

April 13, 2026

Lauren Sanchez
Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted Electronically via CARB Internet Comment Form and Email: climatedisclosure@arb.ca.gov

Re: Timing of Response to CARB's March 23 Workshop: California Corporate Greenhouse Gas Reporting Program

Dear Chair Sanchez:

The undersigned organizations write regarding the California Air Resources Board's ("CARB") request for feedback on topics raised during its March 23, 2026, public workshop (the "March Workshop") concerning the development of regulations to implement Senate Bill 253 (as amended and codified in Health & Safety Code § 38532, "SB 253").

On April 3, 2026, the Society for Corporate Governance (the "Society"), joined by the Bank Policy Institute ("BPI"), submitted a letter to CARB expressing concern regarding the April 13 deadline for public comments on the March Workshop and requesting confirmation that CARB will meaningfully consider substantive input submitted after the deadline if it is not significantly extended. We support and join that request and submit this letter to reflect the shared views of the undersigned organizations. A copy of that letter is attached for reference.

The undersigned organizations represent a broad cross-section of companies and stakeholders that are actively engaged in greenhouse gas accounting, disclosure, and assurance practices, including entities with demonstrated leadership in emissions accounting and public disclosure.¹ Across our respective memberships, there is a shared view that CARB's three-week comment period does not provide sufficient time to gather and prepare robust input on the important, complex, and highly technical topics presented at the March Workshop.

As reflected in the Society and BPI letter, the issues raised—including Scope 1, Scope 2, and Scope 3 reporting approaches, accounting methodologies, assurance frameworks, and cost considerations—are not only complex but also central to CARB's ability to implement SB 253 in a manner that is interoperable and not unnecessarily burdensome, consistent with statutory requirements.

Accordingly, for reasons including the above and those set forth in the Society and BPI letter, we respectfully request CARB's express written confirmation that it will review and meaningfully consider stakeholder input submitted on or before June 1, prior to initiating the formal rulemaking process referenced during the March Workshop.

We note that CARB updated its website on April 6 to state that "informal comments will be received until June 1." However, it is unclear what is meant by "informal comments," whether and how such comments will be considered, or whether they will be incorporated into the rulemaking process. In the absence of clear confirmation, stakeholders remain concerned that input submitted after April 13 may not be fully considered prior to the initiation of formal rulemaking.

¹ "In developing the regulations required pursuant to [SB 253], [CARB] shall consult with [...] [r]eporting entities that have demonstrated leadership in full-scope greenhouse gas emissions accounting and public disclosure and greenhouse gas emissions reductions." See CA Health & Safety Code § 38532(c)(5).

We appreciate CARB's ongoing engagement with stakeholders and would welcome the opportunity to further discuss these issues.

Respectfully submitted,

Society for Corporate Governance
Bank Policy Institute
California Bankers Association
California Retailers Association
California Water Association
Securities Industry and Financial Markets Association



April 3, 2026

Lauren Sanchez
Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted Electronically via CARB Internet Comment Form and Email: climatedisclosure@arb.ca.gov

Re: Timing of Response to CARB's Proposed Rulemaking to Implement the California Corporate Greenhouse Gas Reporting Program

Dear Chair Sanchez:

The Society for Corporate Governance ("Society") submits this letter in response to the California Air Resources Board's ("CARB") request for feedback on topics raised during its March 23, 2026, public workshop (the "March Workshop") regarding the development of regulations to implement Senate Bill 253 (as amended and codified in Health & Safety Code § 38532, "SB 253"). This letter expresses our concern regarding CARB's April 13 deadline for public comments on the March Workshop and requests confirmation that CARB will meaningfully consider substantive input submitted after the deadline if it is not significantly extended.

CARB has provided public stakeholders just three weeks to prepare and submit comments on the wide range of topics and related proposals, requests, and questions, many of which are highly technical and data-intensive, presented at the March Workshop.¹ These include the approach for setting organizational boundaries for greenhouse gas ("GHG") emissions reporting, adjustments to Scope 1 and 2 GHG emissions reporting (including mandatory use of CARB-specific Scope 1 and 2 reporting templates),² regulatory options for Scope 3 GHG emissions reporting, GHG accounting methods, assurance engagements, and companies' estimated costs for compliance as compared to CARB's estimates included in its presentation slides. Based on the scope of the topics, proposals, requests, and questions, three weeks does not provide sufficient time for companies to conduct the information gathering and analysis necessary to prepare thoughtful and constructive responses to CARB.

As outlined in the Society's prior letters to CARB,³ there are significant variations in practice across organizations on GHG emissions accounting, disclosure, and assurance. The Society intends to provide

¹ See CARB's March Workshop [Slides](#) at p. 40.

² The Society has previously expressed concerns about the mandatory use of reporting templates due to, among other factors, deviations from the Greenhouse Gas Protocol and confidentiality and privacy concerns. See Society [Comment Letter](#) in Response to Draft Reporting Template for Scope 1 and Scope 2 GHG Emissions and [Appendix A](#) (November 2025).

³ The Society has engaged with CARB's proposals in prior submissions, including:

- Society [Comment Letter](#): Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation (February 2026).
- Society [Comment Letter](#) in Response to Draft Reporting Template for Scope 1 and Scope 2 GHG Emissions and [Appendix A](#) (November 2025).
- Society [Letter](#) to CARB in Response to Request for Comments Following August 21, 2025 Public Workshop (September 2025).
- Society [Letter](#) to CARB: Feedback on August 21, 2025 Public Workshop (August 2025).
- Society [Recommendations](#) for CARB's Consideration for August 21, 2025, Public Workshop, "[Doing Business in California](#)" [Decision Trees](#) and [Enforcement Relief Table](#) (August 2025).
- Society [Comment Letter](#): Information Solicitation to Inform Implementation of California Climate-Disclosure Legislation: Senate Bills 253 and 261, as amended by Senate Bill 219 (March 2025).

substantive feedback regarding CARB's proposals on these topics based on the experience of its members, including members whose companies have demonstrated leadership in emissions accounting and public disclosure.⁴ However, as a practical matter, the Society will not be able to solicit and assess feedback from its members on CARB's proposals, questions, and request for cost estimates by April 13, 2026.

CARB's proposals, questions, and requests for cost estimates are not just complicated, they are also critically important to CARB's ability to meet its statutory mandates. CARB's regulatory approach with respect to each of the topics covered in the March Workshop will have significant implications for the compliance complexity, cost, and capacity of reporting entities and their assurance providers. Under SB 253, CARB needs to carefully consider, among other things, the interoperability of SB 253 reporting with reporting practices developed in alignment with other frameworks or standards, including the Greenhouse Gas Protocol.⁵ As required under SB 253, CARB must ensure that its emissions reporting requirements "minimize[] duplication of effort", and promote interoperability by allowing reporting entities to submit reports prepared to meet other national and international reporting requirements.⁶ CARB's approach should leverage established frameworks and practices where appropriate.

Therefore, to (1) meet its mandate under SB 253, (2) account for the practical realities of reporting companies and their assurance providers, and (3) reduce the unnecessary regulatory burden on entities consistent with California's Administrative Procedure Act,⁷ it is essential for CARB to receive comprehensive and well-informed data from reporting entities on their GHG accounting, disclosure, and assurance practices, and to meaningfully consider that feedback in CARB's rulemaking.

Accordingly, with respect to the proposals, questions, and requests presented at the March Workshop, the Society and the Bank Policy Institute ("BPI") respectfully request CARB's prompt written confirmation that it will review and meaningfully consider any substantive response submitted by the Society and/or BPI on or before Monday, June 1, 2026, prior to initiating formal rulemaking.⁸

As always, we welcome the opportunity to further discuss our request with CARB.

⁴ "In developing the regulations required pursuant to [SB 253], [CARB] shall consult with [...] [r]eporting entities that have demonstrated leadership in full-scope greenhouse gas emissions accounting and public disclosure and greenhouse gas emissions reductions. See CA Health & Safety Code § 38532(c)(5).

⁵ See CA Health & Safety Code § 38532(c)(2)(A)(ii).

⁶ See CA Health & Safety Code § 38532(c)(2)(D)(i).

⁷ See CA Government Code § 11340.1(a).

⁸ "Formal rulemaking" has the same meaning as the term used in CARB's March Workshop [Slides](#) at p. 9. We note that the Society provided substantive comments on, and met with CARB staff regarding, the proposed Climate Data and Financial Risk Reporting Regulation ("Initial Regulation"), including on the approach and timing of reporting under SB 253, proposed fee structure and timing, and other topics. The Initial Regulation was adopted largely as proposed, without addressing the Society's comments and recommendations. As a result, we are concerned that any comments we provide following the initiation of CARB's formal rulemaking process will not be taken into account in CARB's final regulations.

Respectfully submitted,



Randi Val Morrison
General Counsel & Chief Knowledge Officer
Society for Corporate Governance



Paul F. Washington
President & Chief Executive Officer
Society for Corporate Governance

We join the Society in expressing our concern regarding CARB's April 13 deadline for public comments and in requesting confirmation that CARB will meaningfully consider substantive input submitted after the deadline if it is not significantly extended as set forth above.

Respectfully Submitted,

/s/ Sam Riley

Sam Riley
Head of International Regulatory Policy, Senior Vice President and Senior Associate GC
Bank Policy Institute



The Bank Policy Institute (BPI) is a nonpartisan public policy, research and advocacy group, representing the nation's leading banks and their customers. Our members include universal banks, regional banks and the major foreign banks doing business in the United States. Collectively, they employ nearly 2 million Americans, make nearly half of the nation's small business loans and are an engine for financial innovation and economic growth.