

To whom it may concern,

[Windfall Bio](http://www.windfall.bio) is a San Mateo, California based methane-to-value biotech company that harnesses the power of methanotrophs to mitigate methane emissions and transform methane to fertilizer. We are actively collaborating with industry and academic partners to oversee biofilter and biocover field trials at municipal solid waste landfills in both the U.S. and abroad.

Windfall Bio commends CARB for its efforts in hosting the December 2024 workshop focused on potential updates to the landfill methane regulation.

We are encouraged by the practice changes under CARB's consideration, ranging from improved monitoring of gas collection and control systems (GCCS) and incorporating new measurement technologies/techniques to detect leaks. Robust monitoring practices are critical to identifying and repairing leaks. However, they are reactive, focusing on identifying leaks after they occur.

However, we are disappointed that CARB is not considering more proactive methane mitigation practices, particularly those related to daily, intermediate and final cover. For example, we encourage CARB to consider how its daily, intermediate, and final cover requirements can encourage the introduction and growth of methanotrophic bacteria that naturally consume methane. Methanotrophic oxidation leverages natural processes and addresses methane emissions at the source, making it a more sustainable long-term solution compared to constant leak monitoring, detection, and repair.

Furthermore, methanotrophic bacteria, such as those in Windfall Bio's consortia, are able to consume not only methane but other odorous gases, such as ammonia and hydrogen sulfide that negatively impact air quality and community health. Landfills can increase their methanotrophic populations by directly introducing methanotrophs in their covers (e.g. using compost, biochar or other amendment that is inoculated with methanotrophs) and by constructing methanotroph-friendly covers (e.g. that allow for adequate airflow of both methane and oxygen and provide sufficient substrate upon which the methanotrophs can grow).

We applaud CARB's efforts to engage the community of landfill operators as well as methane abatement and measurement professionals and are grateful for the opportunity to provide feedback as CARB considers rulemaking updates.

We encourage action consistent with our above comments, and look forward to assisting in these endeavors.

Sincerely,

A handwritten signature in black ink that reads 'Corinne Young'.

Corinne Young, Director of Regulatory Affairs, Windfall Bio

cc: McKenzie Wilson, Director of Carbon Accounting, Windfall Bio