



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,

Communities are the most impacted by decisions regarding landfill regulation and oversight. Residents, schools, and local businesses all rely on government agencies like the California Air Resources Board (CARB) to hold landfills accountable and to protect public health. That accountability has been missing for too long. An improperly operating landfill can destroy a community and ruin the lives of hundreds or thousands of residents.

The ongoing crisis at Chiquita Canyon Landfill is a tragic example of the disasters that can occur when there is a lack of effective regulation and meaningful oversight. Landfill operators will only do what is required of them and only when someone is watching. A similar event like Chiquita Canyon can never be allowed to happen again. While the waste management industry is going to talk about cost and affordability, they make billions of dollars of profit from landfills. This updated regulation must protect Californians from experiencing Chiquita Canyon like events.

When landfills are allowed to self report with zero visibility to the communities they impact, where is the accountability?

The residents of Val Verde and neighboring communities have lived for years with the consequences of inadequate landfill oversight and accountability. Families, small children,

pregnant mothers, elderly, and other vulnerable populations have suffered from unbearable odors, health impacts from toxic emissions, and a complete lack of transparency about the air they breathe while regulatory agencies and landfill operators exchange reports behind closed doors.

In March 2025, community members from several communities attended the CARB Board Meeting to plead for change with a clear message: stronger regulations are not enough—communities have a right to know what is in our air. Communities need access to information and early warning systems to protect themselves. The disaster at Chiquita Canyon Landfill is hurting so many people and could have been prevented. It is too late for the Val Verde and Castaic community, but it's not too late to prevent more harm from being done to other frontline communities. California can and should do better!

While there are many things in the LMR proposal that we feel are thoughtful and a step in the right direction, the needs of the people living next to these landfills – **the very people who bear the health, safety, and environmental consequences – were left out of the conversation.**

CARB's proposed amendments may strengthen reporting and monitoring requirements for landfill operators, but they do nothing to ensure that the public can actually see or understand what is happening at these facilities. Under the current proposal, communities are still expected to trust a system that hides critical data and decisions from those most affected by them. That is unacceptable.

The situation at The Avenal Landfill additionally demonstrates why transparency is essential. In 2019, gas wells at Avenal began exceeding 131°F, signaling potential underground combustion and serious operational issues. From 2020-2022, residents filed numerous odor complaints, and even during a public hearing for the landfill's federal Title V air permit renewal, the problem of high landfill gas temperatures was never disclosed to the community. Just this year, a former air district air permitting employee working with the community of Avenal learned about the high landfill gas temperatures. Despite submitting over five public records requests to the local air district and the US EPA in 2025, they still have very little information about what is occurring underground at the Avenal Landfill. If an experienced air permitting professional with four years of experience is having difficulty getting the information needed, what chance do regular community members have in this current system?

Avenal community members are aware people have gotten sick, been diagnosed with cancer, and pregnant women have miscarried. Despite local non-profits sharing information about the high landfill gas temperatures with community members and regulatory agencies, almost two months have passed without air monitoring or updates regarding what has been done or what is happening. The lack of accessibility is unacceptable. Data accessibility must be structured with ordinary residents living near landfills in mind— the people who live, work, and raise families near these facilities. Community members deserve better.

Communities have a fundamental “right to know” what is happening at neighboring facilities – a principle CARB has acknowledged in other programs and reporting frameworks, including community air monitoring initiatives, public notification requirements, and emergency response protocols. Without clear access to real-time or near-real-time emissions data, exceedances, gas collection and control system (GCCS) downtime, planned construction, and enforcement actions, communities cannot make informed decisions to protect their health, advocate for corrective measures, or hold landfill operators accountable.

The following community-driven priorities must be included in the final regulation:

1. Data Transparency and Public Access

CARB should require landfill emissions data — including surface monitoring results, exceedance reports, wellhead monitoring data, documents of repairs, and enforcement actions — to be made publicly available in a timely and accessible format. These reports are already required to be submitted to regulators; there is no reason they should not also be shared with the public. Communities deserve to know when methane or other gases are escaping into the air, what corrective actions are being taken, and whether those actions are effective.

2. Fenceline Monitoring

Fenceline monitoring and community air monitors should be required at all landfills that have homes, schools, or businesses within a 10 mile radius. Perimeter monitoring systems are a key way to alert community members and landfill operators to potential issues in real time, prompt fast corrective action, and ensure that gas collection equipment are actually functioning. This can also be used as a proactive measure to build trust between communities, regulators, and landfill operators.

3. Real-time Public Notification

CARB should require real-time public notification of emissions exceedances or significant odor or super emitter events. Residents should not have to rely on social media rumors, month-old data on third party provider websites, or news reports to learn that methane or toxic compounds are being released nearby. Communities must have access to real-time alerts, online dashboards, or public portals that allow residents to stay informed about local air quality conditions.

Clean air and water are not privileges; they’re basic human rights. CARB has the power and responsibility to make those rights a reality for *all* Californians by embedding transparency, comprehensive monitoring, proactive response frameworks, and accountability into the landfill methane regulation.

Sincerely,

Supporting Organizations:

Jennifer Elkins, President

Val Verde Civic Association

Representing the community closest to Chiquita Canyon Landfill in Castaic

Gavin Bruce, Program Manager

Valley Improvement Projects

Representing communities impacted by:

Fink Road Sanitary Landfill in Stanislaus County;

Republic Services Forward Inc.; and,

Austin Road Landfills in Manteca

Cesar Aguirre, Air and Climate Team Director

Central California Environmental Justice Network

Representing communities impacted by the Avenal Regional Landfill

Lee Helfend, Director of Campaign Strategy

Full Circle Future

Residents impacted by the Avenal Regional Landfill:

Veronica Aguirre, Avenal Resident

Amalia Vasquez

Emiliano Juarez

Alex Martinez

Residents impacted by the Chiquita Canyon Landfill:

Timothy Williams, Vice
President

Val Verde Civic Association

Cynthia Hernandez, Business
Owner impacted by Chiquita
Canyon Landfill and Sunshine
Canyon Landfill

**Aesthetic Collective
Studio's / Collective Skin
Studio**

Luise Huber,
Val Verde Resident

Steven Howse,
Val Verde Resident

Vincent Contarino,
Val Verde Resident

Claudia Border,
Val Verde Resident

Susan M. Evans

Ignacio Romero,
Val Verde Resident

Douglas Broers,
Castaic- Live Oak Community
Resident

Daryl L. Kratz

Brandi Boyle Copenhaver,
Val Verde Resident

Janet Zimmerly,
Live Oak Resident

Clairisa Lauharatanahirun, Val Verde Resident	Frank Kaufman, Castaic - Hasley Hills Community Resident	Sarah Wierman, Castaic and Newhall Resident
Randahl Elkins, Val Verde Resident	Donald Colletta, Castaic - Hasley Hills Community Resident	Robert Melanson, Home Owner in Val Verde
Akiko Minesaki, Val Verde Resident	Huong Kim Kaufman, Castaic - Hasley Hills Community Resident	Vicky Conway, Val Verde Resident
Kevin Manning	Lisa Patchin	Yvette Rubio
Jennifer Elkins	Ronda McCollum, Val Verde Resident	Cher Arabalo, Castaic Resident
Kaisee Pelino, Val Verde Resident	Jacqueline Saldana	Ashlee Rellaforde, Val Verde Resident
Carla Huffman, Castaic Resident	Ian Good, Castaic - Hasley Hills Community Resident	Linda Johns, Castaic - Live Oak Community Resident
Delia Herrera	Vince Cantella, Val Verde Resident	Linda Johns, Castaic - Live Oak Community Resident
Sue Hernandez, Val Verde Resident	Josie	John Scott MacKenzie, Castaic - Live Oak Community Resident
Timothy Huffman, Castaic - Hasley Hills Community Resident	Nathan	Eva Tafipolsky, Castaic - Live Oak Community Resident
Alicia Hernandez, Val Verde Resident	Josefina	Park Matthew MacKenzie, Castaic - Live Oak Community Resident
Oscar Herrera, Val Verde Resident	Rebecca Baurer	Kayla Oyla Van Duser, Castaic - Live Oak Community Resident
Alexandrea Hernandez, Val Verde Resident	Natalie Tate, Val Verde Resident	Leslie Marie Castaneda, Castaic - Live Oak Community Resident
Candice Herrera, Val Verde Resident	Gavin Tate, Val Verde Resident	Darcy Stinson
Matthew Herrera, Val Verde Resident	Thomas Tate Val Verde Resident	Sara Stinson, Castaic Resident
Steve Smith, Castaic Resident	Parker Tate, Val Verde Resident	Diana James, Val Verde Resident

Natalie Alcaras	Nicole Wolfinger, Castaic - Hillcrest Community Resident	Josette Guidos, Castaic - Live Oak Community Resident
Vicki Schmidtberger, Val Verde Resident	Jean Myers	Abigail DeSesa
Betsy Jansen	Ruth Jahn	George Ordway
Romeo Walter Centeno	Greg Violette	Debra Black
Alba Centeno	Agustin Gutierrez	Esmeralda Cabrera, Castaic - Hasley Hills Community Resident
Ben Card IV, Castaic - Hasley Hills Community Resident	Anna Zane, Castaic - Live Oak Community Resident	Kayleigh Elkins, Val Verde Resident
Jafet Centeno	Joseph Zane, Castaic - Live Oak Community Resident	Nathan Elkins, Val Verde Resident
Marivel, Val Verde Resident	Kisha Novelo, Castaic - Hasley Hills Community Resident	Luke Elkins, Val Verde Resident
Julieta Centeno	Joan Ronia	Brittany Hensley, Castaic - Hasley Hills Community Resident
Bianca Recinos	Madelyn Ronia	Shelley Cataldo, Castaic - Hasley Hills Community Resident
David Recinos	Michael Tecinos	Eduardo Carrillo
Kerry Frohling, Castaic - Hillcrest Community Resident		