General Comment

I encourage the Department of Labor to adopt the proposed rule, identified by RIN 1210-AC03, proposing amendments to the Investment Duties regulation under Title I of the Employee Retirement Income Security Act of 1974, as amended (ERISA), to clarify the application of ERISA's fiduciary duties of prudence and loyalty to selecting investments and investment courses of action, for the following reasons:

Retirement (ERISA) managers must be empowered to evaluate all factors that impact risk and return, including climate change, which affects nearly every sector of the economy. I am glad to see the Proposed Rule restores fiduciary authority to consider all relevant, financially material factors.

ESG funds have competitive returns compared to the broader market and lower downside risk.

Climate-aligned investing will manage risk, create new jobs, and generate new wealth.

Employees should have the option to align their retirement investments with their personal values, including investing in sustainable, climate-friendly funds.

Thank you for your consideration.