



February 25, 2026

**Submitted electronically via email to [COTB@arb.ca.gov](mailto:COTB@arb.ca.gov)**

Clerks' Office  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
Attn: Jordan Ramalingam, Chief, Climate Data and Risk Reporting Branch

**Re: Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation**

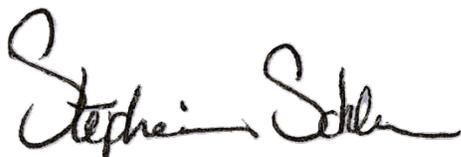
Dear Mr. Ramalingam,

The U.S. Tire Manufacturers Association (USTMA) appreciates the opportunity to provide comments on the proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation. USTMA is the national trade association for tire manufacturers that produce tires in the United States. USTMA members operate 55 facilities in 16 states, are responsible for more than 291,000 jobs, and have an annual economic footprint of \$170.6 billion. The industry supports more than 510,000 additional domestic jobs in supplier and induced activities, totaling more than 801,000 jobs nationwide. The tires from our member companies make mobility possible and keep the U.S. economy moving. USTMA advances a sustainable tire manufacturing industry through commitment to science-based public policy advocacy.

USTMA previously submitted comments to CARB on July 30, 2025. Those comments are attached for your convenience. We thank CARB for addressing our request to publicly disclose the appropriations for these climate-related programs in the proposed regulation. However, we continue to advocate for a revenue-based, tiered fee system, based on different ranges of California-specific revenue incomes of the reporting entities, rather than the proposed flat fee system tied to program costs and number of reporting entities. USTMA maintains that such a system would reasonably connect a party's fees to the extent of the party's presence and market access in California.

USTMA and its members are dedicated to making safe, efficient, and reliable tires that safely transport hundreds of millions of Americans each day. We appreciate the opportunity to provide these comments and look forward to continued dialogue with CARB. Please contact me with any questions about these comments at [SSchlea@ustires.org](mailto:SSchlea@ustires.org) or 1-202-682-4836.

Respectfully Submitted,

A handwritten signature in black ink that reads "Stephanie Schlea". The signature is written in a cursive style with a large initial 'S'.

Stephanie Schlea  
Vice President, Environment, Health, Safety, & Sustainability  
U.S. Tire Manufacturers Association