



November 10, 2025

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: "Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills" Comments

Dear Chair Sanchez,

The Central California Asthma Collaborative (CCAC) thanks you for considering our comments on the proposed amendments to the Regulations on Methane Emissions from Landfills. CCAC is dedicated to protecting respiratory health and ensuring clean air for all Californians. We strongly support CARB's efforts to reduce methane emissions from municipal solid waste landfills and urge CARB to strengthen community health protections by incorporating community notification and engagement requirements into the Standardized Emissions Reduction Plan (SERP).

Children with asthma and other respiratory conditions are among the most vulnerable to air pollution. When large methane plumes are detected, they likely include other co-pollutants that can trigger asthma attacks and worsen respiratory symptoms. Communities living near landfills—disproportionately low-income communities and communities of color—deserve to know immediately when these emissions events pose a potential risk to their community. Including mandatory, timely community notifications related to landfill methane emissions would ensure that residents living within range of the plume can take health-protective actions.

Currently, the Proposed Amendments require CARB to notify landfill operators within 7 business days when a large methane plume is detected. Controlled landfills then have 5 additional days to conduct monitoring, while uncontrolled landfills have 30 days. However, **there is no requirement to notify affected communities or local air quality management districts in a timely manner.** This gap leaves residents unaware and unprotected during potential air quality hazards.

To ensure timely detection and response to emissions, the Amendments should establish a clear and consistent schedule for satellite monitoring of landfill sites. CARB's ability to identify, track, and report methane plumes in near-real time through the California Satellite Methane Project (CalSMP) provides an opportunity to set predictable monitoring intervals and to increase observation frequency when significant emissions are detected. Establishing such a schedule would strengthen accountability, improve data transparency, and ensure that both regulators and communities have reliable, up-to-date information about landfill emissions.

Given CalSMP's demonstrated capacity to frequently observe and rapidly identify methane plumes, CARB should leverage this technology to enhance transparency and community safety. CalSMP protocols for high-priority methane detections around oil and gas sites already include notification of local air districts and relevant agencies (CalOES, CalEPA, CalGem) within 48 hours, followed by community notifications within 72 hours. In fact, recent examples suggest this timeline can be further expedited to include notification of operators and communities within 24 hours of plume detection. We urge CARB to adopt a similar framework for landfill methane detections that include timely community notifications when CalSMP identifies a proximal methane plume.

Thank you for your consideration and for your continued commitment to protecting the health of Californians.

Sincerely,

Jenna Roper, PhD
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Central California Asthma Collaborative