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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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June 22, 2017

The Honorable Bob Wieckowski, Chair  
Senate Committee on Environmental Quality  
State Capitol, Room 2205  
Sacramento, CA 95814

Dear Senator Wieckowski:

### **SUPPORT AND AMEND ASSEMBLY BILL 1158 (CHU) CARPET RECYCLING**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) is pleased to **support** Assembly Bill 1158 (AB 1158), as amended on, June 21, 2017 **and respectfully request an amendment to address the concerns expressed in this letter**. If enacted, AB 1158 would create a multi-stakeholder advisory committee that would be required to make recommendations to the carpet stewardship organization(s) on their stewardship plan(s) and require that the stewardship plan(s) include a process for carpet stewardship organization(s) to respond to the recommendations. Among other things, this bill would also establish a 24% recycling rate goal by January 1, 2020 and prohibit the carpet stewardship organization from expending any funds for activities related to the incineration or disposal of postconsumer carpet, and litigation against the State.

AB 1158 is a step in the right direction to improve the State's carpet stewardship program. Currently the carpet industry's stewardship organization, the Carpet America Recovery Effort (CARE), is the sole organization appointed by the State to run the carpet stewardship program. CARE submits plan updates to the Department of Resources Recycling and Recovery (CalRecycle) for approval, to demonstrate how the industry will achieve the current carpet recycling goal which in current statute is "continuous meaningful improvement". However, in December of 2016, CalRecycle disapproved CARE's Proposed Plan for 2017-2021, and had already found the Program failed to successfully implement the goals for six continuous years. Certainly, there is a critical need for improvements to the original statute as there has been no improvement in carpet recycling since the development of the carpet stewardship program.

As indicated by CalRecycle, CARE has not “sufficiently addressed reasonable consumer access to recycling services in critical population centers in California, nor made sufficient effort to “establish and grow critical California infrastructure for long-term carpet recycling.” CalRecycle’s disapproval of the Plan also indicates that CARE has not taken all possible steps to boost market development, stating that “the Plan neglects a key market development strategy that is within the control of the carpet manufacturers...which is to increase their own use of post-consumer carpet materials in manufacturing new carpet.”

The Task Force is a strong supporter of product stewardship, a member of the California Product Stewardship Council (CPSC), and was actively involved to ensure the enactment of Assembly Bill 2398 (AB 2398, 2010) which enacted the carpet stewardship program. Unfortunately, it’s evident that the statute is deficient as the outcome has been much less than expected, and AB 1158 will allow for the needed improvements to the carpet stewardship program.

We respectfully request that among the considered amendments to the statute:

- Stronger recycling rate goals be established by CalRecycle to align with the State’s waste management goals.
- In addition to requiring at least one take-back location in each County, take-back locations should be proportionate to the population of each County to facilitate accessibility and convenience to collection sites for the public.
- The bill should stipulate financial incentives to further develop the market for post-consumer carpet in the State such as State procurement requirements for carpet made of a minimum percentage of recycled content
- The bill should consider requirements for carpet manufacturers to use more recyclable materials with adequate labeling to differentiate the materials.

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

Based on the foregoing, the Task Force **supports** AB 1158 and **respectfully requests an amendment to address the concerns expressed in this letter**. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at [MikeMohajer@yahoo.com](mailto: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

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cc: Assembly Members Kansen Chu, and Mark Stone  
Each Member of the Senate Committee on Environmental Quality  
Committee Chief Consultant, Rachel Machi Wagoner  
Director Scott Smithline, CalRecycle  
California State Association of Counties  
League of California Cities – Los Angeles County Division  
Each member of the Los Angeles County Board of Supervisors  
Sachi A. Hamai, Los Angeles County Chief Executive Officer  
San Gabriel Valley Council of Governments  
South Bay Cities 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 City Recycling Coordinator in Los Angeles County  
Each Member of the Los Angeles County Integrated Waste Management Task Force