



GAIL FARBER  
CHAIR

LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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April 29, 2010

The Honorable John A. Perez  
State Capitol, Room 219  
Sacramento, CA 94249-0046

Dear Assembly Member Perez:

**ASSEMBLY BILL 2398 (AMENDED APRIL 14, 2010)  
PRODUCT STEWARDSHIP: CARPET**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **supports** Assembly Bill 2398 (AB 2398), which would require carpet manufacturers to develop a product stewardship plan to ensure the safe collection and proper management of carpet waste in California. The Task Force is an adamant supporter of product stewardship as a mechanism for protecting the public health and safety and the environment at the source, thereby addressing the highest rung of the waste management hierarchy, source reduction, which in turn reduces end-of-life management costs for local governments.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939, as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

According to the Department of Resources Recycling and Recovery (CalRecycle), carpet is one of the ten most prevalent material types in California's overall disposed waste stream accounting for an estimated 3.2 percent or approximately 1.3 million tons of carpet disposed of in the waste stream annually. Fortunately, carpet can be recycled, and new carpet can be manufactured from this recycled content. However, according to the United States Environmental Protection Agency, the lack of any established carpet recycling infrastructure is a barrier for consumers to responsibly dispose of used carpets.

If enacted, AB 2398 would shift the responsibility for the safe and proper disposal of carpet waste back towards their manufacturers and other entities involved in the product chain by requiring manufacturers to develop and implement a product stewardship plan with the ultimate target of collecting 95 percent of the carpets sold in California in the previous year.

Extended producer responsibility seeks to encourage manufacturers to redesign their products to minimize waste, such as excess packaging, and hold manufacturers accountable to collect and manage their products at the end of their useful life. By holding manufacturers accountable, the burden on local governments to manage product waste will be significantly lessened. The Task Force supports the establishment of meaningful producer responsibility programs in California to increase diversion of materials from landfills and protect the health and safety of all our residents.

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Therefore, the Task Force **supports** AB 2398. Should you have any questions, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147.

Sincerely,

*Margaret Clark*

Margaret Clark, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force and  
Council Member, City of Rosemead

PGT/RG:

cc: Assembly Member Martin Garrick, Minority Leader  
Each Member of the California Assembly Appropriations Committee  
Margo Reid Brown, Chief Deputy Director, CalRecycle  
Each Member of the Los Angeles County Legislative Delegation  
Each Member of the County of Los Angeles Board of Supervisors  
Each City Mayor in the County of Los Angeles  
California State Association of Counties  
League of California Cities  
League of California Cities, Los Angeles County Division  
California Product Stewardship Council  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Gateway Cities Council of Governments  
Each City Recycling Coordinator in Los Angeles County  
Each Member of the Los Angeles County Integrated Waste Management Task Force