

March 2025

Dear CDPHE Director Ryan,

As elected officials from across Colorado, we write to express our strong support for the Colorado Department of Public Health and Environment's planned rulemaking to address methane pollution from landfills. We believe that every Coloradan deserves clean air, clean water, and a stable climate. We urge CDPHE to move swiftly to develop a comprehensive, nation-leading landfill standard that embraces the latest best practices and available technologies to drastically cut methane emissions, advance Colorado's climate and clean air goals, and protect the health of our constituents.

In Colorado, municipal solid waste landfills are the third largest source of methane, a climate super pollutant with 80 times the near-term warming power of carbon dioxide. And beyond the dangerous warming impacts, landfills emit odors, hazardous air pollutants, and ozone precursors that harm our health, air quality, and quality of life. A number of Colorado landfills are located in low-income communities and communities of color, including in severe ozone nonattainment areas.

Fortunately, there are proven, cost-effective solutions to better find and reduce methane from landfills. While there are many items to improve, we focus on three key provisions the rule should include:

1. **Strengthen requirements for installation and operation of landfill gas collection and control systems.** Ensure landfills capable of capturing landfill gas are doing so throughout the landfill, at the earliest feasible date (e.g., within one year and including active cells), and in accordance with rigorous standards for gas control system design, installation, and operation. [The EPA estimates](#) fifty percent of the carbon in food waste is degraded to landfill gas within 3.6 years. Yet current rules give landfills up to five years to install gas capture and control systems in active cells. This means a large amount of food waste has degraded to methane and escaped to the atmosphere before any collection system is in place.
2. **Require deployment of advanced monitoring technologies** for prompt detection and mitigation of emissions and to verify performance of landfill gas collection and control systems. There are significant gaps in current monitoring protocols, and a new rule should include an advanced leak detection program for operators (e.g., monthly drone-based or continuous monitoring) and a super-emitter program to leverage readily available remote sensing data to quickly find and fix large leaks.

3. **Include robust and effective landfill cover requirements** to limit methane emissions from the landfill surface. Establish standards to minimize the size of the landfill active working face, ensure cover integrity, and use materials like biocover that oxidize methane.

In addition, we encourage CDPHE to advance programs and policies that divert organic waste from landfills. By promoting waste prevention, edible food recovery, and composting programs, CDPHE can help avoid future landfill methane pollution while creating job opportunities in the circular economy, addressing food insecurity in our communities, and producing valuable products like compost that sequester carbon and improve soil health.

Without fast action on methane, local governments will increasingly face the impacts of rising temperatures, toxic air pollution, and extreme weather events. Through a strong rule, CDPHE can help slow the pace of global warming, achieve cleaner air, and protect public health. Thank you for your consideration, and we are here to support in whatever ways that we can.

Sincerely,

Aaron Brockett	Mayor	City of Boulder
Alan Apt	Former Board of Trustees Member, Former City Council Member	Nederland, Fort Collins
Ashley Stolzmann	Boulder County Commissioner	Boulder County
Brianna Titone	State Representative	HD27
Bruce Leslie	Broomfield City Council Member, Ward 4.	City and County of Broomfield
Cathy Kipp	Senator	Colorado, Senate District 14
David Fridland	Councilmember	Lafayette
Elizabeth Velasco	State Representative	HD57
Emily Baer	Council Member	Town of Erie
Emma Pinter	Chair, Commissioner	Adams County, CO
Faith Winter	State Senator	District 25

Flor Alvidrez	Councilmember for City and County of Denver	District 7
Guyleen Castriotta	Mayor	City and County of Broomfield
Isabel Cruz	Ward 2 Councilmember	City of Lakewood
Jacob LaBure	City Councilman	Ward 5, City of Lakewood
Jamie Jackson	State Representative	House District 41
John I. Clark	Mayor	Town of Ridgway
John Kefalas	Commissioner	Larimer County
Judy Amabile	State Senator, District 18	State
Junie Joseph	State Representative	House District 10
Kristi Douglas	Councilmember At-Large	Commerce City
Lance Waring	County Commissioner	San Miguel County
Laura Weinberg	Mayor	City of Golden
Lauren Folkerts	Mayor Pro-Tem	City of Boulder
Laurie Anderson	Councilmember	City & County of Broomfield
Lesley Smith	State Representative	HD49
Lisa Cutter	State Senator	Senate District 20
Matt Scherr	County Commissioner	Eagle County
Mike Weissman	State Senator	Senate District 28
Paloma Delgadillo	Councilmember	Broomfield, CO
Paul Kashmann	City Council District 6	City and County of Denver
Randy Moorman	Mayor Pro Tem	City of Arvada
Renée Millard Chacon	Commerce City Councilmember	Commerce City
Ryan Schuchard	City Councilmember	City of Boulder
Sarah Parady	Denver Councilmember --- At-Large	Denver, City Council
Serena Gonzales-Gutierrez	Councilwoman At-large	Denver City Council

Sophia Mayott-Guerrero	City Councilor	Lakewood
Steve Child	County Commissioner	Pitkin County
Steven Douglas	Mayor	Commerce City
Susie Hidalgo-Fahring	Mayor Pro Tem	Longmont City Council
Taishya Adams	Councilmember	City of Boulder
Tim Barnes	City Councilor	Lafayette, Colorado