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LOS ANGELES COUNTY
SOLID WASTE MANAGEMENT COMMITTEE/
INTEGRATED WASTE MANAGEMENT TASK FORCE
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August 31, 2017

Mr. Scott Smithline, Director
California Department of Resources Recycling and Recovery (CalRecycle)
P.O. Box 4025
Sacramento, CA 95812-4025

Dear Mr. Smithline:

PROPOSED MATTRESS RECYCLING BASELINE AMOUNTS AND GOALS

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates this opportunity to comment on the proposed Mattress Recycling Baseline and Goals conducted on August 15, 2017.

The Task Force has been a long-time supporter of balanced approaches for the management of solid waste if the result includes diversion of valuable resources from landfills, decreased costs for local governments to manage the waste, and protecting our environment to improve the quality of life for the California's citizens.

The intent of the August 15, 2017, Cal Recycle's Workshop was to provide stakeholders with the State Mattress Recycling Baseline & Goals and to receive feedback on the proposed mattress recycling baseline amounts and recycling goals. The proposed recycling baseline amounts and goals were based on actual and projected 2016, numbers reported by mattress organizations, mattress recyclers, and mattress renovators. It is our understanding that the proposed mattress baseline amounts and goals for mattress recycling, mattress renovation, and public access to recycling facilities (convenience) are (1) set the baseline amount for renovated mattress at 150,000 units with a goal of maintaining this amount through 2020, (2) set the baseline amount for recycled units at 955,059 mattresses with goals to increase this baseline amount by 30 percent in 2017, 15 percent in 2018, 9 percent in 2019, and 9 percent in 2020, and (3) set the number of Counties in 2016 baseline of 43 Counties out of a

total of 58 Counties as the baseline at 43 for the number of California Counties that have access to recycling facilities and mattress drop-off locations with goals to increase the number of Counties to 49 in 2017, and 58 in 2018.

The Task Force believes the mattress recycling baseline and goals are consistent with current and upcoming recycling regulations. However, the Task Force believes that CalRecycle should also implement a robust education and enforcement program for mattress organizations, mattress recyclers, and renovators. The Task Force estimates that up to 60 percent of mattress organizations who are required under SB 254 to report sales and recycling numbers do not report. This has been substantiated by CalRecycle at the August 15, 2017, Workshop in Sacramento where it was reported that out of the 13 recyclers, 56 renovators and 509 solid waste facilities identified as potential reporters only 11 recyclers, 6 renovators, and 332 solid waste facilities submitted their annual reports. In addition, the Task Force believes legislation should be introduced to address the amount of Latex Foam and Memory Foam going to landfills and the lack of secondary facilities and markets for these materials. The Task Force recognizes the need to encourage the development of secondary markets for latex foam, memory foam, and wood to improve the collection and recovery rate for recycling used mattresses.

Finally, the Task Force strongly believes that local governmental agencies need to be fully reimbursed for the full cost of illegally dumped mattresses/box springs collection and delivery to an authorized collection facility.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

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We appreciate your consideration of our comments and look forward to continue working closely with your staff during development of the State Mattress Recycling Baseline and Goals.

If you have any questions, please contact Mr. Mike Mohajer, a Member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,



Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Council Member, City of Rosemead

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cc: CalEPA (Matt Rodriguez)
CalRecycle (Ken DeRosa, Howard Levenson, Heather Beckner)
California State Association of Counties
League of California Cities
Each Member of the Los Angeles Board of Supervisors
Los Angeles County Chief Executive Officer
League of California Cities, Los Angeles County Division
Each City Mayor and City Manager in LA County
San Gabriel Valley Council of Governments
South Bay Cities Council of Governments
Gateway Cities Council of Governments
Each Recycling Coordinator in Los Angeles County
Each Member of Los Angeles County Integrated Waste Management Task Force