



December 14, 2018

Scott Smithline, Director
CalRecycle
1001 I St
Sacramento, CA 95814

Re: CARE Submission of Carpet Stewardship Plan 2018-2022 with New Chapter Zero

Dear Director Smithline:

Carpet America Recovery Effort (“CARE”) submits to CalRecycle this 2018-2022 carpet stewardship Plan with the new addition of “Chapter Zero” in response to the findings issued by CalRecycle in its October 16, 2018 conditional approval of CARE’s Plan previously submitted on August 17, 2018 (Request for Approval, or “RFA”). CARE has worked intensively and to the best of its ability to address the all issues raised by CalRecycle in the conditional approval, and has been in close communication with CalRecycle and interested stakeholders while preparing Chapter Zero. CARE also accepted most recommendations of the Advisory Committee and made corresponding revisions to Chapter Zero. The Plan, including Chapter Zero, addresses the issues raised by CalRecycle, and CARE’s Plan merits approval by CalRecycle.

CARE has agreed to implement the conditions in CalRecycle’s latest RFA even though specific requests therein extend beyond the requirements of the Carpet Stewardship Laws. CARE has done so as a show of CARE’s good faith in carrying out the Plan and strong desire to work productively with CalRecycle to achieve plan approval.

As outlined in Chapter Zero, CARE has committed to providing more information with the goal of achieving increased transparency into how CARE’s Plan fulfills the statutory requirements. In particular, CARE has made additional commitments to address concerns regarding how the assessment is set and, to the extent practicable, has committed to sharing more information with CalRecycle and engaging an auditor to review both the Cost Conversion Model and Subsidy Justification Model. CARE has also committed to undertaking studies, which will assist CARE in preparing future Plans and revising this Plan, as appropriate.

CARE’s extensive Plan and additional commitments in Chapter Zero fully comply with the statutory and regulatory requirements of the Carpet Stewardship Laws. This Plan is also fully funded for execution toward meeting or exceeding the statutory goal a 24% recycling rate by

January 1, 2020, and all other requirements. CARE looks forward to achieving approval for its 2018-2022 Plan and working with CalRecycle on its implementation.

Respectfully submitted,

A handwritten signature in cursive script that reads "Robert Peoples".

Robert Peoples, Ph.D.
Executive Director
Carpet America Recovery Effort (CARE)
100 South Hamilton Street
Dalton, Georgia 30722