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SALINAS VALLEY SOLID WASTE AUTHORITY

Working for a future without landfills...

Date: 11-6-2025

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Objection to Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills

To Whom It May Concern:

The Salinas Valley Solid Waste Authority (SVSWA) strongly objects to the proposed amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills (Title 17, CCR §95462–95475) as released in Appendix A-1 of the Initial Statement of Reasons dated September 23, 2025.

While SVSWA supports the goal of reducing methane emissions, these amendments go far beyond what is technically necessary or operationally reasonable. The proposed regulation represents a fundamental overreach—introducing an unworkable set of new monitoring, reporting, and compliance requirements that will impose extreme financial and administrative burdens on public agencies without any substantial corresponding environmental benefit.

1. Operational Overreach and Duplicative Monitoring
CARB's proposal to expand wellhead monitoring to include enhanced monitoring triggers, is excessive and disconnected from practical landfill operations. The new quarterly-to-monthly surface emission monitoring cycles required after a certain number of exceedances, well-by-well "enhanced" verification requirements, and expanded data logging mandates are beyond the staffing and budget capacity of most public landfill operators. There is no scientific justification that these incremental reporting steps yield a measurable improvement in methane capture efficiency.

2. Unfunded Mandate and Fiscal Harm to Ratepayers
Implementation of these amendments would require millions in additional public expenditure statewide, forcing solid waste agencies to divert resources from other essential environmental programs. SVSWA estimates that compliance with the proposed recordkeeping, sensor logging, and corrective action timelines would require a 50–70% increase in wellfield technician hours, additional gas analyzers, and database integration not presently funded. CARB has offered an unrealistic economic/environmental cost-benefit analysis that supports this expanded monitoring regime. The practical result is an unfunded state mandate that will directly increase disposal and collection rates for residents and businesses across California.

3. Unrealistic Timelines and Enforcement Provisions
The compressed corrective action deadlines—many shortened from 120 to 60 days or less—ignore the realities of permitting, procurement, and construction at active landfill sites. The proposed rules assume near-

126 Sun Street, Salinas CA 93901 ▪ tel. (831) 775-3000 ▪ fax (831) 755-1322

instantaneous availability of materials, engineering staff, and contractor support, which is inconsistent with California's public procurement laws and local permitting processes.

4. Inadequate Stakeholder Engagement and Technical Basis
These amendments appear to have been developed without meaningful consultation with local government operators, LEAs, or CalRecycle—agencies that possess the field experience to assess feasibility. The methodology and numeric thresholds in §95469(e) and §95471 were apparently derived from laboratory conditions and fail to consider variability in climate, cover type, and site geology.

5. Request for Regulatory Reconsideration
SVSWA urges CARB to:
1. Withdraw or substantially revise the proposed amendments.
2. Retain the current corrective action timelines and enforcement structure.
3. Develop a tiered compliance approach that distinguishes between large private regional facilities and small or publicly operated landfills.
4. Conduct a complete fiscal impact and cost-benefit analysis based on actual field conditions on the ground before further rulemaking.

Conclusion
The proposed amendments, as drafted, are punitive, infeasible, and misaligned with the operational realities of public landfill management. They will not advance California's methane reduction goals in a meaningful or cost-effective manner. Instead, they will redirect scarce public resources away from practical emission mitigation projects and into a maze of bureaucratic recordkeeping.

SVSWA respectfully requests that CARB suspend adoption of these amendments and engage with local operators, CalRecycle, and regional air districts to craft a technically sound and economically balanced regulation.

Sincerely,

Patrick Mathews

Patrick Mathews, General Manager/CAO
Salinas Valley Solid Waste Authority