



THE CITY OF SAN DIEGO

November 26, 2013

Attention: Kathy Frevert
Department of Resources Recycling and Recovery
1001 I Street
PO Box 4025, MS 13A
Sacramento, CA 95812
Submitted via email: carpet@calrecycle.ca.gov

Dear Ms. Frevert:

RE: Comments on Revised California Carpet Stewardship Plan

The City of San Diego Environmental Services Department (ESD) appreciates the opportunity to comment on the revised California Carpet Stewardship Plan that was submitted to CalRecycle on October 28, 2013, by the Carpet America Recovery Effort (CARE). ESD supports the end-of-life recycling and management of carpet. However, after careful review of this plan, ESD feels the following concerns need to be addressed prior to approval:

1. Increase the \$0.05 fee per square yard to a differential fee schedule that makes recycling commercially viable, based upon the type of carpet material, (i.e., polyester or PET from residential carpets). Currently, the fee is too low to create a market incentive for more recycling facilities in San Diego to accept carpet.
2. Allow funds to be used to develop recycling infrastructure. While the City has a Construction and Demolition Ordinance, contractors not willing to travel to other areas outside of San Diego to recycle carpet, often bring it for disposal at the Miramar Landfill. The City's 2013 waste composition study showed over nine million pounds of carpet and carpet padding was disposed of at Miramar Landfill.

If you have any questions or comments, please contact Andrea Altmann, Environmental Specialist at (858) 492-5016.

Sincerely,

Chris Gonaver
Director

CG/aa

Cc: Bob Peoples, CARE
Howard Levenson, CalRecycle



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