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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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June 27, 2013

The Honorable Loni Hancock  
California State Senate  
State Capitol, Room 2082  
Sacramento, CA 95814

The Honorable Lou Correa  
California State Senate  
State Capitol, Room 5052  
Sacramento, CA 95814

Dear Senator Hancock and Senator Correa:

**SENATE BILL 254 (AMENDED MAY 28, 2013) – OPPOSE UNLESS AMENDED  
SOLID WASTE: USED MATTRESSES: RECYCLING AND RECOVERY**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) is a longtime supporter of efforts to promote product stewardship but must respectfully **oppose** Senate Bill 254 (SB 254) **unless it is amended** to address the following issues/concerns:

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 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.

The Task Force is supportive of the overall effort to establish a product stewardship framework for mattresses in California. However, we must oppose the bill unless it is amended to address certain key issues, as described below. These key issues may undermine the intent of the bill by making it more difficult for the program to be

financially or operationally viable. If not addressed, these issues would also set a negative precedent for extended producer responsibility (EPR) measures.

#### Cost of Recovery and Recycling

The Task Force respectfully requests that SB 254 be amended to require producers to internalize the cost of recovery and recycling and eliminate fees on consumers to finance the mattress stewardship program. Incorporating the recovery and recycling costs into the product cost will encourage manufacturers to consider the entire lifecycle costs of their product and rethink their product design.

#### Stewardship Organization Governance

The internal governance structure of the mattress stewardship organization should be expanded to include representation by local governments and the solid waste industry. Involving all impacted stakeholders will ultimately lead to a stewardship plan that more adequately addresses the environmental, social, and economic impacts of the proposed mattress stewardship program.

#### Solid Waste and Recycling Facility Participation

SB 254 appears to require that all solid waste facilities accept used mattresses for recycling, and the bill specifies that certain costs be reimbursed. Because not all solid waste facilities are capable of handling bulky items such as mattresses, the Task Force suggests that facilities be allowed to “opt-in” to the program. Solid waste facilities and recycling facilities that are able to handle mattresses can become “participating” facilities and be reimbursed for their costs. In addition to what is currently specified in the bill, these costs should include disposal costs in the event that contaminated mattresses cannot be recycled or a solid waste facility runs out of storage space and there are not yet enough mattress recyclers available.

#### Preventing Bedbug Infestations

SB 254 attempts to address the issue of contamination by granting a retailer or third party contractor the right to refuse to pick up a used mattress if they determine it is contaminated. However the bill does not specify what qualifies as contamination or require the development of any proper handling and sanitation procedures to ensure that bedbugs do not migrate to new mattresses, homes, or effect public health and safety. The unfortunate result of leaving this problem unaddressed could be the collapse of the mattress recycling market.

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The Task Force has a long history of supporting EPR efforts; however, we are **opposed** to SB 254 **unless amended** as discussed above. 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: Assembly Member Chesbro, Chair, Assembly Natural Resources Committee  
Each Member of the Assembly Natural Resources Committee  
Each Member of the County of Los Angeles Board of Supervisors  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
San Fernando Valley Council of Governments  
Gateway Cities Council of Governments  
Westside Cities Council of Governments  
Each City Mayor and City Manager in the County of Los Angeles  
Each Member of the Los Angeles County Integrated Waste Management Task Force