



South Coast Air Quality Management District

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November 10, 2025

Anthy Alexiades
Short-Lived Climate Pollutant Policy Manager
California Air Resources Board

Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills (LMR)

Dear Anthy Alexiades:

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned documents. South Coast AQMD has great interest in amendments to LMR as there are over 80 active and closed landfills in our air basin. We have concerns of the process as California Air Resources Board (CARB) reached out to South Coast AQMD and other air districts that the proposed LMR was open for comments on Friday, October 31, 2025, after a single Public Workshop on December 18, 2024. We encourage CARB to greatly improve collaboration in this effort and future rule development processes to allow air districts the opportunity to share their first-hand experiences to improve rule clarity and effectiveness. Due to the breadth of proposed changes to the LMR and the limited duration for review (four business days between being notified and when comments are due), staff's comments are brief and incomplete. South Coast AQMD will continue to provide CARB with additional comments and feedback after the comment deadline.

South Coast AQMD offers the following initial key comments:

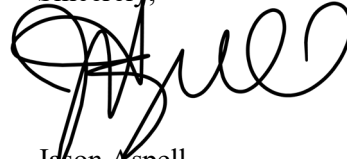
- CARB has yet to engage local air districts regarding existing LMR MOUs which will cease to apply once the proposed LMR is adopted. This creates a gap in implementation and enforcement of the proposed LMR until new MOUs are signed. South Coast AQMD previously demonstrated equivalency with existing District rules and the previous LMR, however the proposed LMR will result in additional resource impacts that have not been fully considered or analyzed by CARB.
- In general, the proposed LMR structure is unclear and inconsistent.
 - Some provisions do not contemplate further regulatory applicability when an initial requirement is not completed or is disapproved.
 - Some sections are unclear due to self-referencing requirements.
 - Some definitions and references remain from the previous regulation and are obsolete, and many new proposals and terms lack definitions.
 - There is inconsistent use of defined terms between some sections.
- The proposal imposes regulatory deadlines on CARB and/or delegated air districts to approve or disapprove permit and plan applications. Based on South Coast AQMD staff's experience with current applications for landfills, staff will not be able to comply with the proposed timelines

with current staffing and resource levels. CARB staff stated that the intent is for air districts to disapprove the application, triggering the need for a subsequent application that would re-start the timeline. This potentially never-ending loop of disapprovals and subsequent applications would result in unnecessary delays. Instead, staff suggests that CARB works closely with air districts to understand the challenges faced and add reasonable timelines in the proposed LMR.

- Installation timelines for gas control systems are arbitrary and inconsistent with previous experience with active and closed landfills. CARB should align with or defer to air districts' permitting processes for construction requirements.
- The procedures for the flow of information to and from CARB in the proposed LMR is unclear. There are many new requirements with short timeframes without regulatory language that acknowledges the actual time it takes to accomplish such tasks. Staff experience has shown that some of the timeframes in the proposed LMR are infeasible unless the language is amended.
- The cost analysis for air district resource impacts is lacking and greatly underestimates actual implementation efforts, which include permitting and enforcement activities. Lack of resource considerations for the air districts will significantly hinder the implementation and enforcement of the proposed LMR.
- The Initial Statement of Reasons (ISOR) staff report incorrectly assumes air districts have delegated authority for provisions in federal regulations related to wellhead higher operating values. Currently, U.S. EPA staff reviews and approves such requests. The proposed LMR shifts that responsibility to the air districts, adding workload without consideration of the available resources at or costs to the air districts.

South Coast AQMD will follow up with CARB to discuss further details regarding our comments on or before November 14. If you have any questions regarding this letter, please contact Senior Air Quality Engineering Manager Angela Shibata via email at ashibata@aqmd.gov or by phone at (909) 396-2737. South Coast AQMD staff appreciates increased collaboration from CARB moving forward in addition receiving communications regarding CARB's intentions for the existing LMR MOUs.

Sincerely,



Jason Aspell
Deputy Executive Officer
South Coast AQMD
Engineering and Permitting

JA:JW:AIS

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