

April 13, 2026

To: California Air Resources Board

From: Muriel Strand, P.E.

Re: Comments on regulations pursuant to SB253 outlined in the March workshop

While reporting pursuant to SB253 may not initially be in a form useful to consumers and investors, planning ahead for reporting formats and descriptions that serve, and can be made understandable for, the general public will maximize the effectiveness of SB253. Consumers in particular will need their hands held.

Setting Organizational Boundaries seems like it could get complicated from the perspective of avoiding both double-counting and missing emissions. Will entities have to choose one approach for all their reporting or will they be able to mix and match? The latter seems more conducive to errors.

The list of **Proposed Scope 3 Categories** lacks clarity. It is not obvious what specific emitting processes are included in:

Goods and Services

Waste generated in operations

Leased assets

Processing of sold products

Franchises

Investments

Ideally, CARB staff have a complete understanding of all emitting processes involved in specific industries and businesses so as to notice what may be missing.

GHG Accounting Methods are clearly crucial. Obviously, well-calibrated physical measures are preferable. Spend-based methods should have regulatory guard rails, since prices and price levels can be expected to vary substantially even when the underlying processes and emissions do not. All spend-based estimates should be tied to the date/s on which they are based so as to ensure accuracy and traceability. Such timing specifications can be expected to support recalculation in the future so reports can be consistent and comparable across sectors.

CARB staff should anticipate problems that may arise with hybrid methods and structure regulations to avoid such reporting traps.

Proposed Emission Factor Datasets should ideally be consistent with each other. Obviously, well-calibrated physical data are best. Proprietary calculations should be suspect; perhaps non-disclosure agreements can reveal and protect commercially important data and algorithms.

Accounting Methods that involve summing results from many activities and sectors may result in accumulating small uncertainties into large deviations between actual and calculated emissions. Are there reconciliation methods that can improve overall accuracy and precision?

Options for Phase-In that focus on high-emitting categories seem sensible. Reporting broadly all emitting activities could be hybridized by prioritizing attention to the key sectors and/or categories listed in slides 26 and 27. Less important and de minimis activities could simply be listed initially and revisited later, as information and time allow. With respect to Sectoral Phase-In, the Residential and Agriculture Sectors merit close attention as they pertain to survival needs. And within those Sectors, the list of Categories may guide reporting priorities.

The listed **Assurance Standards** were easily found by simple internet searches except the AICPA standard. Apparently the ISSA standard includes more detailed guidance relative to ESG; evaluation and indicators for E, S and G should **always** be conducted and reported independently of the other two.