



September 16, 2026

Roadmap to Reduce Air Toxics Program
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Draft 2026 CARB Roadmap to Reduce Air Toxics Program (“Roadmap”) – Request to Include Landfills

Dear Roadmap Team:

On behalf of the undersigned organizations, we strongly support the California Air Resources Board (CARB or “the Board”) recognizing landfills as a critical source of air toxic exposure that must be addressed in this Roadmap. We welcome the Board’s decision to move forward with a Roadmap that defines a path to strengthen, modernize, and reshape the Air Toxics Program from a reactive system to a proactive program. As part of this effort, the Roadmap should specifically address landfills, which are a significant source of identified Toxic Air Contaminants (TACs) and have had devastating impacts on communities across California.

Landfills emit toxic pollutants and volatile organic compounds, including benzene, vinyl chloride, hydrogen sulfide, and other hazardous compounds that pose serious risks to public health, particularly for the communities located near landfills. Because landfills can remain open for decades, and closed landfills can continue generating landfill gas and other emissions long after they stop accepting waste, nearby communities may face prolonged exposure to air pollution and associated health risks. These concerns are particularly acute in communities experiencing subsurface elevated temperature (SET) events, where landfill conditions can lead to increased emissions and other environmental hazards.

In November 2025, CARB updated their Landfill Methane Regulation (LMR) to better detect and curb methane emissions from landfills, an important step toward reducing the state’s second-largest source of climate-warming pollution. These new updates will eventually require landfill operators to take action when methane leaks are detected by satellite or aircraft, improve routine leak monitoring and reporting, and take stronger action to address recurring leaks.

While we celebrate this rule as an important milestone, it is focused specifically on methane emissions and does not adequately address the serious regional impacts of toxic air contaminant emissions from landfills. In addition to methane, landfills emit other air pollutants and volatile organic compounds that can cause headaches, respiratory irritation, and other adverse health effects, with some pollutants linked to cancer. These emissions can directly affect nearby communities and can disproportionately burden disadvantaged communities that are already facing multiple sources of environmental pollution. For example, residents living near the Chiquita Canyon Landfill in Castaic, California have reported widespread physical and mental health impacts linked to persistent noxious odors and chemical emissions from an ongoing SET event.

The undersigned organizations therefore urge CARB to include landfills as a significant source of air toxics in California and recognize the disproportionate impacts these emissions can have on communities located near landfill facilities. As CARB moves forward with the LMR efforts to better track, monitor, and publicly report methane emissions, communities also deserve meaningful information about the toxic air contaminants they may be exposed to on a daily basis. Including landfills in the Roadmap would help CARB develop a more comprehensive understanding of these exposures and establish a proactive framework to better monitor, address, and prevent harmful landfill emissions. As a result, the LMR and the Roadmap can work together to address these distinct but interconnected threats and provide communities with a more comprehensive approach to monitoring and reducing landfill emissions and their exposure.

Thank you for this opportunity to provide comments and for undertaking this important work.

Sincerely,

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