



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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November 27, 2013

IN REPLY PLEASE
REFER TO FILE: **EP-4**

Ms. Kathy Frevert
Department of Resources Recycling and Recovery
1001 I Street
Sacramento, CA 95812-2828

COMMENTS ON REVISED CARPET STEWARDSHIP PLAN

Dear Ms. Frevert:

The County of Los Angeles, Department of Public Works (Public Works) is the lead County agency advising the Los Angeles County Board of Supervisors on waste management issues. Public Works is responsible for the development and implementation of long-term waste management plans for the County which includes many award-winning waste diversion programs for businesses and residents and a conversion technology development program. Public Works is a consistent supporter of extended producer responsibility and operates one of the nation's largest household hazardous waste collection programs serving residents Countywide.

Public Works appreciates this opportunity to comment on Carpet America Recovery Effort's (CARE) revised Carpet Stewardship Plan (Plan) submitted to the Department of Resources Recycling and Recovery (CalRecycle) on October 28, 2013. As an affected stakeholder, Public Works has a vested interest in the success of the State's carpet stewardship program established under Assembly Bill 2398 (AB 2398, Perez, 2010). As such, we recommend that CalRecycle **not approve the plan** until CARE has revised it to address key issues that continue to hamper the success of the State's carpet stewardship program, as described in more details below:

- The Plan does not properly address the increased use of recycled Polyethylene Terephthalate (PET) for carpet fiber. It is estimated that PET fiber will account for more than 50 percent of carpet fiber by 2016. Although PET is recyclable, once it has been turned into carpet fibers it is difficult to recover, and commercially viable markets and infrastructure have not been established. As a result PET carpet most often ends up in landfills. The Plan needs to do more to address the issue of PET carpet both in the design and the post-consumer processing. Carpet

manufacturers should take responsibility for the lifecycle impacts of their product.

- CalRecycle should require that the Plan provide for adequate funding to ensure carpet can be cost-effectively and conveniently collected and recycled throughout the State. The carpet recycling infrastructure within California is on precarious ground as evidenced by the closure of several in-State carpet recycling companies despite the enactment of AB 2398 in 2010. The Plan lacks mechanisms that would enable CARE to utilize substantial unused funds to encourage development and expansion of carpet recycling infrastructure. If there are no recyclers to accept carpet, any carpet that is collected will be sent to disposal.
- There are many challenges in establishing stable markets for post-consumer carpet waste. As a result, far too much post-consumer carpet is still ending up in landfills. CalRecycle can help alleviate this problem by placing greater emphasis on the production of low-carbon fuels from non-recyclable carpet waste.
- The Plan estimates that 98 percent of Californians have access to carpet recycling. However, the Certified Collector Finder on CARE's website lists a total of four collectors in Los Angeles County, one of which according to facility staff stopped collecting carpet at least eight months ago. Three certified collectors cannot accommodate the largest and most populous county in the nation with a population of over 10 million. Residents in some parts of the county would have to drive more than 50 miles to reach a collection facility. In order for the program to become a success, convenient collection locations must be available to all residents.
- It is cost-prohibitive for local governments and contracted haulers that pick up carpet under bulky item pickup programs to deliver carpet to carpet collection/processing facilities. We suggest expansion of the Rural County Collection Program to urban counties which will afford local bulky item programs the flexibility and resources to deliver post-consumer carpet to collection facilities.

California's Carpet Stewardship Program must benefit everyone who pays assessment fees and for this reason we urge CalRecycle to **not approve** the Plan as currently drafted. Public Works appreciates this opportunity to voice our primary concerns with

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the Plan and looks forward to working with CARE, CalRecycle, and other stakeholders to ensure the Plan is updated to meet the goals of AB 2398.

If you have any questions, please contact Mr. Coby Skye at (626) 458-3550, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

GAIL FARBER
Director of Public Works



for
PAT PROANO
Assistant Deputy Director
Environmental Programs Division

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P:\Sec\Carpet Plan Comments DPW

cc: Bob Peoples, CARE
Howard Levenson, CalRecycle
Heidi Sanborn, California Product Stewardship Council