



February 3, 2026

Submitted electronically via the Public Comment Form

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

Re: Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulations – Comment from Community Health Group

Dear Chief Ramalingam:

Community Health Group (CHG) appreciates the opportunity to comment on the California Air Resources Board's proposed rule. CHG supports the Board and the Legislature's exclusion of nonprofit entities from SB 253 and SB 261 reporting to minimize administrative burdens.

CHG is an independent, not-for-profit Medi-Cal and Medicare managed care health plan serving nearly 354,000 members in San Diego County since 1982.

CHG supports the Board's efforts to establish consistent greenhouse gas reporting and climate-related financial risk disclosures for covered for-profit entities and appreciates that both the Board and the Legislature have excluded nonprofit entities to minimize their administrative burdens.

As the Board continues refining the regulation and preparing for program implementation, CHG respectfully requests consideration of a simple process that entities may use to confirm or document their exempt status under the program (e.g., through a reporting portal or a brief attestation).

CHG appreciates your consideration of these comments and looks forward to continuing to work with the Board on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Warren", with a long horizontal flourish extending to the right.

Ann Warren
Associate CEO
Community Health Group