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April 17, 2026

ELECTRONIC MAIL

Clerk of the Board, California Air Resources Board
1001 I Street, Sacramento, California 95814
Attention: Ms. Anthy Alexiades, Manager, Short-lived Climate Pollutant Policy Section

SUPPLEMENTAL COMMENTS ON THE PROPOSED AMENDMENTS TO THE LANDFILL METHANE REGULATION (LMR)

The City of Los Angeles, through the Los Angeles Sanitation and Environment (LASAN) Solid Resources Program, respectfully submits these supplemental comments on the 15-Day Notice of Proposed Amendments to the Landfill Methane Regulation (LMR) issued by the California Air Resources Board. LASAN Solid Resources is responsible for long-term management, monitoring, and regulatory compliance of the City's closed landfill facilities, including implementation of landfill gas collection and control systems and associated monitoring programs.

These facilities operate under stable and declining emissions conditions that are fundamentally different from active disposal sites yet remain subject to comprehensive state and local regulatory requirements. LASAN supports California's goals to reduce methane emissions of potent greenhouse gas generated from decomposing organic waste and the continued advancement of effective methane control strategies. However, LASAN offers the following supplemental input to ensure the proposed amendments reflect the operational realities and emissions profiles of closed landfills, and that requirements remain technically feasible, risk-based, and cost-effective for municipal solid waste agencies responsible for post-closure care.

We share the CARB goal to reduce methane from landfills and LASAN has been actively reducing methane emissions from landfills for decades. Our comments are intended to support regulatory

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approaches that maintain environmental protection while providing appropriate flexibility for closed landfills with low and declining emissions.

1. Distinction Between Active and Legacy Closed Landfills

The current regulatory framework often applies similar compliance burdens to both active landfills and long-closed facilities. However, there is a fundamental physical distinction between the two. Active landfills maintain high rates of methanogenesis due to continuous fresh organic input. In contrast, "Legacy Closed Landfills", those that have not accepted waste for 30 years or more, contain waste that has undergone multiple first-order decay cycles.

For these facilities, the peak methane generation phase has long passed. The exponential decline in gas production results in significantly lower and continually diminishing emissions, representing a substantially reduced contribution to the State's methane inventory.

2. Proposed Regulatory Definition: "Legacy Closed Landfill"

LASAN reiterates the need for a formal definition of "Legacy Closed Landfill" within Section 95463. Facilities that have been closed for 30 years or more exhibit a diminishing methane profile that does not warrant the intensified monitoring frequencies proposed in the current amendments.

"Legacy Closed Landfill" means a municipal solid waste (MSW) landfill that:

(a) has ceased accepting waste for at least 30 years; (b) has an approved closure permit or equivalent documentation from the Local Enforcement Agency (LEA); and (c) demonstrates, through gas generation modeling or historical collection data, that it is in a state of advanced first-order decay with declining methane production.

3. Rule Sections Recommended for Modification

Section 95468: Lifecycle-Based Compliance Transition

We propose that Section 95468 (Alternative Compliance Options) include a formal "Lifecycle-Based Compliance Transition" for Legacy sites. The "Equivalency Test" in Section 95468(c)(2) should be satisfied by demonstrating that the site is in advanced decay and fugitive emissions are below a stable threshold. This should include: (a) Extended Approval Duration: Alternative Compliance Plans for Legacy sites should be valid for 10 years and (b) Streamlined Passive Transition: A standardized "off-ramp" to transition from active GCCS to passive venting or biofiltration once and landfill methane production drops below efficient extraction levels.

Integrating this definition is essential to prevent the proposed amendments from nullifying the flexibilities offered in Section 95468. Without a clear lifecycle-based transition, the regulation would limit practical access to compliance alternatives for post-closure facilities that have already passed their peak methane generation phase

Section 95469: Surface Emissions Monitoring (SEM)

For facilities meeting the Legacy Closed Landfill criteria with three consecutive years of compliance, we recommend the ability to maintain or reduce SEM frequency to an annual schedule. Given the advanced decay and low internal pressure of these sites, the risk of surface exceedances is significantly lower than at active facilities.

Section 95469: Monitoring Frequency & Seasonal Conflicts

The shift from annual monitoring to "every three quarters" for clean grids (95469(c)) creates significant logistical and safety challenges. Seasonal Risk: This schedule forces monitoring into the first and fourth quarters, overlapping with the holiday season and California's rainy season. Operational Risks: Wet conditions compromise instrument accuracy and increase safety risks for field personnel, particularly on slopes and capped surfaces. This proposed frequency may conflict with the practical ability to obtain accurate and representative monitoring data under field conditions, potentially undermining data quality objectives within the regulation.

LASAN recommends maintaining annual monitoring for Legacy Closed Landfills.

Section 95470: Recordkeeping and Reporting Remote Monitoring Integration.

LASAN requests incorporating a Standardized Anomaly Protocol for remote data validation within the 15-day review window. If automated or remote sensors detect a 'plume' anomaly or a sensor communication failure, the owner/operator should have the right to flag these events as "Data Validation Event pending Manual verification" without triggering an immediate notice of violation, provided a manual verification is performed within 72 hours. This provides the owner operator to review data and the reported information to distinguish between actual environmental exceedances and sensor malfunctions, preventing unnecessary administrative burdens for both the operator and the state. Without such a protocol, automated data remote sensing triggers may result in false exceedances, which is inconsistent with the regulation's intent to identify true emissions events.

Conclusion

Recognizing the distinct lifecycle stages of landfills is essential for a regulation that is both effective and equitable. By creating a specific compliance tier for facilities that are 30 years post-closure, CARB can focus its enforcement resources on high-emitting sources while maintaining appropriate oversight and providing for realistic, cost-effective regulations for facilities that no longer pose a significant threat of methane release.

Thank you for the opportunity to comment on these important regulatory updates.

Subject: City of Los Angeles, Los Angeles Sanitation and Environment Comments to Proposed Amendments to the Landfill Methane Regulation (LMR)

Date: April 17, 2026

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If you require additional information, please contact Mr. Miguel Zermeno, Division Manager at (213) 485-3611 or by email at miguel.zermeno@lacity.org or Mr. Arpa Bahariance, Senior Environmental Compliance Inspector at (818) 485-0720, or by e-mail at arpa.bahariance@lacity.org.

Sincerely,



Miguel Zermeno for
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Interim Director and General Manager
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MZ/JM:jm

c: Ms. Anthy Alexiades, California Air Resources Board Manager, Short-lived Climate Policy
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