

Executive Director Jill Hunsaker Ryan  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80246

Dear Director Ryan,

We, the undersigned organizations, commend the Colorado Department of Public Health and Environment (CDPHE) for its leadership in tackling methane pollution. We strongly support the Department's planned rulemaking to address climate- and health-harming pollution from Colorado's landfills, and we urge CDPHE to move swiftly to develop an ambitious and comprehensive standard that embraces the latest best practices and affordable new technologies.

Landfills are the third largest contributor to Colorado's methane emissions. Methane is a potent greenhouse gas with more than 80 times the near-term heating power of carbon dioxide. Beyond the significant warming impacts, landfill gas contains hazardous air pollutants, precursors to ozone and particulate matter, odors, and other dangerous gases that negatively impact air quality, health, and quality of life for neighboring communities. In Colorado, a number of landfill sites are [located in or near low-income communities and communities of color](#), making this a critical environmental justice crisis.

Fortunately, proven, low-cost solutions are available to better monitor and control landfill methane pollution, and CDPHE is well positioned to act, building from recent landfill rulemakings in other states and Colorado's own nation-leading methane standards for the oil and gas sector. Furthermore, thanks to the Inflation Reduction Act, Colorado [was recently awarded \\$129 million in federal funding](#) for emissions reduction measures, including landfill methane abatement, which can support the implementation of these rules.

We urge CDPHE to leverage this funding and coordinate with the Colorado Energy Office to maximize the impact of these efforts. In order for the rulemaking to achieve substantial methane reductions, CDPHE should:

1. **Lower thresholds for the installation of gas collection, ensure landfills capable of capturing landfill gas are doing so throughout the landfill, at the earliest feasible time, and in accordance with rigorous standards** for gas control system design, installation, and operation to boost system efficiency. CDPHE should lower the installation thresholds to cover all MSW landfills with 200,000 metric tons of waste in place, reduce lag time in installation to less than a year, and consider other measures that can boost the performance of the gas collection and control system including in active cells – such as horizontal collectors, automated well-tuning systems, and high-efficiency flares.
2. **Include robust and effective cover requirements to limit methane emissions from the landfill surface.** To reduce fugitive emissions, CPDHE should establish standards to

minimize the size of the active working face, ensure cover integrity, reduce lag times between daily, intermediate, and final cover, and use materials like biocover that can more effectively oxidize methane.

3. **Deploy advanced monitoring approaches for prompt detection and mitigation of leaks.** Monthly drone-based monitoring, continuous emissions monitoring, and other advanced monitoring with satellites can provide more frequent, objective, reliable, and comprehensive data on landfill emissions – helping operators find and fix more leaks while reducing safety risks and creating cost savings. In addition, CDPHE should establish a Super Emitter Program, leveraging remote sensing data to identify large leaks, notify operators, and require investigation and mitigation of those emissions.
4. **Encourage the diversion of organic waste from landfills to avoid new methane generation.** Reducing organic waste disposal – promoting waste prevention, edible food recovery, and composting programs– can avoid future landfill methane pollution while creating job opportunities in the circular economy, addressing food insecurity, and producing valuable products like compost that sequester carbon and improve soil health.

We are grateful for your efforts in positioning Colorado as a national leader in reducing methane emissions from landfills. The benefits of these actions are clear: they will slow near-term warming, improve air quality, protect public health, and help meet Colorado's climate goals. We stand ready to support your continued leadership and partnership in this critical effort and urge swift and decisive action to safeguard our environment and communities.

Thank you for your consideration.

Sincerely,





**ADDITIONAL SUPPORTING ORGANIZATIONS:**

CASE Citizens Alliance for a Sustainable Englewood

CCLC (Colorado Coalition for a Livable Climate)

Climate Reality Project - Northern Colorado Chapter

Colorado Fiscal Institute

Compost Queen

Durango Compost Company

NRDC (Natural Resources Defense Council)

Scraps, Ltd