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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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August 22, 2012

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

Dear Senator Hancock:

**SOLID WASTE: USED MATTRESSES: RECYCLING AND RECOVERY
POSITION: OPPOSE UNLESS AMENDED**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) **opposes unless amended** Senate Bill 1118 (SB 1118) as amended on August 13, 2012. If enacted, manufacturers of mattresses sold in California will be responsible for the collection and recycling of waste mattresses generated by consumers purchasing a new mattress consistent with a plan approved by CalRecycle (emphasis added). SB 1118 also requires that the plan implemented by manufacturers of mattresses sold in California must be capable of recycling at least 75% of waste mattresses generated in California by January 1, 2020, and thereafter.

The Task Force commends your efforts in authoring SB 1118. We are fully supportive of extended producer responsibility efforts in order to reduce the burden on local governments in managing solid waste while meeting state diversion mandates. However, the Task Force has a number of concerns with SB 1118 as listed below resulting in our current position. It is our goal to work together on the resolution of the listed concerns at your convenience.

- Local governments are responsible for the protection of their citizens' health and safety as well as the management of solid waste, including post-consumer mattresses, generated by their residents and businesses. It is our understanding that the original intent of SB 1118 was to provide relief to local governments from costs associated with picking-up and managing illegally disposed mattresses. However, the current version of SB 1118 lacks any provisions that specify how local governments will be reimbursed after collecting and managing illegally disposed mattresses.

- The proposed “voucher” system is not workable for local governments collecting illegally dumped waste mattresses. It is also difficult to require a consumer to save the voucher provided at the time of purchase of the new mattress until disposal of said mattress. The system must be convenient for customers to use and the voucher system will not accomplish that goal.
- The definition of “retailers” exempts retailers that sell mattresses through the internet. We find no reason for such an exemption, and it needs to be deleted.
- The proposed definition for “manufacturers” indirectly includes mattress “renovators”/“remanufacturers,” and thus, they would be also required to financially participate in the “waste mattress recycling cost.” Renovators should be exempt from the SB 1118 requirements.
- The proposal would require each solid waste facility operator to implement a data collection system to assist CalRecycle with their enforcement of the Mattress Recovery and Recycling Act. We believe that is the responsibility of the manufacturers to provide the required data and not the solid waste facility operators.
- The proposal requires 75% of waste mattresses generated in this state to be managed through recycling by 2020. The Task Force does not see any justification for the exclusion of source reduction and other diversion activities to divert waste mattresses from being disposed in landfills. We are recommending that provisions of Subdivision 42988(b), Paragraphs (6), Subparagraphs (A), (B), and (C) be expanded to read “..., **source reduce**, recycle **and/or divert** not less than...” (Recommended additions are shown in bold).

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.

The Honorable Loni Hancock
August 22, 2012
Page 3

The Task Force **opposes** SB 1118 **unless** it is **amended** to address our concerns. We are looking forward to working with you and your staff on the resolution of the stated concerns at your convenience.

Should you or your staff have any questions regarding this matter, please contact Mr. Mike Mohajer of the Task Force at (909) 592-1147 or MikeMohajer@yahoo.com.

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: Each Member of the California State Assembly
John A. Perez, Speaker of the Assembly
Darrell Steinberg, President Pro Tem
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 Board of Supervisors
Each Member of the Los Angeles County Integrated Waste Management Task Force