



**SF Environment**

**Our home. Our city. Our planet.**

A Department of the City and County of San Francisco



EDWIN M. LEE  
Mayor

MELANIE NUTTER  
Director

June 24, 2013

Caroll Mortensen, Director  
CalRecycle  
1001 I Street  
Sacramento CA 95814

Dear Ms. Mortensen:

CARE's revised Carpet Stewardship Plan (May 31, 2013 version) sets a recycling goal of 16% of discarded carpet by 2016 and does not commit to using incentive reserve funds to promote carpet recycling market development. The City and County of San Francisco considers this unacceptable. Not only does it fall far short of the landfill diversion targets established by San Francisco but for the State of California as well. We ask that CalRecycle reject the Plan because it does not meet the requirement in AB 2398, to make "continuous and meaningful improvement" to carpet recycling.

San Francisco has adopted an ambitious zero waste goal by 2020 and our latest numbers show we are diverting 80% of material from landfill. As you are well aware, Governor Jerry Brown recently signed legislation increasing the state's overall recycling rate to 75% by 2020. Discarded carpet represents significant tons of waste materials in California landfills, and a 16% recycling rate – a rate the industry itself has shown it is already meeting - does nearly nothing to assist either San Francisco or the State of California to reach their long-term landfill diversion goals. Any goal should be challenging and ambitious, not a mere token effort.

One of the goals under AB 2398 is to "incentivize the market growth of secondary products made from postconsumer carpet" and \$0.05 per square yard has been assessed since July 1<sup>st</sup>, 2011, which has amounted to an impressive \$4M, to fund a recycling incentive program. Unfortunately, this money is sitting idle and CARE is not committing to any incentive action in their Plan. CARE should be providing a market development incentive payment to build end markets for such products as carpet cushion.

We strongly encourage CalRecycle to not approve CARE's Carpet Stewardship Plan until they commit to using stewardship funds to bolster market development for carpet recycling and establish substantially higher recycling goals, at a minimum 25% by 2016 and higher rates, such as 50% a few years later.

Sincerely,

Melanie Nutter  
Director

cc: Howard Levenson, CalRecycle  
Kathy Fervert, CalRecycle  
Bob Peoples, CARE