

California Air Resources Board

1001 I Street
Sacramento, CA 95814

Re: Comments on Proposed Amendments to the Regulation on Methane Emissions from Municipal Solid Waste Landfills (Title 17, CCR §95460 et seq.)

From: Windfall Bio

Date: November 10, 2025

Dear CARB Review Team,

Windfall Bio appreciates the opportunity to comment on CARB's *Proposed Amendments to the Landfill Methane Regulation (LMR)*. We commend CARB's leadership in advancing accuracy and transparency of methane emissions reporting and mitigation efforts at landfills, which are a significant emissions source in California, and globally.

Windfall Bio is a California-based company developing **methane-oxidizing microbial systems** that destroy methane both through **biofilters** (for collected landfill gas) and **biocovers** (for fugitive surface emissions and volatile organic compounds). Our systems biologically convert methane into CO₂ and nutrient-rich organic fertilizer. We have successfully deployed these microbial systems at **Sunshine Canyon Landfill in Los Angeles County** and at multiple **landfills in Australia** as part of pilot-scale methane abatement projects.

Our work depends on **frequent and continuous methane monitoring** to quantify abatement performance and identify emissions patterns over time. We strongly support CARB's intent to expand monitoring under the LMR and encourage the review team to ensure that regulatory design promotes, not discourages, more frequent measurement.

Even with strong gas collection systems, diffuse surface emissions and operational variability limit gas capture efficiency. More frequent or continuous monitoring provides the real-time insight needed to locate leaks, optimize wellhead performance, and verify the performance of cover and oxidation systems. In this way, frequent measurement directly advances CARB's goals of improving collection efficiency and reducing methane faster. We are therefore supportive of CARB's inclusion of flexible remote sensing allowances, including continuous monitoring.

We recommend that CARB **explicitly encourage monitoring monthly or more frequently** to capture the temporal pattern of landfill emissions and to support

proactive management. We also recommend encouraging more frequent re-monitoring, which should allow for the use of continuous monitoring, to confirm whether an observed emissions is temporary or persistent. We believe that explicitly encouraging continuous, daily, weekly or more frequent monitoring will encourage operators to adopt these practices that will support more accurate methane emissions reporting and proactive mitigation efforts.

Windfall Bio supports CARB's efforts to strengthen methane emissions reporting and mitigation efforts. We believe more transparent and accurate methane emissions reporting will incentivize investments in proactive mitigation efforts, including improved gas collection efficiency and application of oxidative covers. Together, these approaches can deliver measurable, permanent reductions in landfill methane emissions.

Sincerely,
McKenzie Wilson

A handwritten signature in black ink, reading 'McKenzie Wilson' in a cursive script.

Director of Regulatory Affairs & Sustainability
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