

**From:** Don Franco Jr.  
**To:** [Beckner, Heather@CalRecycle](mailto:Beckner,Heather@CalRecycle)  
**Subject:** Comments Regarding the Baseline  
**Date:** Tuesday, November 21, 2017 9:01:06 AM

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Good Morning, Please see below my comments to the Director.

Dear Director Smithline,

Thank you for allowing me to submit my comments regarding the mattress and recycling baseline amounts. My concern with the baseline is Table 1, and the section on renovation, as shown on the Request for Approval. The number of renovated units being set at 150,000 annually in my opinion, and as noted by CalRecycle is exceptionally low and under-reported. CalRecycle states that it believes that renovation is under-reported and makes it a point to note that "only 6 of 56 renovators reported" totals for 2016. It also states that CalRecycle is increasing efforts to locate and get non-reporting renovators to report. The table also shows that while there is an annual increase for recycling of mattresses there is no increase for the quantity to be renovated. It is also noted in the section that MRC is concerned that they have no control over how many units are renovated in the state but CalRecycle notes that MRC has the opportunity to work with renovators to achieve the states hierarchy goals.

I urge you to reconsider setting a baseline for renovation using 2016 numbers, and to hold off until 2017 totals can be obtained. I commend CalRecycles efforts to locate and inspect non reporting renovators and once these efforts have started it will almost certainly result in more than 6 reporters. The legislation states that current legal renovation is not to be undermined or adversely impacted, but, by starting with an exceedingly low, underreported number, and not increasing annually would make it easy for MRC to argue that renovators are not being impacted as long as it can be shown that only 150,000 pcs were renovated annually. While MRC may not control how many mattresses are renovated, they can certainly control how many used mattresses are being sent to renovators, and to my knowledge MRC has not reached out to any renovators regarding any collaboration efforts. The objective of the law is to keep mattresses out of our landfills and off our streets while following the states hierarchy and as I have stated in prior comments, encouraging recyclers to work with renovators will help achieve this goal.

In my opinion, CalRecycle should not use ANY 2016 baseline numbers regarding renovation and make it a priority to get accurate 2017 numbers from as many renovators as possible before setting a baseline. In addition, encourage MRC to work with licensed renovators to ensure that renovators are not negatively impacted.

*Don Franco Jr.*

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