



April 17, 2026

SENT VIA ELECTRONIC MAIL

Steven Cliff, PhD
Executive Officer
California Air Resources Board

Subject: Landfill Methane Regulation 15-Day Changes Comments

Dear Dr. Cliff,

The Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) appreciates the opportunity to comment on the 15-day changes to the Landfill Methane Regulation (LMR) and recognizes the additional flexibility and clarifications included in this update. We offer the following feedback to highlight still remaining areas of significant concern related to federal alignment, implementation clarity, district workload, and costs.

COMMENT 1: Additional Alignment with Federal Requirements Still Needed

- §95464(d); §95469(e)(3)–(4): The LMR establishes multiple wellhead temperature thresholds (55 °C and 62.8 °C) with associated monitoring and corrective actions. Under 40 CFR 60 Subpart XXX §60.762(b)(2)(iv), landfills may elect to comply with 40 CFR 63 Subpart AAAAA, which provides a single temperature standard and unified monitoring framework. The 15-day changes retain both thresholds without recognizing this federal opt-in provision. As a result, landfills electing Subpart AAAAA must still comply with both thresholds, creating conflicting requirements. CARB should revise §95464(d) and §95469(e) to recognize the federal opt-in provision and allow compliance with a single temperature standard.
- §95464(b)(3); §95475: The 15-day changes extend LMR applicability to gas treatment and upgrading systems and downstream uses, including engines fueled with treated landfill gas. However, EPA has determined that once landfill gas is treated, it is no longer subject to federal landfill regulations. CARB should clarify that LMR requirements do not apply to engines or equipment using treated landfill gas, consistent with federal applicability.
- §95475; §95464(c); §95464(d): The addition of “interior well” improves clarity, but non-interior wells remain undefined, and the removal of “perimeter” increases ambiguity. At the same time, requirements in §95464 continue to apply broadly to “each wellhead.” Federal regulations distinguish between GCCS wells and other wells. CARB should define non-interior wells and clarify that §95464 applies only to wells that are part of the gas collection and control system.

COMMENT 2: Satellite Methane Detection Notification

We understand CARB's position is that plume notifications will be handled through internal coordination only and that you believe the LMR may not directly apply to local air districts. However, we continue to recommend that your rule explicitly require notification to the applicable air district when a remotely detected methane plume is identified. Some of those emissions may fall strictly under air district authority, not CARB's. Thus, including this provision would improve transparency and ensure that the agency responsible for local oversight is informed of significant methane events, regardless of how CARB manages coordination internally.

COMMENT 3: District Workload Remains Despite Implementation Flexibility

We appreciate the additional flexibility and clarity provided in the 15-day changes to §§95464, 95469, and 95470. However, districts will still need to review monitoring plans, evaluate data, track recurring exceedances, and review expanded reporting requirements. Provisions such as enhanced wellhead monitoring, cover integrity monitoring plans, and quarterly reporting continue to require significant staff time. While these updates improve implementation in some areas, they do not reduce the overall workload for air districts. As a result, it remains challenging for the Sac Metro Air District to support LMR implementation under an MOU with CARB without additional funding.

COMMENT 4: CARB Cost Estimates Remain Significantly Below Air District Estimates

We appreciate that CARB acknowledged the original implementation cost estimates were low and requested updated cost information from air districts. Unfortunately, our updated estimates based on the most recent 15-day changes indicate that costs for air districts are going up, not down. For the Sac Metro Air District, the level of new effort would be more than three times higher than resources needed under the original LMR. In addition, CARB should not expect air districts to be responsible for identifying new funding, including from the Legislature, to implement state regulations. Instead, CARB should evaluate and identify the necessary funding mechanisms as part of the rulemaking process to ensure effective implementation by all responsible entities.

Several air districts supplied cost estimates to CARB so that a more accurate assessment of implementation costs could be considered in the rulemaking process. However, we find the LMR still does not reflect accurate costs, exacerbating a significant underestimation of costs for air district implementation. As a result, a large funding gap remains for air districts and no clear mechanism for how to address it.

In closing, based on experience implementing the state's Criteria and Toxics Reporting Regulation and other programs, taking on significant new workload from CARB's rules without new funding is not sensible for the Sac Metro Air District. In addition, many districts, including us, are not in a position to recover these costs through new or increased fees. Thus, we continue to encourage consideration of funding mechanisms, such as grant programs used in other CARB programs, to support local implementation and ensure consistent statewide enforcement. Thank you for the opportunity to provide feedback, and we appreciate the continued collaboration with CARB. If you have any questions, please contact Angela Thompson, Compliance Manager, at AThompson@airquality.org or 279.207.1165.

Sincerely,



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Sacramento Metropolitan Air Quality Management District

cc:

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