



November 6, 2025

California Air Resources Board
1001 I Street
Sacramento, CA 95814
Email: <https://ww2.arb.ca.gov/lispub/comm/bclist.php>

Re: Methane Emissions from Municipal Solid Waste Landfills (Title 17, CCR §§ 95462 – 95475) - AMEND

To Whom It May Concern:

The California Association of REALTORS® (C.A.R.) appreciates the opportunity to comment on California Air Resources Board (CARB) proposed amendments to the Landfill Methane Regulation (LMR). C.A.R. is concerned that compliance costs could unintentionally increase housing and infrastructure costs borne by California residents already struggling to pay their rent and mortgages.

Landfills are primarily funded through local rate structures. According to the Initial Statement of Reasons and Appendix B (Economic Analysis), implementation costs on public and private landfill operators are expected to exceed \$12 million in first-year compliance cost, which is likely to be passed through to residents and businesses through higher solid-waste fees. C.A.R. urges CARB to coordinate closely with Cal Recycle and local air districts to avoid duplicative inspection and reporting requirements that could further inflate costs without providing any additional benefits to the community and respectfully requests CARB consider the following amendments prior to adoption:

1. **Clarify Cost Recovery and Implementation Schedules.** Provide direction to local air districts to ensure rate increases and fee recovery on households remain minimal through a reasonable phase-in timeline.
2. **Ensure Consistency with SB 1383 Programs.** Align data reporting and inspection intervals with CalRecycle's organic waste diversion requirements to streamline local implementation and eliminate duplication.
3. **Conduct a Residential Rate Impact Analysis.** Quantify potential effects on solid-waste collection fee increase impact on households prior final rule adoption.

C.A.R. appreciates CARB's commitment to climate leadership and respectfully requests that the above implementation considerations be addressed to avoid unintended burdens on housing costs.

Thank you for your consideration. Please contact me at kevinr@car.org if you have any questions or if we can serve as a resource to the Board.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Rodgers'.

Kevin Rodgers
Regulatory Advocate



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