



June 14, 2024

Janée Zakoren
Washington State Department of Ecology
300 Desmond Dr. SE
Lacey, Washington 98503

RE: Comments on Washington's proposed grant guidelines for the landfill methane emissions reduction grant

Dear Ms. Zakoren,

We appreciate the opportunity to comment on the proposed grant guidelines to assist landfill owners and operators to comply with the Landfill Methane Emissions rule (Chapter 173-408 WAC). Zero Waste Washington and Industrious Labs and our partners support the Washington State Department of Ecology's efforts to reduce emissions of methane from municipal solid waste landfills in the state. And, as noted in the grant announcement, "Ecology's most recent GHG inventory from 2019 reported methane emissions from landfills composed approximately 2% of the state's total GHG emissions that year."

This grant program provides a unique opportunity to incentivize sorely needed improvements that would result in lower methane emissions and improved community health. We applaud that the grant criteria give significant points for environmental health disparities.

We offer the following additional recommendations to design the most effective program:

- **Enhance prioritization of publicly or tribally owned landfills.** Considering the limited amount of funding, we would urge you to consider enhancing the scoring criteria so that it better accomplishes the goal of prioritizing funds to municipally or tribally owned and operated landfills, as entities that are private owners or operators in Washington are all large publicly traded companies with more revenue streams. This could be done through a separate set of points for municipally or tribally owned and operated landfills or by re-adjusting the scoring so that there is more of a gradient.
- **Promote effectiveness monitoring.** In order to achieve the rule's compliance obligations, require that awarded projects provide monitoring data must be provided in grant reporting to confirm that methane emissions have been reduced by the funded improvement.
- **Promote transparency of data.** Currently, information regarding landfill practices and actual methane mitigation results are not readily accessible to the public (it requires a public record request). Since

public tax dollars are being provided to landfills through this grant program, we encourage you to consider reasonable ways to foster better transparency. For example, as part of the grant reporting requirements, we recommend that landfills be required to provide, for posting on a website:

- Key information on the amount of funds spent,
- Mitigation improvement and the assumptions/actual data on methane emissions reduction, and
- Relevant reports that are already required by Ecology's rule or EPA's Clean Air Act regulations such as the landfill's surface emissions monitoring report and the annual report.

Thank you for consideration of our comments. We can be reached at heather@zerowastewashington.org or (206) 441-1790 and katherine@industriouslabs.org or (612) 816-4465.

Sincerely,

Heather Trim
Executive Director
Zero Waste Washington

Katherine Blauvelt
Circular Economy Director
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