



February 9, 2026

Sydney Vergis, Ph.D., Assistant Division Chief
Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation

Dr. Vergis and CARB staff,

The Climate Registry (TCR) appreciates the opportunity to provide comments on the Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation. The Climate Registry is a leader in credible greenhouse gas (GHG) reporting and disclosure. Founded in 2007 by 63 North American states, provinces, and territories to scale up the work of the California Climate Action Registry (created by California legislation in 2001), TCR brings more than two decades of expertise in preparing states and reporters for GHG regulation. This combination of technical rigor, capacity building support, and public disclosure is unmatched among GHG registries.

TCR strongly supports the California Air Resources Board's (CARB) ongoing efforts to develop and implement the Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure programs, as mandated by SB 253 and SB 261. We view the proposed initial regulation as a foundational milestone in establishing a transparent and robust climate reporting system in California. CARB's proposed fee structure is an appropriate mechanism to recover the reasonable costs of implementing and administering the SB 253 and SB 261 programs. Adequate and stable funding is essential to support program integrity, data quality, and consistent administration over time.

TCR commends CARB's steady progress and underscores the importance of maintaining this momentum. Consistent progress in these early stages will ensure the long-term scalability and efficacy of the programs. We are encouraged by this forward movement and support the continued efforts to efficiently and effectively establish these programs.

TCR values CARB's ongoing consideration of stakeholder feedback throughout this process. We look forward to staying engaged as additional portions of the regulations are developed and welcome opportunities to share additional insights from TCR's expansive experience in GHG reporting and disclosure.

Sincerely,

Amy Holm
Executive Director
The Climate Registry