



CHAIR – MICHAEL KOBSEFF, SISKIYOU COUNTY

VICE CHAIR – BOB WILLIAMS, TEHAMA COUNTY

EXECUTIVE DIRECTOR – GREG NORTON

TECHNICAL ADVISORY GROUP (TAG)

TAG CHAIR – KRISTINA MILLER, TEHAMA COUNTY

TAG VICE CHAIR – JIM MCHARGUE, AMADOR COUNTY

PROGRAM MANAGER – MARY PITTO

June 25, 2013

Ms. Kathy Frevert  
Materials Management and Local Assistance Division, CalRecycle  
1001 I Street  
PO Box 4025, MS 13A  
Sacramento, CA 95812

RE: Revised California Carpet Stewardship Plan

Dear Ms. Frevert

On behalf of our twenty-two member counties, the Rural Counties' Environmental Services Joint Powers Authority (ESJPA) would like to express our appreciation to both the Department of Resources Recycling and Recovery (CalRecycle) and Carpet America Recovery Effort (CARE) for your combined efforts to implement AB 2398, the carpet stewardship statute. We would also like to take this opportunity to thank CalRecycle and CARE for recognizing the challenges rural counties face and working with our organization and the six counties participating in the rural county pilot project to implement opportunities for carpet recycling in our rural areas.

The Product Stewardship for Carpet Regulations requires:

*Description of how each consumer that pays a carpet stewardship assessment, **including but not limited to those in rural areas**, will be provided reasonably convenient opportunity(ies) **in each county** to manage their post-consumer carpet.*

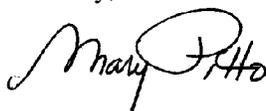
We recognize that this is a new program, and as such we are all in a learning process. We are grateful to the pilot project counties (Calaveras, Del Norte, Humboldt, Plumas, Siskiyou, and Tehama) that went to great efforts to help make carpet recycling a successful program and gain experience that will aid in further expansion to other areas. We expect that it will take time for full implementation and are committed to continue our working relationship with CalRecycle and CARE to expand this program so that all rural counties will have convenient and reasonable access to carpet recycling. To this end, the ESJPA requests that the following edits are considered to provide more certainty and still allow flexibility in the remaining rural counties.

- ~~Go~~ *Increase* from *the* current 6 to 10 rural counties *to be* operational by January 2014, *using the existing model for the rural county pilot project. Any changes to the existing model in the future must be approved by the county and CalRecycle.*
- ~~Go~~ *Increase* from 10 to 16 rural counties (~~currently estimated to be 22 counties in total~~) *to be operational* by July 2015. *Working with CalRecycle, the ESJPA, county representatives, and industry stakeholders, other business models may be explored and implemented that result in reasonably convenient opportunities that are acceptable to the counties and CalRecycle.*

- Implement any remaining rural county expansion, as experience and interest dictate, between June 2015 and June 2016. Pending further analysis there may be a few instances of one rural county serving an adjacent county due to extremely low volumes and/or no carpet retail operations in the county. CARE expects this will be the exception and do not anticipate more than 2 or 3 such instances at most.
- Develop new marketing and communication materials and public outreach messaging to inform rural county residents, and local personnel at the collection sites.
- CARE will fund the cost of transportation in the rural county pilot project model counties and make resources available to aid in for set up, signage, and on-going logistics. CARE will fund the cost of any other business models that are developed and approved by CalRecycle and each county.

Again, the ESJPA would like to express our gratitude to you and all the staff for your continued support for rural county participation in carpet recycling. We will continue to work with CalRecycle and CARE staff in outreach efforts and implementation of the carpet stewardship program. Thank you for your consideration.

Sincerely,



Mary Pitto  
ESJPA Program Manager

cc: Caroll Mortensen, Director, CalRecycle  
Howard Levinson, Ph.D., Deputy Director, CalRecycle  
Fareed Ferhut, Materials Management and Local Assistance Division, CalRecycle  
Bob Peoples, PH.D., Executive Director, CARE  
ESJPA Board of Directors  
Rural County Representatives of California (RCRC) Board of Directors  
Heidi Sanborn, Executive Officer, CA Product Stewardship Council