# Further Narratives Supporting 2025 Senate Bill 726

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**Dear Chair Sollman, Vice–Chair Brock Smith, and Members of the Senate Committee on Energy and Environment:**

Thank you for hearing public testimony on Senate Bill 726 on Monday. After attending and hearing the testimonies both pro and con, I am further in support of Senate Bill 726.

In testimony I submitted to you before the hearing, I outlined six narratives supporting SB 726, based upon years I spent closely observing a landfill (Coffin Butte Landfill, a regional landfill outside Corvallis, Oregon) as a member of the Benton County Disposal Site Advisory Committee. After hearing and reading public testimony, I have some further narratives to share with you supporting this bill.

**NARRATIVE #7: RELEASE FROM STRICTURES IMPOSED BY AN OBSOLETE METHODOLOGY**.
Once upon a time, having a person traverse the inhospitable terrain of a landfill's surface with a methane detector was the best available technology for detecting points where landfill gas was leaving the landfill. And so regulations were drawn up specifying that technological solution – not because a SEM walkover is easy (it's not) or cost-effective (it's not) or adequate (it's not), but because it was the only means available.

The SEM walkover method introduced some ideas or "expectations" about monitoring: that it would be conducted quarterly, for example. I point out that these expectations are artifacts of the walkover method, and can be and should be left behind as the State of Oregon enables new technologies to supply the critical information used to control landfill gas pollution.

The idea of having only one monitoring moment happen every three months was never desirable. (And actually, for any given 25' patch of ground on a landfill's surface, it has at most only one monitoring moment per *year*, under the SEM walkover method.) It's a compromise that arose directly from the cost and burden of the SEM walkover method – although more frequent monitoring would be better (and continuous monitoring would be the ideal), the industry objected to having it happen more often.

The technologies enabled by SB 726 upend the need to compromise public safety. There's at least one methane-detecting satellite over any particular landfill in Oregon every day, for example. Satellites cannot be expected to assess a landfill on any particular day – that's not their modus operandi. Their strength is to take snapshots of a landfill's entire operation cheaply and accurately on any day the weather permits.

When we look at satellite overflights as part of a package of monitoring technologies, for example, we can see them as establishing a critically useful baseline of data that can then be augmented with other technologies as necessary. Carbon Mapper's satellites, the Tanagers, can pinpoint problem areas that are then investigated and documented by drone. Likewise, drones can fill in during extended periods of weather.

The other strength of satellite or other airborne leak detection technology is that it effortlessly captures full-operations assessments for a landfill – it sees the whole picture, so to speak. Again, the idea of having "boundaries" to monitoring or "exempt areas" from monitoring are a pernicious and obsolete artifact of the inadequate SEM walkover method.

**NARRATIVE #8: RELEASE FROM AN EASY-TO-GAME SYSTEM / CREATING A RELIABLE DATABASE OF OPERATIONAL DATA FROM A LANDFILL**.
Dan Hurley, the Public Works Director from Lane County, provided us with invaluable testimony: having actually conducted SEM walkovers for Short Mountain Landfill, he assured us that walkovers are "a joke." This is a summary that I fully support, having looked in depth at years' worth of walkover data for Coffin Butte Landfill. As he said, SEM walkover results are easy to manipulate, and at Coffin Butte at least, the landfill operators have not resisted the temptation, as I showed in earlier testimony.

**You cannot build any sort of reliable or actionable picture of a landfill's operations from joke data.**

I invite the Committee members to look at the data for Forward Landfill, just east of Route 99E southeast of Stockton, California, freely available in the data portal at carbonmapper.org. (The direct URL is here.) Carbon Mapper has been gathering data on the Forward Landfill for over seven years, through overflights at first but now via satellite. This steady accretion of reliable (and non-gameable by the landfill owner) observations creates a reality-based assessment of this landfill, which is that it is a persistent super-emitter of greenhouse gases. If this landfill were to begin taking successful remediative action, we would see that too.

**NARRATIVE #9: RELEASE FROM THE CONTORTIONISM NECESSARY TO SUPPORT AN ONEROUS YET INADEQUATE STATUS QUO**.

As Dan Hurley said, SEM walkovers are a joke, and it seems to me there is nothing worse for State government than having its people go through the motions of trying to enforce regulations that are a joke and that everyone knows are a joke (but which persist because the joke is useful to landfill operators). This situation hurts the State, because the effects are no joke on the public. We rely on the State for protection of our common environment, and with the advent of the array of new monitoring technologies championed by SB 726, we can see (1) the data that supports our lived experience under the pollutive shadow of landfills, and (2) that other local and state governments are successfully integrating these new technologies to protect their communities. The public's perception of what's possible moves at the speed of science, and speaking for myself, I want our state to be in the vanguard of what's possible for environmental protection.

SB 726 can end the contortionism apparent in the landfill industry's position on the SEM walkovers, too – that it's OK to have the (onerous, ineffective) requirement for SEM walkovers, but it would be burdensome to transition to a (cheaper, effective) system that would allow the SEM walkover to enter the dustbin of history. Now that the SEM walkover is losing (has lost) its utility as a supposedly adequate monitoring method, it is becoming (has become) a pure burden on the landfill industry. As such, the industry can take action to end the requirement for SEM walkovers, as it sees fit. In the case of Coffin Butte Landfill at least, the landfill operator has been able to profit for years by deferring maintenance and remediation, so there is money available to support both SEM walkovers and the emerging new monitoring of SB 726, until such time as the SEM walkover is retired.

SB 726 is a necessary bill that will protect the public's health through enhanced methane monitoring, enabling landfill methane emissions to be more accurately measured and reported, and empowering action to be taken to fix leaks and reduce all landfill gas emissions. It will increase a landfill's ability to convert its landfill gas to energy more efficiently. The goals and proposed structure of SB 726 will enable Oregon state government to take a significant step forward to address the current shortcoming in protecting Oregon communities and the global climate from toxic landfill gas leaks. It will enable the State of Oregon to join with its public in taking measured and commonsense action to preserve our common airshed.

Thank you, Senator Gelser Blouin and Representative McDonald, for sponsoring this bill, and thanks to all who support it.

Respectfully submitted,

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