Manufacturers Council of the Central Valley (Maryn Pitt)

February 8, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Public Comment on Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation

Dear Chair Sanchez and Members of the California Air Resources Board:

On behalf of manufacturers operating in the San Joaquin Valley and the members of the Manufacturers Council of the Central Valley (MCCV), we respectfully submit the following comments regarding the California Air Resources Board's (CARB) Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation.

Manufacturing is a cornerstone of the San Joaquin Valley economy, providing tens of thousands of direct jobs, supporting critical supply chains, and sustaining many disadvantaged and rural communities. MCCV members and Valley manufacturers are committed to improving environmental performance and have long partnered with state and local agencies to reduce emissions, increase efficiency, and comply with California's extensive environmental regulatory framework. However, the proposed regulations implementing the corporate greenhouse gas reporting and climate-related financial risk disclosure statutes raise serious concerns regarding feasibility, cost, and unintended economic consequences for manufacturers in the San Joaquin Valley.

Disproportionate Burden on Manufacturing

The proposed regulations would impose significant new reporting, verification, and compliance obligations that are particularly burdensome for manufacturers with complex operations, energy-intensive processes, and extended supply chains. Many San Joaquin Valley manufacturers operate on thin margins and face intense domestic and international competition. The cumulative cost of data collection, third-party assurance, legal review, and ongoing compliance would divert limited capital away from investments in actual emission reductions, modernization, and workforce development.

Many Valley manufacturers are mid-sized or family-owned enterprises that lack the internal resources to manage these requirements. The proposed one-size-fits-all framework fails to adequately account for these differences and risks accelerating consolidation or relocation of manufacturing activity out of California.

Supply Chain and Scope 3 Challenges

The proposed Scope 3 emissions reporting requirements present particularly acute challenges for manufacturers in the San Joaquin Valley. Manufacturers rely on global, national, and regional supply chains that include small businesses, agricultural producers, and vendors with limited capacity to collect or provide emissions data. The proposed regulations effectively compel manufacturers to obtain, estimate, or assume liability for data over which they have little control, creating significant uncertainty and exposure to enforcement risk.

These requirements are likely to strain supplier relationships, increase procurement costs, and disadvantage California-based manufacturers relative to out-of-state and international competitors that are not subject to comparable mandates.

Economic Impacts on Disadvantaged Communities

The San Joaquin Valley includes many communities already facing economic challenges. Manufacturing jobs in the Valley are often well-paying, provide benefits, and do not require advanced degrees. Regulatory costs that reduce competitiveness or discourage investment directly threaten these jobs and undermine broader state goals related to equity, economic development, and community stability.

At a time when the state is seeking to expand domestic manufacturing, strengthen supply chain resilience, and grow clean technology industries, the proposed regulations risk producing the opposite effect by discouraging in-state manufacturing investment.

Need for Phasing, Flexibility, and Alignment

We respectfully urge CARB to reconsider the scope, timing, and structure of the proposed regulations, including:

- Meaningful phase-in periods that reflect operational realities;
- Safe harbors and liability protections, particularly for Scope 3 disclosures;
- Greater alignment with federal requirements and international standards to avoid duplicative and conflicting obligations; and
- Clear recognition of existing environmental reporting and compliance programs to prevent redundancy.

Without these adjustments, the proposed regulations will function less as a transparency tool and more as a punitive compliance regime that disproportionately harms manufacturers in regions like the San Joaquin Valley.

Conclusion

Manufacturers in the San Joaquin Valley, including our MCCV members support reasonable, workable policies that advance environmental objectives while preserving economic vitality and jobs. We respectfully request that CARB substantially revise the proposed regulations to ensure they are legally sound, economically feasible, and aligned with California's broader manufacturing, equity, and climate goals.

Thank you for the opportunity to comment and for your consideration of these concerns.

Sincerely,

Maryn Pitt

Maryn Pitt
Policy Director
Manufacturers Council of the Central Valley

CC: San Joaquin Valley Air Pollution Control District
State Senator Marie Alvarado –Gil
State Senator Anna Caballero
State Senator Jerry McNerney
Assemblymember Juan Alanis
Assemblymember Esmerelda Soria
Assemblymember Rhodesia Ransom
Assemblymember Heath Flora