



CALIFORNIA ASSOCIATION OF REALTORS®

April 13, 2025

California Air Resources Board
1001 I Street
Sacramento, CA 95814
Email: <https://ww2.arb.ca.gov/lispub/comm/bclist.php>

Re: Methane Emissions from Municipal Solid Waste Landfills (Title 17, CCR §§ 95462 – 95475) - 15-Day Modifications - AMEND

To Whom It May Concern:

The California Association of REALTORS® (C.A.R.) appreciates the opportunity to comment on the 15-day modifications to the proposed amendments to the Landfill Methane Regulation (LMR). We recognize CARB's efforts to address implementation challenges, particularly through updates to compliance timelines and certain operational requirements.

At the same time, our core concern remain, the proposal continues to impose significant compliance costs on landfill operators, which will likely be reflected in higher solid waste collection rates paid by California residents. While the 15-day changes improve feasibility for operators, they do not address the downstream impacts to households already facing increasing housing and living costs.

C.A.R. respectfully offers the following for consideration:

1. **Residential Cost Impacts.** The updated cost estimates reinforce the need to better understand how these requirements may affect household solid waste rates. C.A.R. encourages CARB to further evaluate and clearly communicate potential residential rate impacts prior to final adoption.
2. **Coordination with Existing Programs.** The proposal expands monitoring and reporting requirements. To avoid potential overlap at the local level, CARB should coordinate with CalRecycle and existing SB 1383 implementation efforts to ensure alignment where feasible.
3. **Implementation Approach.** While certain timelines have been extended, additional guidance on phased compliance benchmarks would help ensure implementation occurs in a way that limits unnecessary cost increases for local governments and ratepayers.

C.A.R. appreciates CARB's continued work on this rulemaking and its broader efforts to reduce greenhouse gas emissions. We ask that these considerations be addressed to help avoid unintended impacts on housing affordability and household costs.

Thank you for your consideration. Please contact me at kevinr@car.org if you have any questions or if we can provide further input as this process moves forward.

Sincerely,

Kevin Rodgers
Regulatory Advocate



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