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September 8, 2011

Fareed Ferhut
Materials Management and Local Assistance Division
California Department of Resources Recycling and Recovery
PO Box 4025
Sacramento, CA 95812-4025

RE: Proposed Regulation for Product Stewardship for Carpets

Dear Mr. Ferhut:

On behalf of our twenty-two member counties, the Rural Counties' Environmental Services Joint Powers Authority (ESJPA) would like to express our appreciation to the Department of Resources Recycling and Recovery (CalRecycle) for their efforts to develop regulations to implement AB 2398, the new carpet stewardship statute. We wish to thank staff for their outreach efforts to solicit input from our rural counties.

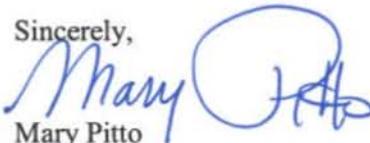
The ESJPA supports the proposed regulations and believes the language in Section 18943 (a)(5)(E) is a particularly important aspect of the criteria for approval to our organization:

“Description of how each consumer that pays a carpet stewardship assessment, including but not limited to those in rural areas, will have an opportunity to conveniently and properly manage their post-consumer carpet.”

Waste management in rural areas is economically challenging due to the economy of scale and distances to markets. Since all carpet purchasers now pay into the carpet stewardship program, it is imperative that our rural areas receive a benefit from the program and are able to provide opportunities for carpet recycling at no additional cost to our counties. The ESJPA finds the above provision imperative to that effort.

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

Sincerely,


Mary Pitto
Program Manager

cc: ESJPA Board of Directors
Regional Council of Rural Counties (RCRC) Board of Directors