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Sent: Tuesday, March 24, 2015 8:58 AM

To: Mattress EPR

Subject: Comment on Proposed Mattress Regulations

We now have three EPR programs in various stages in California – paint, carpet and mattresses. All of these are in place in Santa Cruz County, and all share a similar flaw.

Local governments operating recycling and solid waste facilities are a critical link in all of these programs. While we are pleased to see new approaches to keeping these materials out of the landfill, we still have significant costs for handling these materials under the new EPR programs. But in every case, what we are offered to cover our costs has been inadequate. Because these are statewide programs, the compensation to local government has been presented to us as a fait accompli – take it or leave it. We have no leverage, no standing to negotiate, and no option but to take a loss on every gallon of paint, every roll of carpet, and as things stand, every mattress.

We need a process for establishing fair compensation for local governments that is overseen by CalRecycle, not by the manufacturers. To them, we are just another cost, to be kept as low as possible by any means possible. And once in place, there is no mechanism to evaluate or ever increase this amount.

I urge CalRecycle to take this issue seriously before we launch yet another program that is little more than a burden to local government.

Thank you,

Tim Goncharoff
County of Santa Cruz