



March 20, 2025

The Honorable Liane Randolph
Chair, California Air Resources Board
1011 I Street
Sacramento, CA 95814

RE: NextGen California Comments on Information Solicitation for Implementation of SB 253 and 261

Dear Chair Randolph,

NextGen California writes to express our strong support for CARB to implement SB 253 and SB 261 in a timely and comprehensive manner – specifically, the need to adhere to the updated timeline outlined in SB 219 (Wiener). California must not delay implementation of these two new statutes that are designed to increase corporate transparency and disclosure of their greenhouse gas emissions. We appreciate the leadership shown by the CARB team thus far and the undertaking required to draft the regulations needed to implement these two new laws. We believe that doing so expeditiously will accelerate the state's decarbonization efforts and help put us on a path to meet our climate goals.

These new laws are pivotal for the public and company stakeholders to hold corporations accountable for their greenhouse gas emissions and climate-related financial risks. As we have seen with the recent wildfires in Southern California, pollution reduction, climate risk disclosure, and related preparations to mitigate those risks can save lives. **It is now more important than ever for companies to disclose their greenhouse gas emissions and climate-related financial risks to mitigate the worst effects of climate change.**

Timely implementation of SB 253 and 261 is key to upholding and promoting the national and international standards on climate risk transparency. Given various federal actions, the United States is threatened by a series of environmental protection rollbacks. As a result, it is even more important for California to stay on track with our decarbonization goals and champion greenhouse gas emission accountability and climate risk disclosure. The passage of this legislation sends a clear message about the need for corporate emissions and climate risk disclosure data to hold the biggest polluters accountable in the fight to meet our decarbonization goals. The timely and comprehensive implementation of these laws also sets a precedent for other governments across the country and world to follow. **We commend CARB's efforts to develop clear guidance and regulatory certainty per the criteria set forth in these laws to ensure covered entities can comply in the most feasible manner.**



NextGen California echoes priorities detailed by fellow environmental advocates to require (1) full scope emissions reporting including Scope 1, 2, and 3 emissions disclosure, (2) the adoption of existing widely used reporting standards such as the TCFD recommendations and GHG Protocol, and (3) the public disclosure of GHG emissions data and climate risk information.

In response to specific questions shared in the RFI, NextGen California supports the adoption of regulations as intended by the bill language and bill authors.

We thank you for the opportunity to provide comments on SB 253 and 261. Please reach out to us with any questions or comments.

Sincerely,

Chloe Ames
Policy Advisor, NextGen California