



San Diego County Air Pollution Control District

November 10, 2025
California Air Resources Board
1001 I Street
Sacramento, CA 95814
Submitted via comment portal

Subject: SDAPCD Comments on Proposed Amendments to the Landfill Methane Regulation (LMR)

The San Diego County Air Pollution Control District (SDAPCD) appreciates the opportunity to provide comments on the proposed amendments to the Landfill Methane Regulation (LMR). The SDAPCD supports the California Air Resources Board's (CARB) goals to reduce methane emissions and strengthen landfill oversight. However, we are writing to express concerns regarding the rule development process, implementation, and associated resource requirements.

As the local agencies responsible for direct enforcement of LMR provisions, air districts should be actively engaged as co-regulators in rule development. While CARB staff informed districts that changes to the regulation were planned, there was no opportunity provided for meaningful collaboration or feedback during the drafting of the proposed LMR amendments. Instead, districts were asked to provide comments during the public comment period. Early and ongoing engagement would help ensure that the regulation is both effective statewide and feasible to implement locally.

The proposed implementation and compliance timelines also appear overly ambitious given the scope of new requirements, the need for training, and the establishment of new review and approval procedures. Implementation of the proposed changes including expanded plan approvals, compliance determinations, monitoring of both the landfill surface and the Gas Collection and Control System (GCCS), recordkeeping, reporting, and technology verification will require additional district resources, significant preparation and coordination, and training of staff. Based on CARB's estimates, there are a total of 188 landfills in the state and 153 of them operate GCCS and 140 of the 188 are government-owned landfills. The increased resources and challenging timelines, especially for government-owned landfills will add compliance challenges for the districts. A phased

implementation schedule or extended compliance timeline would better support consistent enforcement and reduce disruption to ongoing district operations

SDAPCD is also concerned that the local resources that are required to implement and enforce the proposed rule are underestimated in the rule analysis. The proposed changes significantly expand the level of review and approval required by permitting staff of local districts, including:

- Design Plan Requirements: In addition to submitting and maintaining design plans and modifications, landfills now must submit design plans for control systems (flares, engines, etc.)
- Surface Methane Monitoring: Expanded coverage and frequency would require additional data verification.
- Additional Approval & Review: Alternative Compliance Options, Component Monitoring Plans, and requests for alternative remedies, etc., all that require review, approval, and verification of compliance.

Further, based on SDAPCD's analysis, it would require additional full-time employee (FTE) positions to fully enforce the revised rule, including adequate review design plans, and evaluation of compliance reports expanded monitoring data.

Given that SDAPCD is the primary implementing and enforcement agency for enforcement of landfill air pollution requirements in San Diego County, successful execution of the amended regulation will depend on adequate resources and corresponding financial support. We respectfully request that CARB provide additional funding through the existing Memorandum of Understanding (MOU) between CARB and the air districts to cover the increased workload, staffing, and technical training required by these amendments. Such funding would reinforce CARB's partnership with local agencies and ensure the regulation's success while maintaining the integrity of enforcement programs across the state.

The SDAPCD remains committed to supporting California's climate goals and further reducing methane emissions. We recognize the importance of strengthening the Landfill Methane Regulation; however, successful implementation will depend on practical timelines, proven technologies, and sufficient local resources. We respectfully request that CARB consider these factors and incorporate these considerations before finalizing the rule, including allowing additional time for public review and input.

Thank you for your attention and for the opportunity to provide feedback.

Paula Forbis
Air Pollution Control Officer