.7(d)(5)(A): "Only comments related to potential factual or methodological errors will require responses from the fuel pathway applicant." Accordingly, revisions to the fuel pathway application are not necessary or required. However, as a participant in the Low Carbon Fuel Standard (LCFS) program, MRLLC wishes to address the comments received regarding its pathway application.

The comments are addressed below. MRLLC's position is that no revisions to the fuel pathway application B0827 are needed. We appreciate the opportunity to respond to these comments and respectfully request that CARB certify the pathway pursuant to Section 95488.7(d)(5)(B).

**Responses to Public Comments**

**1. Fr. John Fernandes**

MRLLC appreciates the support for environmental stewardship.

**2. Rich Field (PCEC)**

MRLLC's application includes a comprehensive Life Cycle Analysis (LCA) using the CARB GREET model, which accounts for all relevant GHG emissions, including those from feedstock pre-treatment, transportation (truck, rail, ocean tanker), and facility operations. The cumulative emissions, both in-state and out-of-state, are documented in the application and verified by a third-party verifier. The benefits of the LCFS program in addressing global climate change are recognized by CARB and are reflected in the program's design. Comparative analyses of California's LCFS and global emissions are outside the scope of individual pathway applications but are addressed in CARB's programmatic assessments.



**3. Life Cycle Associates (Stefan Unnasch)**

MRLLC appreciates the constructive feedback and supports the development of future guidance to facilitate consistent documentation for global feedstock processors. The published pathway and supporting documentation comply with current LCFS requirements.

**4. Biofuelwatch (Gary Hughes)**

Martinez Renewables LLC (MRLLC) ensures that all feedstocks used in the pathway are fully traceable to their points of origin, with sourcing and documentation subject to independent third-party verification.

Information designated as business confidential is handled in accordance with Section 95488.8(c) of the LCFS regulation. All confidential data submitted in support of the application has been reviewed by both CARB staff and the third-party verifier, ensuring regulatory compliance and protection of sensitive business information.

Feedstock procurement for MRLLC is conducted in accordance with all applicable LCFS regulations. Sourcing decisions are made with careful consideration of supplier vetting and sustainability evaluation, as well as regulatory standards and market practices. All procurement activities are subject to ongoing review to ensure compliance and transparency.

All feedstock sources for MRLLC are subject to a comprehensive monitoring plan, which includes maintaining records of origin, volume, and transportation. Any irregularities identified in the supply chain are investigated, and notifications are made to CARB as required by regulation.

The life cycle analysis for MRLLC's pathway application applies the carbon intensity and indirect land use change (ILUC) values established by CARB. For the feedstocks used in this application, the designated ILUC values are consistent with CARB methodology and are transparently documented in the application materials.

The entities associated with this application are fully disclosed, and the facility does not utilize Palm Fatty Acid Distillate (PFAD). MRLLC is committed to transparency in its operations and ensures that all relevant parties are appropriately identified in accordance with LCFS program requirements.

**Summary**

MRLLC is thankful for the opportunity to address the commenters for their interest in this project. The pathway application has been reviewed by an independent third-party verification body approved by CARB and conforms to all LCFS regulations. MRLLC contends that no changes to the pending pathway application under CARB review are required and see no reason to deny or stay a certification decision on this pathway.

Sincerely,



12/9/25

Andrew Siekmann  
Supply & Value Chain Optimization Manager