

February 10, 2025

Re: Public Comments to California Climate-Disclosure Information Solicitation

Legislation: Senate Bills 253 and 261, as amended by SB 219

Dear California Air Resources Board,

As a youth-led organization, Sunrise Bay Area is deeply concerned about the ever-worsening climate crisis and its effects on our communities and future. We feel these effects deeply here in California, where raging wildfires, erratic storms, and persistent drought serve as the consistent backdrop of our lives.

On behalf of Sunrise Bay Area, thank you for this opportunity to comment on SB 253 and SB 261 – important legislation requiring businesses to disclose climate-related risks and greenhouse gas emissions. These critical pieces of law are essential steps in pursuing environmental justice, another core tenet of our organization's work. As you implement these laws, we urge you to collect data on specified GHG emissions that would be helpful in identifying harmful impacts to underserved communities and communities of color who have historically borne the brunt of corporate pollution. This could include increased temporal and spatial data granularity to understand how GHG pollutants affect the health of local communities.

Additionally, we urge you to expand the definition of GHG to include harmful gases that may not be traditionally thought of as greenhouse gases but are still emitted pollutants that cause severe health consequences. For example, nitrous oxide (N₂O) is a greenhouse gas with anthropogenic sources. But other nitrogen oxides (NO_x) can also cause serious health issues. Nitrogen dioxide (NO₂) is not commonly considered a greenhouse gas but still damages human respiratory systems and causes acid rain. It is a common co-pollutant from combustion sources and should be reported all the same due its deleterious effects.

We also urge you to utilize the broadest definition of “doing business in California” as possible, such as the definition in 23101a of “actively engaging in any transaction for the purpose of financial or pecuniary gain or profit.” Given that the scope of SB 253 is already limited to businesses that intake \$1 billion in annual revenue, these corporations are large enough to invest the time and resources into reporting these important data. These large businesses rely on the natural resources and skilled communities of our state for the success of their business. We need to hold polluters responsible for the emissions burdens they put on these same communities and ecosystems. With this, we also believe that federal and state government entities should be included in the definition of a “business entity” as well as any entities that are owned in part or wholly owned by foreign governments.

We strongly urge CARB to uphold these critical environmental justice aspects during SB 253 and SB 261 implementation. While reporting and disclosure are important first steps in the ultimate goal of reducing emissions, we believe that doing so through an environmental justice lens lays the foundational groundwork for holding polluters responsible and ensuring the health and safety of our communities.

Sincerely,
Sunrise Bay Area

