

April 14, 2022

Gary Gensler
Chairman
Attention: File Number S7-10-22
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549

Dear Chairman Gensler,

The undersigned organizations appreciate this opportunity to comment on the Securities and Exchange Commission's (SEC) [proposed climate-risk disclosure requirements](#) (proposal). We represent banks, commercial and multifamily real estate owners, operators, investors, lenders, developers, hospitality/resorts, agents, and service providers.

We appreciate the significant amount of time and effort the SEC has put into developing these proposed requirements. In order to respond in a thoughtful and comprehensive manner, however, we respectfully request the SEC extend the comment deadline by 30 days.

With the proposal spanning over 500 pages and posing 201 questions, we believe that a 60 day comment period does not provide adequate time to respond in a sufficiently robust manner. For example, understanding the application of GHG Scope 1, Scope 2, and Scope 3 emissions calculations to the financial services sector is particularly complicated and time-consuming. In order to provide a helpful response, we will need more time to examine the Scope 3 emissions category, better understand important nuances, and communicate key questions and/or findings with the SEC.

We would very much appreciate an additional 30 days to develop and submit our response for a total comment period of 90 days. Please contact Sairah Burki, Managing Director, Regulatory Affairs & Sustainability at the CRE Finance Council (sburki@crefc.org) with any questions.

Sincerely,

American Hotel and Lodging Association
American Resort Development Association
CCIM Institute
CRE Finance Council
Housing Policy Council
ICSC
Institute for Portfolio Alternatives

10 E 53rd St. 37th Floor, New York, NY 10022
900 7th Street NW, Suite 501, Washington, DC 20001
Tel: 202.448.0850 • www.crefc.org

Institute of Real Estate Management
Mortgage Bankers Association
National Apartment Association
National Association of REALTORS®
National Multifamily Housing Council
Nareit
Securities Industry and Financial Markets Association
Society of Industrial and Office REALTORS®
Structured Finance Association
The Real Estate Roundtable