



January 24, 2025

Liane Randolph, Chair
Members of the Board
California Air Resources Board
via electronic submittal

Re: Comments on the Public Workshop on Potential Updates to the Landfill Methane Regulation, December 18, 2024

Dear Chair Randolph and Board Members,

We are pleased to comment on proposals for updating the 2010 Landfill Methane Regulation (LMR), on behalf of Climate Action California's more than 11,000 supporters around the nation.

We wish to associate Climate Action California with the detailed proposals in the coalition letter led by Californians Against Waste and dated January 24, 2025.

We believe a nationally best-in-class landfill methane regulation in California will be copied by many other states, giving this current update process particular power and urgency.

Climate Action California would like to emphasize two points.

1. Drone sensing protocols should be mandatory, not voluntary

The Workshop's drone sensing proposals recognize that a pivotal, even historic technical capability now exists. It is reasonable to expect detection pattern completeness and frequency of screening events that is better than ever, at a low cost that can be appealing even to smaller entities across our state.

This technical capability will enable earlier leak detection, as well as more complete leak detection with no blind spots. These technical advances are truly revolutionary, especially if combined with artificial intelligence. We believe that drone sensing protocols should be mandatory in the regulation, not voluntary.

2. CARB's timeline for updating the Regulation is too late.

Given that we are already halfway through the vital 2020's decade—which puts humankind's challenging 2030 emissions goals at considerable risk—Climate Action California believes that speed is of the essence.

An effective date late next year or in early 2027 for the regulation (mentioned near the end of the December 18, 2024 Workshop) is unnecessarily late. Science and the Methane Pledge participants led by Governor Newsom all agree: Methane reductions are the best tool we have to make a difference to global heating during the next decade. Without those reductions we have no chance of limiting warming to 1.5 degrees C.

We appreciate the opportunity to comment on this update to the 2010 landfill methane regulation.

Thank you for all of the work you and the landfill methane team do to protect Californians from air pollution from landfills and the worst impacts of climate change.

Sincerely,

A handwritten signature in black ink that reads "Will Brieger". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Will Brieger, Director
Climate Action California

A handwritten signature in black ink that reads "Bill Murphy". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Bill Murphy, Waste Methane Team Lead
Climate Action California