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SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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January 17, 2014

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

Dear Ms. Frevert:

**CALIFORNIA CARPET STEWARDSHIP PLAN, VERSION 3.0  
DATED DECEMBER 23, 2013**

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) latest stewardship plan, Version 3.0 (Plan). The Plan, once approved, would be the governing document for the State's carpet stewardship program as required under Assembly Bill 2398 (AB 2398, 2010). The Task Force acknowledges CalRecycle's efforts and its work with the industry resulting in much improvement to the latest version of the Plan. However, as listed below, several strategies to achieve increased carpet diversion from landfills (the foremost purpose of AB 2398) remain absent.

1. Similar to the rural areas, the Plan needs to be expanded to provide incentive for local governments and contracted haulers in the urbanized areas to collect and haul carpet to processors and/or recyclers. Otherwise, as indicated in our previous communications, it would cost less to send collected carpet to landfills instead of recycling facilities.
2. Given the long term challenges in establishing markets for post-consumer carpet waste, 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.
3. Carpet collectors are unable to readily segregate recyclable carpets from unrecyclable carpet, which inhibits the productivity of their businesses. As indicated in the Plan, technology exists in the form of infrared sensors that can identify carpet fiber. However, the sensors are cost-prohibitive and are thus not widely available to collectors. The Task Force recommends 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 separate and recycle different types of carpet.

4. The Plan has a recycling goal of 16% for 2016 with an “aspirational goal” of 24% by 2020. These goals are extremely low considering the State’s 75% diversion goal prescribed in AB 341. As indicated in our letter of November 28, 2013, higher goals need to be set to align this Plan with the State’s waste management goals as the bill originally intended.

The substantial increase in funds dedicated to education and outreach is encouraging. Moreover, the Task Force appreciates that the Plan does attempt to address the problematic issue the increased use of Polyethylene Terephthalate (PET) in carpet poses. The new incentives for PET carpet as well as the grant program and funding for research will hopefully resolve the “PET issue”, which threatens the viability of the carpet recycling infrastructure.

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.

If you have any questions, please contact Mr. Mike Mohajer of the Task Force at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or (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

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cc: Caroll Mortensen, CalRecycle  
Howard Levenson, CalRecycle  
Robert Peoples, CARE  
Heidi Sanborn, California Product Stewardship Council  
Each Member of the Los Angeles County Integrated Waste Management Task Force