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SOLID WASTE MANAGEMENT COMMITTEE/
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November 16, 2016

Kathy Frevert
Department of Resources Recycling and Recovery
1001 I Street
Sacramento, CA 95812

Dear Ms. Frevert:

**CALIFORNIA CARPET STEWARDSHIP PLAN 2017 – 2021,
SUBMITTED OCTOBER 15, 2016**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on Carpet America Recovery Effort's (CARE) new stewardship plan (Plan). The Plan, once approved by CalRecycle, would be the governing document for the State's carpet stewardship program as required under Assembly Bill 2398 (AB 2398, 2010). The Task Force commends CalRecycle's efforts and its work with the industry which has resulted in an improved Plan.

Nonetheless, to achieve a "continuous meaningful improvement in the rates of recycling and diversion of postconsumer carpet" (the foremost purpose of AB 2398), we offer the following recommendations for your consideration:

1. The new Plan has a recycling rate goal of 24% by 2020 and 26% by 2021. Under the current Plan the recycling rate goal was 16% by 2016 but the rates fluctuated in the last five years and ultimately declined. These goals continue to be extremely low considering the State's 75% diversion goal prescribed in AB 341 (2011). As indicated in our previous communications in 2013, 2014, and 2016, more aggressive goals need to be set to align this Plan with the State's waste management goals as the bill originally intended.
2. The newly incorporated Drop-off Collection Site program will promote participation statewide by establishing a goal of at least one public drop-off site in all 58 California counties by mid-2017. However, in comparison the Plan estimates that about 200 privately contracted collection sites have already been established to service retailers. Therefore, a higher goal must be considered proportionate and equitable to the needs of each County to facilitate accessibility and convenience to collection sites for the public.

3. The Plan acknowledges that most carpets are not easily visually identifiable; therefore, sorting is done by hand with a specialized infrared device to identify fiber material. The collectors encounter a labor intensive process and costly technology which reduces their productivity and output. The Task Force continues to recommend, as indicated in previous letters, that CARE institute a requirement that manufacturers stamp or label carpets in order to easily identify the materials they are made from, which will boost the ability to identify different types of material.
4. The Plan specifies that up to 15 percent of the funds in the program are allotted to subsidize Carpet as Alternate Fuel (CAAF) or Cement Kiln for waste that cannot be feasibly recycled or reused. Yet, the Plan also indicates that only about 7 percent of the funds are being used for that purpose leaving half of the funds allotted unused and unspoken for. Further, it is noted that currently 20 percent of gross collected material are disposed of in landfills, not to mention all of the carpet material not being collected and also disposed of in landfills. Thus, the total resulting recycling rate of carpet in 2015 was only 10 percent. Many challenges still exist in establishing markets for post-consumer carpet waste and improving the recycling rate. The Taskforce continues to recommend that CalRecycle should encourage the production of low-carbon fuels from non-recyclable carpet waste, thereby expanding markets for carpet waste and keeping this material out of landfills and benefitting the environment.
5. The additional grants, subsidies, and other financial incentives for collectors (which include waste haulers, sorters, processors, and manufacturers) are promising; however, it should be required that the financial incentives only be provided for collectors operating in California. Moreover, the Task Force hopes that more technology similar to Niaga's fully recyclable carpet will be incentivized to continue promoting the recycling of post-consumer carpet and resolve the "PET issue", which threatens the viability of the carpet recycling infrastructure.
6. Lastly, page 33 of the Plan stated, "As encouraged by CalRecycle and as prior experience has instructed, the Plan incorporates flexibility and elasticity to allow for quick and efficient reaction to market conditions to promote and take advantage of opportunities and react to challenges. The Program reserves the right to add, delete, increase, decrease, or otherwise modify incentives, subsidies or eligible recipients over the course of the Plan, as deemed necessary to achieve the stated performance goals and in response to market dynamics." The Task Force recommends that CalRecycle not allow this "blank check mechanism" and require that any modifications or deviations from the Plan be approved by CalRecycle (emphasis added).

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 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, 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.

We appreciate your consideration of our comments. If you have any questions, please contact Mr. Mike Mohajer, a Member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



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

cc: CalRecycle (Scott Smithline, Howard Levenson)
Robert Peoples, CARE
Each Member of the Los Angeles Board of Supervisors
Los Angeles County Chief Executive Officer
League of California Cities, Los Angeles County Division
Each City Mayor and City Manager in LA County
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Gateway Cities Council of Governments
Each Recycling Coordinator in Los Angeles County
Each Member of Los Angeles County Integrated Waste Management Task Force