

April 17, 2026

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: “Landfill Methane Regulations 15-day proposed changes” Comments**

Dear Chair Sanchez, Board Members, and CARB staff,

California communities applaud your leadership in establishing the most stringent landfill methane regulations in the United States. These rules represent a critical commitment to reducing harmful emissions and protecting public health. We urge you to defend them.

We support CARB’s commitment to data transparency, which will allow communities to make vital decisions in protecting their own health and safety. Residents can use this data to determine if they should stay indoors or leave the area. Schools can use the data to determine if it’s safe for children to play outside during recess or if extra measures should be taken to protect sensitive groups. Knowledge is power, and putting that power into the hands of communities allows us to take proactive and preventative measures. We urge CARB to take this one step further by posting landfill reports from the past five years. Historical data is essential for understanding patterns of compliance and identifying systemic issues.

We also support mandatory reporting of High Operating Value (HOV) requests and decisions to the Executive Officer. This measure will hold landfill operators accountable and provide oversight to prevent unnecessary harm to communities. However, transparency must extend beyond agency walls. The public deserves access to this information. At a minimum, CARB should publicly disclose when an HOV waiver is requested, who submitted the request, the reason for it, and the final decision. Public awareness is the foundation of trust and ensures that regulatory processes serve people, not corporate interests. Transparency matters — not just as a procedural step, but as a safeguard for community health and justice. Making this information accessible will strengthen public trust, empower communities to participate meaningfully in oversight, and ensure that environmental protections are enforced equitably. **When transparency is limited, communities bear the consequences.**

As residents made clear at the November Board Hearing, those living near landfills are the most directly affected by regulatory decisions and deserve full visibility into how those decisions are made. Families, schools, and local businesses depend on government agencies like the California Air Resources Board (CARB) to hold landfills accountable and to protect public health. An improperly operating landfill does not merely inconvenience a neighborhood — it can devastate it, as we know all too well from lived experience.

The ongoing crisis at Chiquita Canyon Landfill is a stark warning of the disasters that can occur when regulation fails and oversight is absent. Toxic leachate, uncontrolled subsurface reactions,

and displaced residents are not abstractions — they are the lived reality of regulatory breakdown. Communities near Sunshine Canyon, Avenal, Napa Valley, and elsewhere are experiencing similar impacts from mismanaged, underregulated facilities. The updated Landfill Methane Regulation must be designed to prevent another disaster like Chiquita Canyon - not to accommodate the conditions that created it.

We are deeply concerned about the following changes that CARB has proposed:

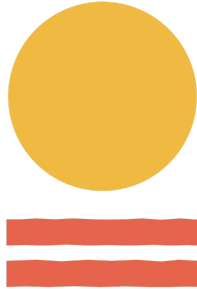
1. **Downwell Monitoring Temperature Threshold:** A threshold of 145 F remains dangerously high, and a six-month monitoring interval is far too infrequent. Conditions inside a landfill can change substantially from week to week. Temperatures above 131 F indicate that there is a problem and heat generating chemical reactions may be occurring. Landfills with downwell temperatures above 131 F need to be closely monitored, as temperatures can quickly increase once a chemical reaction has begun. We are seeing this at landfills across the state and we saw this at Chiquita, where temperatures continue to rise. Effective regulation requires proactive detection of thermal anomalies — not a reactive response after a crisis has already begun. We urge CARB to lower the 145F threshold, and shorten the monitoring interval to reflect the urgency these situations demand.
2. **Compliance Flexibility Provisions:** Several proposed changes — including provisions allowing operators to reset compliance deadlines and submit required information on extended timelines — function as loopholes that benefit landfill operators at the expense of communities. Chiquita Canyon has shown over and over again that if there is a loophole, they will use it. Section § 95464. Gas Collection and Control System Requirements states, “No more than 10 wells are offline simultaneously, only counting wells that are offline in excess of 24 hours. Wells that are shut down to prevent or extinguish fire and permanently decommissioned wells do not count toward this limit.” The 24-hour exemption in § 95464 creates a regulatory loophole that undermines the intent of continuous gas collection and community protection.
3. **Gas Collection System Downtime:** Categorical exemptions from downtime requirements undermine the core purpose of this regulation by allowing methane and other pollutants to go unchecked. Exemptions that allow operators to side step collection requirements — even temporarily — create windows of uncontrolled emissions that directly harm surrounding communities. Downtime, even for a few days, can be detrimental to neighboring residents. We must strive for minimal downtime. Chiquita Canyon Landfill notoriously has planned maintenance and downtime of equipment on weekends and holidays, but pollution doesn’t adhere to a clock or calendar. Why should facilities that have already demonstrated an inability to operate responsibly be rewarded with more time and fewer consequences? Flexibility provisions must not come at the cost of accountability.

- 4. Bureaucratic Hurdles:** Fifteen days is not nearly enough time for the public to meaningfully review complex regulatory changes. The language in these documents is highly technical, and community members need adequate time and support to understand what is being proposed in order to provide informed comments. We respectfully request that, moving forward, CARB staff hold a public meeting to walk through the regulatory changes in plain language and answer questions directly from impacted communities. This is essential for transparency and for ensuring that the public can fully participate in the process. We also request that the public comment period be extended to a minimum of 30 days. Communities deserve a real seat at the table, and our voices must have the opportunity to be heard — especially when these decisions have the power to significantly affect our daily lives, our health, and our future.

Preventing subsurface exothermic (SET) and elevated temperature landfill (ETLF) events isn't just a safety and environmental win; it's financially smart. CARB's newly adopted Landfill Methane Regulations will prove to save landfill operators millions of dollars. CARB's updated rules reduce the likelihood of and severity of SET/ETLF events - events that are notoriously expensive to manage. Early detection prevents catastrophic failures. Stronger monitoring and shorter repair timelines reduce long-term liabilities. This is a win-win situation for both the waste industry and communities. The cost of compliance is far lower than the cost of an environmental disaster.

We urge CARB to uphold the regulations which were unanimously adopted by the Board in November, and to refrain from weakening the rule which helped protect communities from landfill fires. Federal regulations under the Clean Air Act set the floor for landfill operating standards; as a national leader in climate and environmental policy, California has a responsibility to not only meet, but exceed, those standards. You must hold strong. Basic accountability, compliance with federal law, and transparency are not negotiating positions; they are the foundation on which these regulations must stand. Our families are depending on you.

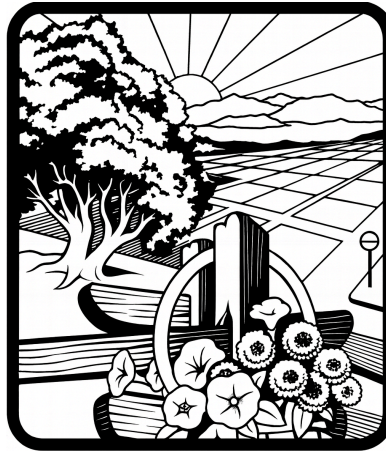
Respectfully,



# Full Circle Future



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