CARE California Carpet Stewardship Program

Convenient Collection for Flooring Professionals
Final Report & Implementation Plan

June 30, 2021

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CONVENIENT COLLECTION INTRODUCTION

As a part of the California Carpet Stewardship Program, Revised Carpet Stewardship Plan 2018-2022 Chapter 0 Requirements, CARE completed and presented a Convenient Collection Study (September 1, 2019) which was carried out by Cascadia Consulting Group. Of the Plan's Eight Performance Goals, included was "6. Increase the collection convenience for the recycling of post-consumer carpet and increase the collection of post-consumer carpet for recycling," as called for in the Carpet Stewardship Law [Public Resources Code Section42972(a)(2)(B)].

As noted in the 2018-2022 approved Plan, the Program has adopted a three-pronged approach:

1. To maintain and expand the current strategic combination of offering a minimum number of drop-off sites per population or geographic area.
2. Offering subsidies to collector/sorters to support private pick-up collection service.
3. To complete a convenient collection study…which will inform future convenient collection and set refined goal(s) to be adopted over the course of the Plan to guide CARE in appropriately allocating collection funds to those areas most lacking coverage.

The Convenient Collection Study completed by Cascadia included the following:

- Stewardship Program Research including information on a variety of product stewardship programs in California and elsewhere that could offer insight into convenience.
- Survey Research with Key Audiences which included: small- and medium-sized carpet retailers; carpet installers at supply houses; commercial carpet installers; carpet installer groups for big box and large retailers; remodeling, demolition, and C&D (construction and demolition) contractors; and residents.
- Convenient Collection Standards Options which included potential approaches for convenient collection, including convenience factors, frameworks for considering convenience and potential standards with spatial analysis. Convenience factors included: proximity, cost, access, and ease (e.g., preparation requirements for carpet recycling) – all of which included stakeholder input.

A clarifying finding and factor for evaluating convenience for carpet recycling was confirmation that the majority of tear-out carpet is handled by flooring professionals and contractors rather than the general public. This finding is important as a defining convenience evaluation factor that differs from other material types such as mattresses, CRTs, tires, beverage containers, paint, and batteries – all of which are generally more

easily transported and/or moved by the general public. Conversely, installed carpet is a building and home improvement type product which is considered a "fixture" to property.

CARE's experience and understanding of carpet is that this material has several characteristics that make its collection different from other materials covered by extended producer responsibility (EPR) programs such as paint, electronics, or beverage containers. These characteristics include the following:

- Carpet is a fixture to a home and is not generally moved when people relocate from one home to another.
- When carpet is replaced, it is most often removed by a professional (a flooring installer or construction contractor) that installs new carpet or other flooring material.
- The size and bulk of carpet prevent it from being easily disposed of in cart-based curbside collection.
- The size, bulk and underfoot nature of carpet limit its ability to be stockpiled or easily stored (as compared to paint, electronics, and even mattresses) also making it more challenging to transport.
- Carpet is easily contaminated and must be kept clean, dry, and free of debris (e.g., tack strips, etc.) to maintain viability for recycling.

Fixtures are defined in California Civil Code Section 660, and the California Department of Real Estate defines "fixture" as: Appurtenances attached to the land or improvements, which usually cannot be removed without agreement as they become real property; examples — plumbing fixtures, store fixtures built into the property, etc. Clarity with specifics to carpet is reflected in the real estate law article *"What is a Fixture and How to Prevent Misunderstandings After Close"* which provides the following:

> *Common examples of what a fixture is in residential and commercial property are: built-in cabinets, toilets, carpets, lighting, doors, sinks, counters, solar panels, heating units, air conditioning units, fireplaces, and built-in bookcases.*

Additional high level Convenience Study takeaway points were:

- For Residents, the vast majority (73%) reported having a flooring professional or contractor take away old carpet.
- Reduced costs (relative to disposal) are an important motivator across all audiences surveyed to consider carpet recycling.
- If recycling cost less than disposal, 68% of installers at Supply Houses reported they would consider recycling.
- Installers at Flooring Supply Houses noted they would consider recycling if a drop-off site were the same distance or closer than the current disposal site.

- Commercial Installers not already recycling noted they would be willing to travel up to 15 miles to recycle carpet. [**Note:** Coordination for a pilot Union Training Center collection site benefitting commercial installers is currently underway.]
- Installer Groups for Big Box and Large Retailers (e.g., Home Depot, Lowe's) handle large volumes of tear-out carpet and included some respondents who noted they were willing to accept carpet from the public in exchange for free or further discounted carpet recycling pick-up service from CARE Collector/Sorters. [**Note:** CARE has been in direct coordination with corporate and/or flooring installer groups for both Home Depot and Lowe's to confirm, ensure and facilitate where needed tear-out carpet capture.]
- Supply Houses, where small- and medium-sized carpet installers purchase supplies for carpet and flooring installation, could provide convenient collection location options for flooring professional. [**Note:** This approach is under active pilot development at the time of this report.]
- Mill Distribution Centers, while known to be located in areas that currently have existing Drop-off Sites, could provide increased convenience for the Mill's respective carpet dealer/retailer customers and their related installers who are already visiting these locations for their Will-Call flooring products. [**Note:** This approach is under active pilot implementation at the time of this report.]

This Convenient Collection Final Report & Implementation Plan is a direct result of CARE's 2018-2022 Plan Chapter 0 updates to CalRecycle. By agreement with CalRecycle, as implementation was not included in the original Convenient Collection Study, the implementation is occurring in parallel with documentation of the implementation plan. For specific comments and references made by CalRecycle staff regarding the Convenient Collection study, please refer to Appendix D.

CARE'S APPROACH TO SITING DROP-OFF SITES

Heretofore, CARE's approach to recruiting and siting public access carpet recycling Drop-off Site (DoS) facilities generally involved the following considerations:

- At a minimum, site one public access carpet recycling DoS per county and one per 500,000 population unit.
- Research private and local government owned/operated solid waste/recycling facilities.
- Solicit local government recommendations on solid waste/recycling facilities that may be preferred locations for establishment of carpet recycling DoS.
- In rural areas, for which there is no space, interest, or willingness to site a CARE DoS, work with local carpet retailers or independent recyclers serving the public.

Any carpet retailer site hosting a CARE collection container is required to be willing to accept carpet from the public.

- In urban areas with a perceived service coverage gap, CARE has actively initiated conversations with their Collector/Sorters regarding any of their private pick-up locations which may have available space and an interest in receiving no-cost collection service as a benefit for becoming a public or semi-public (available to flooring professionals only) carpet and pad DoS.

With regard to Collector/Sorter contracted private collection locations, CARE regularly provides direct referrals from interested retailers, installers, contractors and offers support to Collector/Sorters in the form of marketing support services as well as broader "Carpet *IS* Recyclable!" promotion and marketing on a regionally targeted basis.

As of June 2021, CARE reports 87 public access DoS locations in 53 Counties and over 240 privately contracted collection sites statewide.

CARE's REVISED APPROACH

In response to Cascadia's Convenient Collection Study, CARE's Final Report on Convenient Collection for Flooring Professionals delineates the updated strategies CARE plans to carry out in partnership with Flooring Professionals, Collector/Sorters, and the broader Solid Waste/Recycling Industry.

Cascadia's work delineated the below noted Convenience Factors and following each are CARE's updated approach and commitments:

Proximity: location of collection opportunities, often in the form of drop-off sites per population or geographic area; could be different for urban vs. rural areas.

- CARE commits to siting and supporting public access Drop-off Sites:
  - Ensuring at least one public carpet recycling DoS in every county and for those rural counties with either no retailers, minimal population and/or a solid waste Joint Powers Authority (JPA), CARE will continue to coordinate with and support their uniquely desired approach. Examples of which are CalRecycle's approval of jurisdictional requests by the Yuba-Sutter counties JPA for one DoS at a joint use transfer station and Alpine county's request to partner with a nearby county.
  - Ensuring there is at least one DoS per 500,000 population unit. With regard to population, acknowledging that flooring professionals and contractors handle the vast majority of tear-out carpet and in consideration of support for Collector/Sorters and their well-established private on-site collection services, CARE will continue with the planned approach of at least one DoS/500,000 population unit. Simultaneously, CARE will work

strategically with Collector/Sorters to support growth of public/semi-public access locations via regionally specific growth efforts at Supply Houses and/or the conversion of other private collection sites (e.g., retailers) to public/semi-public access.

- Evaluating the siting of collection sites in relation to the geotargeted locations of flooring retailers and known licensed flooring installers/contractors. Strategically, in 2020 CARE began utilization of a geo-targeted mapping approach for the siting of DoS locations which includes the following layers:
    - All Flooring Retailers
        - Carpet/Soft Surface Retailers
        - Hard Surface Retailers (*new*, tear-out PCC generators)
    - Licensed Flooring Contractors/Installers [1](*new)*
    - Solid Waste/Recycling Facilities (including C&D Facilities)
    - Mill Regional Distribution Centers
    - Supply Houses that "may" have space to host recycling

Access: availability of drop-off collection, such as the days and hours that a site is open for it to "count" as a participating location, or eligibility for pick-up service. Additionally, to whom a collection site is accessible by is a consideration with regard to access. As it has been determined that the majority of tear-out carpet is handled by flooring professionals and contractors, strategic consideration and prioritization for access has been carried out through that lens.

- CARE commits to continue utilizing the following approach to ensuring Access by:
    - Recruiting public access drop-off site locations that are open during standard business operating hours. Currently all CARE DoS locations operate during posted standard business hours that best serve the needs of their local communities.
    - Considering Solid Waste/Recycling facilities first, and some retailers in primarily rural counties, to provide general Public Access to carpet recycling opportunities. All conveniently offer site

[1] California C-15 License for Flooring and Floor Covering Contractors – contractors that prepare any surface for the installation of flooring and floor coverings - includes both soft (carpet) and hard surface installers, a count of approximately 7,000.

access during standard business operating hours appropriate for their respective community needs.

- Targeting Flooring Supply Houses, Flooring Wholesalers and Mill Regional Distribution Centers, in consideration of facility access and liability concerns, are anticipated to only be available to flooring professionals and related contractors.
- Supporting and encouraging Private Pick-up Sites for larger volume PCC generators, serviced by Collector/Sorters, which will likely have the highest access limitations and serve only the employees and related contractors of that particular flooring service provider. It is understood that in some areas, installation contractors serving Big Box retailers may be willing to allow other flooring professionals, and possibly the public, to drop-off PCC at their location in exchange for further discounted collection service rates. This is an arrangement that could be facilitated by CARE yet contracted directly with their respective Collector/Sorter.

Cost: pricing to participants, such as discounted recycling/tipping fees, free, or incentivized drop-off; could consider cost of recycling relative to disposal.

- CARE reaffirms and commits to the following regarding cost:
  - Continuing to support and allow DoS facilities located at solid waste/recycling facilities to set their own carpet/pad recycling fees (tipping fees) in order to reasonably cover their regionally unique operating costs of receiving and handling carpet/pad for recycling while working to achieve their waste diversion and recycling goals.
  - Continuing to present, discuss and advocate for a discounted receiving rate of at least 20% off solid waste disposal rates for the efforts flooring professionals put forth to keep carpet/pad dry, clean and debris free as a source separated recyclable material.
    - Effective 1/1/23, further cost related commitment to include, with the upcoming 2023-2028 Plan, a requirement that new Public Access DoS locations desiring to have access to CARE's full suite of business and recycling enhancements offer a minimum 20% discounted recycling rate for clean, source separated carpet/pad. Solid Waste/Recycling facilities in CARE's program are guaranteed no cost container and transportation services for a neutral value commodity (PCC). Business enhancements in CARE's program include: Materials Handling Technical Assistance, Marketing/Promotion training and directing customers to DoS, Micro Grant eligibility for site improvements/equipment, and option of No Cost Collection Container and Transport

Services or Transport Reimbursement for those preferring to Self-Haul. An example of a large volume, carpet capture solid waste facility offering a 50% discounted fee for carpet/pad is Bena Sanitary Landfill in Bakersfield.

Note: solid waste/recycling facilities do have the option to contract for collection services direct with a CARE program Collector/Sorter in order to assert their preference for full-rate tipping fee. Alternatively, a solid waste/recycling facility could offer flooring professionals the convenience of receiving mixed load materials for a full-rate tipping fee if they commit to CARE that carpet/pad will be kept clean/dry and sorted out for loading into carpet/pad recycling containers – a successful example of a facility diverting large volumes of carpet/pad via this approach is Contra Costa Waste Service located in Pittsburg.

- Recruiting potential Supply House locations, beginning 1/1/21, for carpet/pad recycling DoS locations as a convenient value-add service for their installer and flooring contractor customer base and advocate for a cost-covering carpet recycling drop-off fee that is, where possible, at least 40% below local landfill and/or Construction & Demolition Debris disposal rates. Additionally, participating Supply House carpet/pad recycling collection locations will be encouraged to offer a CARE sponsored installer/contractor incentive program that rewards participants for their efforts to bring clean, source-separated carpet/pad during the first 60 days of becoming a carpet collection site.
- Mill Regional Distribution Center (RDC) locations hosting self-service carpet/pad recycling drop-off collections for their customers will be counselled do so at no cost. The first Mill RDC DoS location started March 2021 and is piloting their initial self-service program as a no-cost service to their Will-Call customers. As each RDC facility has uniquely different facility access layouts, CARE is allowing each RDC the opportunity to evaluate any potential needed service changes should any added on-site staffing be required. Potential justification for an RDC to charge would be if RDC staff provides the actual unloading and/or loading of carpet/pad into collection container. Should an RDC determine that it is in the best interest of their Will-Call customer's safety and overall facility operations efficiency to offer customized staff services, the RDC will be advised to do so at a rate that is at least 50% below local solid waste/recycling facility disposal costs.
- Union Training Center Pilot Collection location is being planned for Northern California at the request of Union Leadership. It is

anticipated that this location will be offered at a modest to no cost rate for their signatory flooring contractors. Cost evaluation will be assessed on either a self-service option or assisted loading option which is yet to be determined.

Ease: preparation and handling requirements and support, such as that carpet must be clean, dry, and separated from other materials, including carpet padding or mixed waste; potential staffing support to assist with loading and stacking of carpet.

- CARE reaffirms and commits to the following regarding ease:
  - Continue to allow Drop-off Sites to receive carpet pad along with tear-out carpet
  - Continue to re-affirm via installer/contractor trainings that carpet does not need to be rolled fiber side out. Carpet can be rolled or folded fiber side in just the way it is most easily and conveniently removed from a room. CARE does not require all carpet to be rolled or folded – sites can allow receipt of carpet in a manner that is most convenient for their operations.
  - Continue to provide ready access to Micro Grants for DoS facility improvements such as overhead weather covers to help ensure carpet is kept dry and clean on-site. Additionally, using grant funds to increase convenience for on-site collections with covered containers for carpet collections.
  - Continue to encourage DoS locations with open-top container services such as roll-off bins and walking floor trailers (rather than an enclosed CARE trailer or cargo container) to consider offering smaller carpet/pad capture bins (e.g., 3 cubic yard bins, hoppers) to help increase efficiency and expedite unloading process by users. Just as flooring professionals remove flooring materials from a job site and load into their vehicles, they similarly unload those materials at a drop-off site location. Each site will have their respective placement and unloading procedures that facilitate safe and efficient unloading processes.

CARE will continue to provide the critical ongoing support for each of the aforementioned convenience factors for all DoS locations which include, at a minimum: installer/flooring professional outreach and carpet recycling training, DoS promotional materials, DoS outreach/promotion to flooring professionals, DoS signage, draft liability release, no-cost container services and transportation facilitation, technical assistance, and transport reimbursement for those finding self-hauling to be more convenient for their operations.

The following Figure A is an effort to provide a visual depiction of the programmatic efforts which CARE is committing to deliver and/or are already underway. To assist with identification, each component of the figure is labeled and noted in the following guide. The image, from top to bottom, reflects that there are over 7,000 licensed flooring professionals who could be handling tear out carpet (a). Of those, some are location-based flooring businesses (b), and an unknown smaller portion are home-based professionals (c). CARE's research and outreach efforts have delineated that there are essentially three categories in relation to carpet recycling: Has PCC volume and space to recycle (d); Has PCC volume and no space or the landlord does not allow for PCC collection container (e); and has modest to small volume and needs PCC recycling options (f). The large green circle (g) specifically notes that there are over 240 large volume flooring professional locations that do have space for PCC containers and are currently recycling their carpet/pad. The bottom portion of the image reflects the various opportunities which CARE has underway, denoted as either "Existing" (denoted in green color) or "In Process" (denoted in blue color).

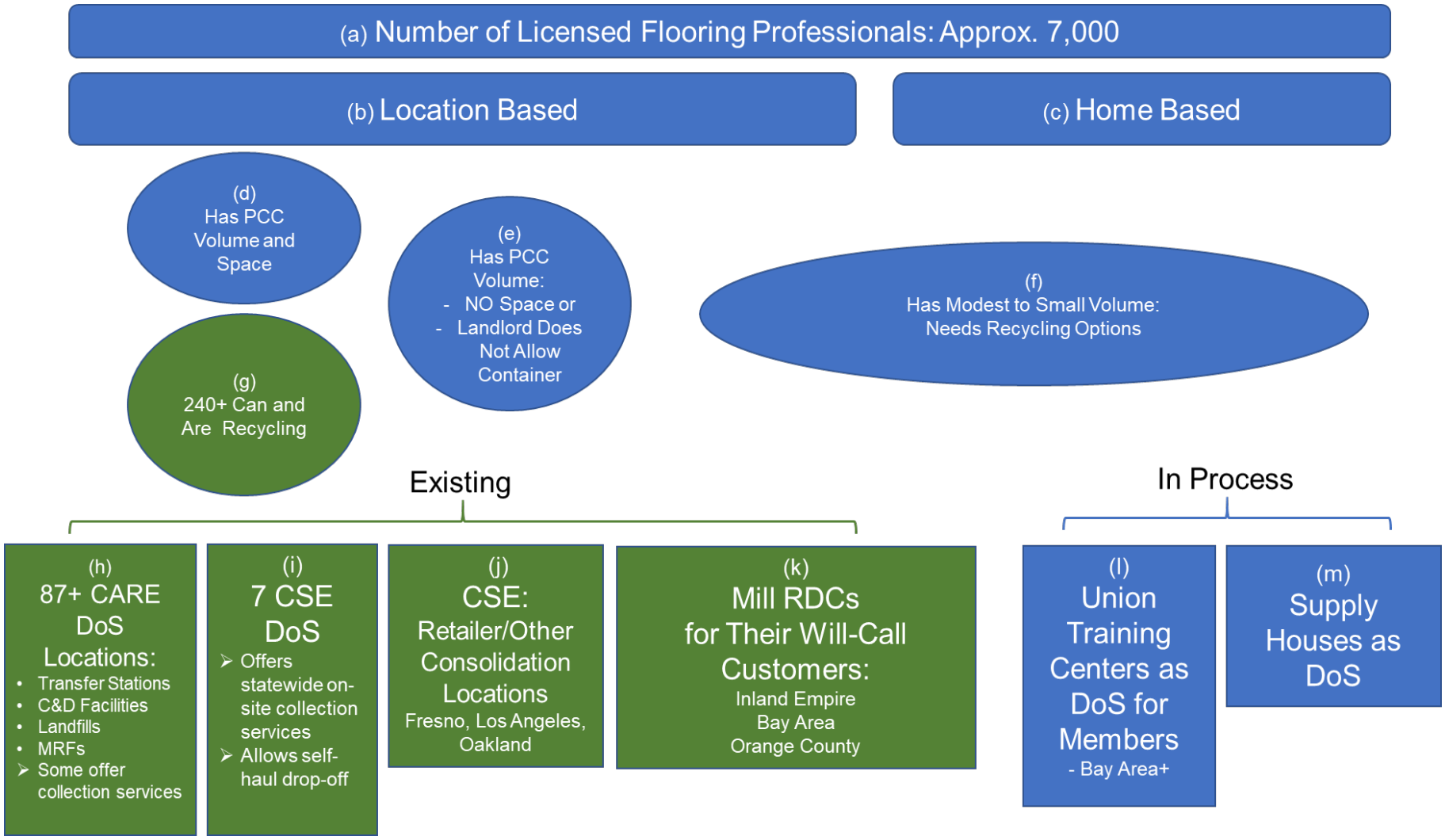
The existing available carpet recycling capture opportunities are:

- (h) CARE's 87+ Drop-off Sites are primarily located at permitted Solid Waste/Recycling Facilities such as Transfer Stations, C&D Facilities, Landfills and Material Recovery Facilities (MRFs). Of those, some have further appreciated the recycling and waste diversion opportunities they can offer their customers and jurisdictions by offering smaller volume carpet/pad collections which are transported back to their facility for consolidation into their CARE DoS carpet/pad container.
- (i) 7 CARE Program Collector/Sorter (CSE) Drop-off locations which provide statewide collection services for larger volume PCC generators as well as allow for in-person PCC drop-offs for those preferring to self-haul tear-out carpet/pad. Presently there are over 240 large volume carpet/pad generators utilizing on-site private pick-up carpet/pad collection services.
- (j) CSE: Retailer/Other Consolidation Locations are generally retailer locations which have larger collection containers and allow area flooring professionals the opportunity to access very low-cost carpet/pad drop-off. The currently known locations are in Fresno, Los Angeles, and Oakland.
- (k) Mill Regional Distribution Centers (RDCs) are large to very large size facilities to which respective mills ship new flooring materials for either subsequent shipment to their customer's locations or Will-Call pickup by customers. CARE is currently piloting their first Mill RDC self-service location in a non-urban area, with two other more urban area located RDCs anticipated to be established in either Q2 or Q3 of 2021.

The two carpet recycling capture opportunities which CARE has actively in process are:

- (l) Union Training Centers as a Drop-off Site for their members. The initial pilot location is anticipated in the Bay Area before the end of Q3, 2021. Union representatives anticipate offering distinct training sessions for their hosted self-service Drop-off Site in an effort to provide a no-cost carpet recycling option for members.
- (m) Supply Houses as Drop-off Sites are locations which many flooring professionals visit regularly for various types of flooring supplies, including carpet, underlayment/padding, and tack strips. There are over 80 Supply Houses throughout the state and after satellite image review of each location CARE has determined that there may only be 30-40 locations that actually have available space.

Figure A. Overview of Carpet Recycling Programmatic Effort for Flooring Professionals



COMMITMENTS TO CONVENIENT COLLECTION SITES FOR FLOORING PROFESSIONALS & RURAL COUNTIES

CARE recognizes the need and benefit of providing convenient and cost saving access to carpet recycling opportunities for flooring professional. Similarly, CARE recognizes its responsibility to be strategically and fiscally responsible in the siting of DoS locations. Beyond the above noted commitments to Proximity, Ease, Access, Cost, and related reaffirmation of support services CARE commits to the following approach with regard to appropriate consideration for future collection locations based upon the minimum commitments of one CARE DoS location per county and one CARE DoS location per 500,000 population unit. This approach is intended to ensure strategic siting of locations intended to facilitate expanded carpet volume collection in relation to supply sources generated by flooring professionals.

Geotargeted Mapping

CARE has mapped all known carpet retailers, hard surface retailers and licensed installers (who are not also designated as flooring retailers) against existing CARE DoS locations as well as potential DoS locations (permitted solid waste/recycling facilities, supply houses, flooring wholesalers and mill distribution centers.

It is known that Flooring Supply Houses generally locate in relative proximity to retail flooring locations and flooring contractors. Many flooring contractors and installers make regular and sometimes frequent visits to Supply Houses; thus, consideration and pursuit of Supply Houses as a potential carpet recycling drop-off location site is a strategically appropriate priority option.

Via Cascadia's survey of retailers and initial mapping process, it was readily clear that retailers locate where there are population clusters (customers); thus, for CARE's strategic mapping analysis retailer locations reasonably serve as proxy for population.

Access for Rural Counties

Rural Counties are defined by Public Resources Code (PRC) section 40183-4 revision 2008, as a county which disposes of less than 200,000 tons of waste annually. Initially CARE committed to siting a public access DoS in each county by year end 2019. Despite consistent effort and adoption incentive offering, time has shown that carpet recycling program interest has been slower to gain traction or material priority ranking in some rural counties. Space constraints have been the issue in some instances, for which alternate locations at willing retailer locations were sited (Kings, Trinity, and Tulare counties). For the remaining outstanding counties, CARE has strategically

contracted with Pitto & Pitto Associates for their direct and trusted experience in working with and representing rural counties. This approach, combined with a commitment to streamline and expedite CARE's micro grant funding process to provide support for equipment acquisitions and/or site improvements, has proven beneficial in securing previously reluctant drop-off site locations. CARE is committed to working with the remainder counties on timelines that are conducive to their respective workload priorities – especially with the new challenges presented as a result of the COVID-19 pandemic in addition to wildfires and enforcement related to Mandatory Commercial Recycling, Mandatory Commercial Organics Recycling, and implementation of SB 1383. As of April 31, 2021, only the following counties remain: Colusa, Madera, Nevada, and Stanislaus each of which, other than Nevada County have agreed to participate on varying timeline schedules – many of which have been significantly delayed due to various prioritization and staffing impacts directly related to COVID-19 pandemic.

Based upon participation commitments received, CARE reasonably anticipates siting of public access drop-off sites in the remaining three counties by year-end 2021.

Table 1, titled Public and Private Collection Sites Across California Counties, provides an overview of all 58 California counties, with the ten most populous counties highlighted in gray. This intent of this table is to show the growth in the number of Private Collection sites, the CARE Public Access Drop-off Sites and the combined Total Sites collecting carpet per County. The column titled Covered Counties shows those counties meeting the minimum one site per county requirement, those showing a "0" are the remaining few counties which will have collection sites established by year end 2021.

The column titled Sites Needed per 500,000 calculates the number of CARE DoS locations needed compared to the population shown. The final column titled # (number) Sites Still Needed is calculated by subtracting the number of CARE Public Sites from Sites Needed per 500,000, while also accounting for the minimum 1 site per county commitment.

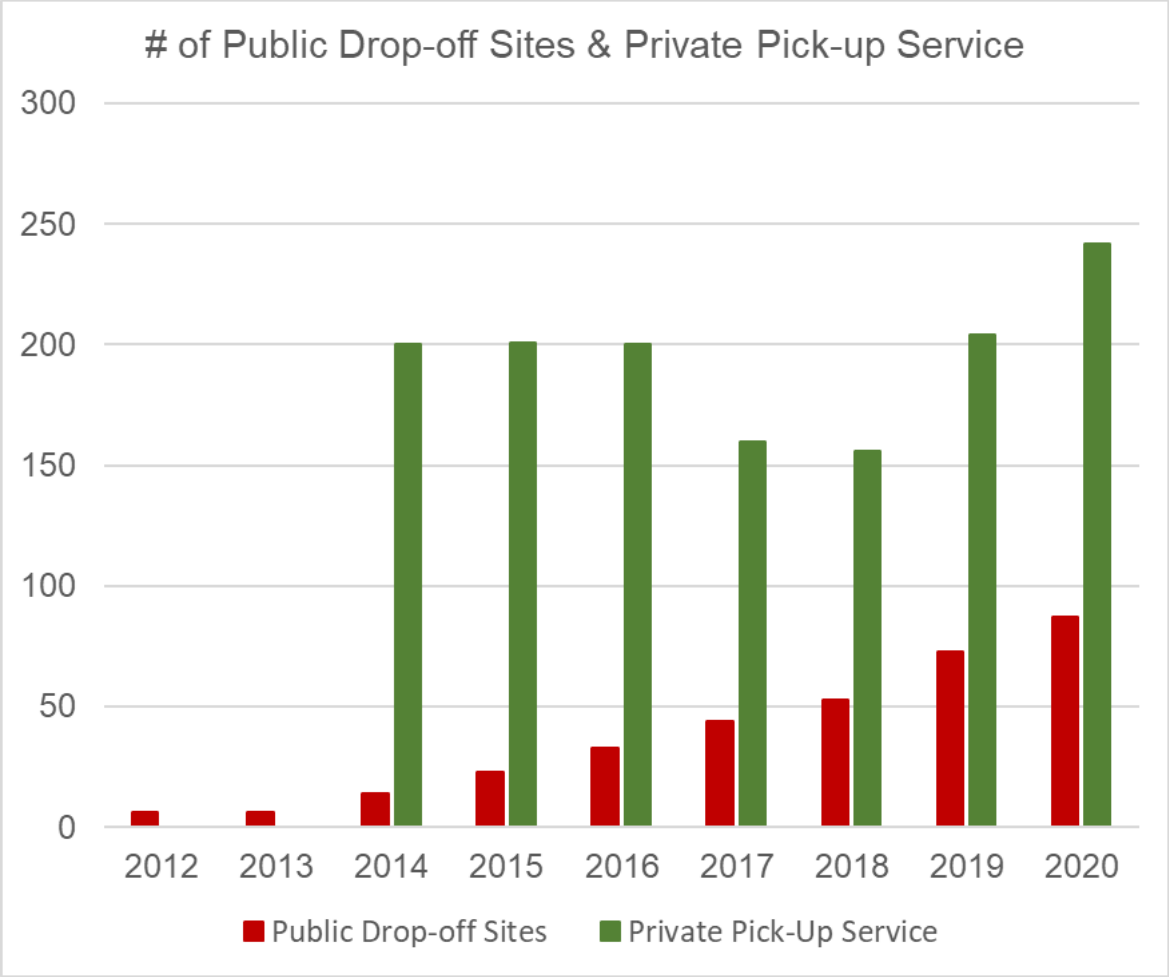
Throughout the state there are over 329 locations in which carpet/pad are collected from flooring professionals and the public. Of those locations 242 are private collection and CSE sites, as well as 87 are public access DoS locations. These data are a snapshot in time. Private collection sites do tend to vary based on business relationships.

The table reflects that CARE needs a minimum of 38 Locations which is inclusive of the remaining four Rural County Drop-off Sites for Colusa, Madera, Nevada, and Stanislaus.

Table 1. Public, CSE and Private Collection Sites Across California Counties

County	CSE LOCATIONS & PRIVATE SITES Year End 2019	CSE LOCATIONS & PRIVATE SITES Year End 2020	CARE PUBLIC SITES 3/31/21	TOTAL SITES Per COUNTY	Covered Counties	Population	Sites Needed per 500,000	# Sites Still Needed
Alameda	21	21	3	24	1	1,670,834	3	0
Alpine (El Dorado)	0	0	1	1	1	1,142	0	0
Amador	0	0	0	0	0	37,676	1	1
Butte	2	1	2	3	1	210,291	0	0
Calaveras	1	1	1	2	1	45,023	0	0
Colusa	0	0	0	0	0	21,902	1	1
Contra Costa	5	7	1	8	1	1,153,561	2	1
Del Norte	0	0	1	1	1	27,298	0	0
El Dorado	2	3	1	4	1	193,227	0	0
Fresno	4	5	1	6	1	1,023,358	2	1
Glenn	0	0	1	1	1	29,400	0	0
Humboldt	0	0	1	1	1	133,302	0	0
Imperial	0	0	1	1	1	188,777	0	0
Inyo	0	0	1	1	1	18,584	0	0
Kern	1	2	3	5	1	917,553	2	0
Kings	0	0	1	1	1	153,608	0	0
Lake	0	0	1	1	1	64,040	0	0
Lassen	0	0	1	1	1	28,833	0	0
Los Angeles	47	50	6	56	1	10,172,951	20	14
Madera	0	0	0	0	0	158,147	1	1
Marin	0	1	1	2	1	260,831	1	0
Mariposa	0	0	1	1	1	18,067	0	0
Mendocino	0	0	1	1	1	87,946	0	0
Merced	0	0	1	1	1	283,521	1	0
Modoc	0	0	1	1	1	9,570	0	0
Mono	0	0	1	1	1	13,464	0	0
Monterey	1	1	2	3	1	441,143	1	0
Napa	1	1	2	3	1	139,088	0	0
Nevada	2	3	0	3	0	98,114	1	1
Orange	9	10	2	12	1	3,194,332	6	4
Placer	4	6	3	9	1	403,711	1	0
Plumas	0	0	1	1	1	18,260	0	0
Riverside	8	10	1	11	1	2,442,304	5	4
Sacramento	26	36	4	40	1	1,555,365	3	0
San Benito	0	0	1	1	1	62,353	0	0
San Bernardino	5	12	5	17	1	2,180,537	4	0
San Diego	33	34	3	37	1	3,343,355	7	4
San Francisco	1	2	1	3	1	897,806	2	1
San Joaquin	4	4	2	6	1	773,632	2	0
San Luis Obispo	0	0	1	1	1	277,259	1	0
San Mateo	4	4	1	5	1	773,244	2	1
Santa Barbara	1	1	3	4	1	451,840	1	0
Santa Clara	11	13	2	15	1	1,961,969	4	2
Santa Cruz	1	1	3	4	1	271,233	1	0
Shasta	0	0	1	1	1	178,045	0	0
Sierra	0	0	1	1	1	3,201	0	0
Siskiyou	0	0	2	2	1	44,461	0	0
Solano	1	2	2	4	1	440,224	1	0
Sonoma	2	2	3	5	1	492,980	1	0
Stanislaus	1	1	0	1	1	557,709	1	1
Sutter (Yuba JPA)	4	5	0	5	1	100,750	0	0
Tehama	0	0	1	1	1	65,129	0	0
Trinity	0	0	1	1	1	13,548	0	0
Tulare	0	0	1	1	1	479,977	1	0
Tuolumne	0	0	2	2	1	54,917	0	0
Ventura	1	2	1	3	1	842,886	2	1
Yolo	1	1	1	2	1	221,705	0	0
Yuba	0	0	1	1	1	78,887	0	0
TOTALS	**204**	**242**	**87**	**329**	**54**	**39,782,870**	**83**	**38**

Figure B. Number of Public Drop-off Sites and Private Pick-up Service Sites



Since the CARE Program inception, which started with a Rural Counties pilot covering six counties, CARE has steadily grown the public access carpet recycling Drop-off Site collection locations year over year. The CARE public sites complement the long-standing private pick-up service sites which over time have averaged just about 200 locations statewide. The private pick-up service locations are primarily large volume sites collected by CARE's Collector/Sorters via large trailers (e.g., 28' to 53'), some of which are serviced upwards of twice per week. Generators of such volume generally include flooring contractors serving the multi-family sector, large commercial sector, and installation contractors for "Big Box" retailers such as Home Depot and Lowe's.

The above bar chart (Figure B) reflects CARE's growth in public Drop-off Sites which complement the relatively steady and ongoing private pick-up service collections. It should be noted that during the 2017-18 time-period there were interesting factors as a large Southern California Processor went out of business and during that same period

CARE noted an increase in the volume captured at the related area public Drop-off Sites. Also, of note, during 2012 and 2013, it is reasonably believed that there were a similar number of private pick-up service locations as in 2014; however, there was no specific formal data reporting established at that time.

The following map figures provide visual depictions for carpet retailer locations (Figure C), shown as purple dots. Figure D highlights the primary Mill Distribution Center locations in relation to retailers (shown with yellow dots) within a moderate 20-mile radius of the Distribution Centers. Interestingly, the siting of one Mill's non-urban area Distribution Center Drop-off Site will be providing a convenient and very cost-effective carpet/pad recycling option to a customer located over 50 miles away in a small mountain community. As part of their regular course of business, this customer does regularly come down to pick-up their new flooring install products at the Distribution Center.

Figure E reflects CARE public access Drop-off Site locations (with green dots), CARE Recycler locations who provide service to large volume tear-out carpet/pad retailers and installers (blue dots), independent Drop-off Sites receiving carpet/pad from the public (gray dots) and the previously noted Mill Distribution Centers. It should be noted that some CARE Recycler locations are only open to large volume deliveries and/or pre-arranged professional flooring contractor deliveries. The round dashed circles around each location show a 20-mile radius buffer. A complete listing of all CARE DoS locations, as of March 2021, can be found in Appendix A.

Figure F combines Figures C, D and E and the related 20-mile buffer zone radius to show the coverage of services in relation to retailer locations. The yellow retailer dots reflect reasonable service coverage and access coverage within 20-miles while the purple retailer dots represent areas in need of expanded coverage services.

Figure G is similar to Figure F, representing the coverage provided by the possibility of adding Flooring Supply Houses and Wholesale Distribution Centers (shown with black squares) in relation to CARE public access Drop-off Site locations (with green dots), CARE Recycler locations (blue dots) and independent Drop-off Sites (gray dots) with the dashed circles again showing a 20-mile radius around each.

Figure H provides a view of the various Solid Waste and Recycling facility locations throughout the state. Construction and Demolition (C&D) Debris processing/sorting facilities are gray dots, Inert and C&D Disposal facilities are green dots, Landfills are blue dots, Transfer Stations are red dots and those solid waste and recycling facilities with carpet recycling are shown with yellow dots.

Finally, with respect to the current CARE and Recycler hosted carpet Drop-off Site locations, mapping evaluation by Cascadia Consulting Group reflects that 89% of Retailers are located within 20 miles of a Drop-off Site (shown in Figure I). With CARE's plan to pursue siting of carpet/pad collection opportunities at Supply Houses, Cascadia has projected that 95% of Retailer locations would be within 20 miles of either a Drop-off Site or a Supply House (shown in Figure J). It should be again noted that not all Supply House locations have the space or landlord willingness to host a carpet recycling container. Regarding any such areas, CARE will work in partnership with their Collector/Sorter partners and Flooring Professionals in the area to find a suitable alternative location. CARE will also work closely with Distribution Centers to better capture quantifiable coverage information on the farther-reaching distances convenience that their hosted Drop-off Sites provide to their Will-Call customers picking up new flooring.

Figure C. Carpet Retailer Locations

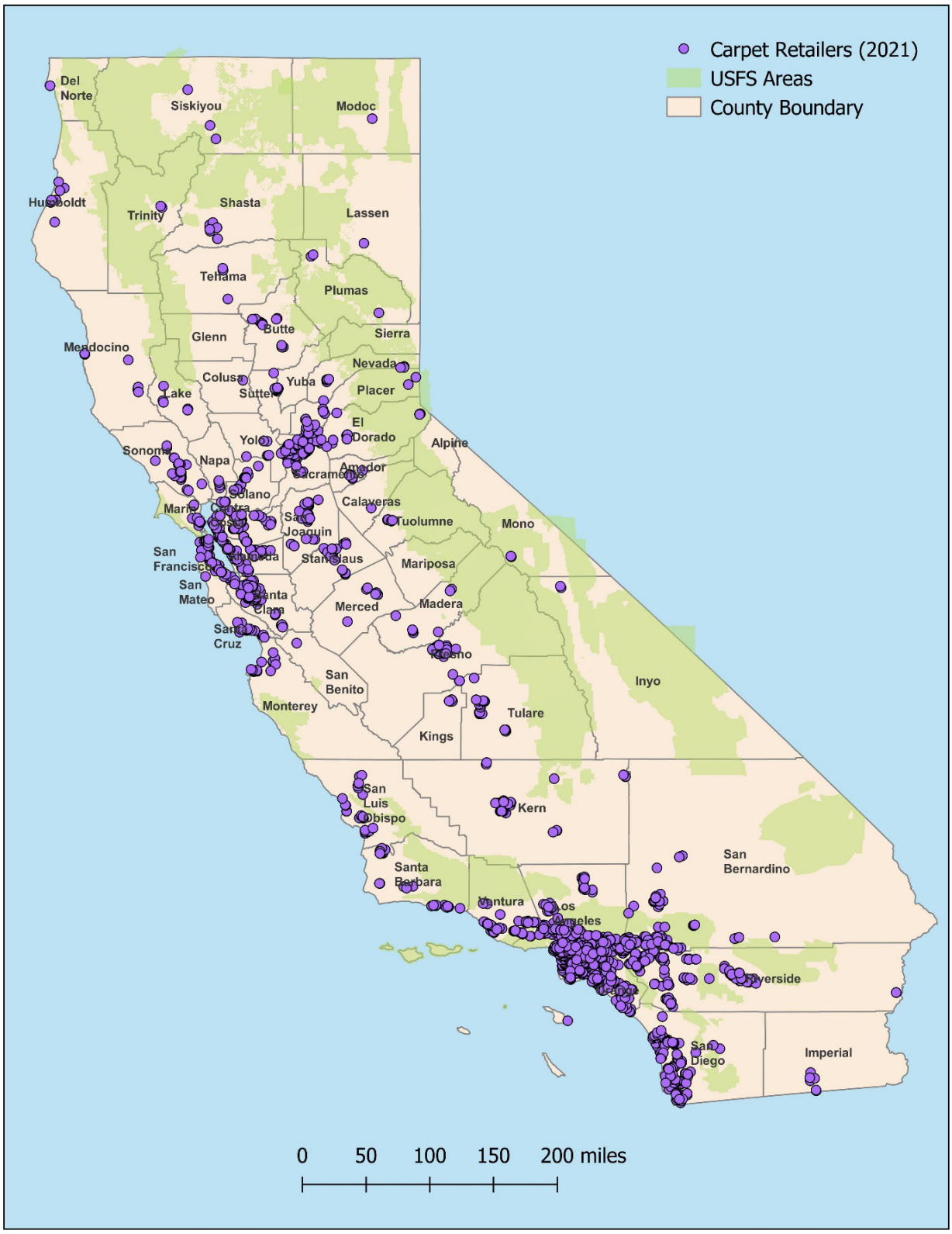


Figure D. Carpet Distribution Centers with 20-mile Buffers and Retailer Locations

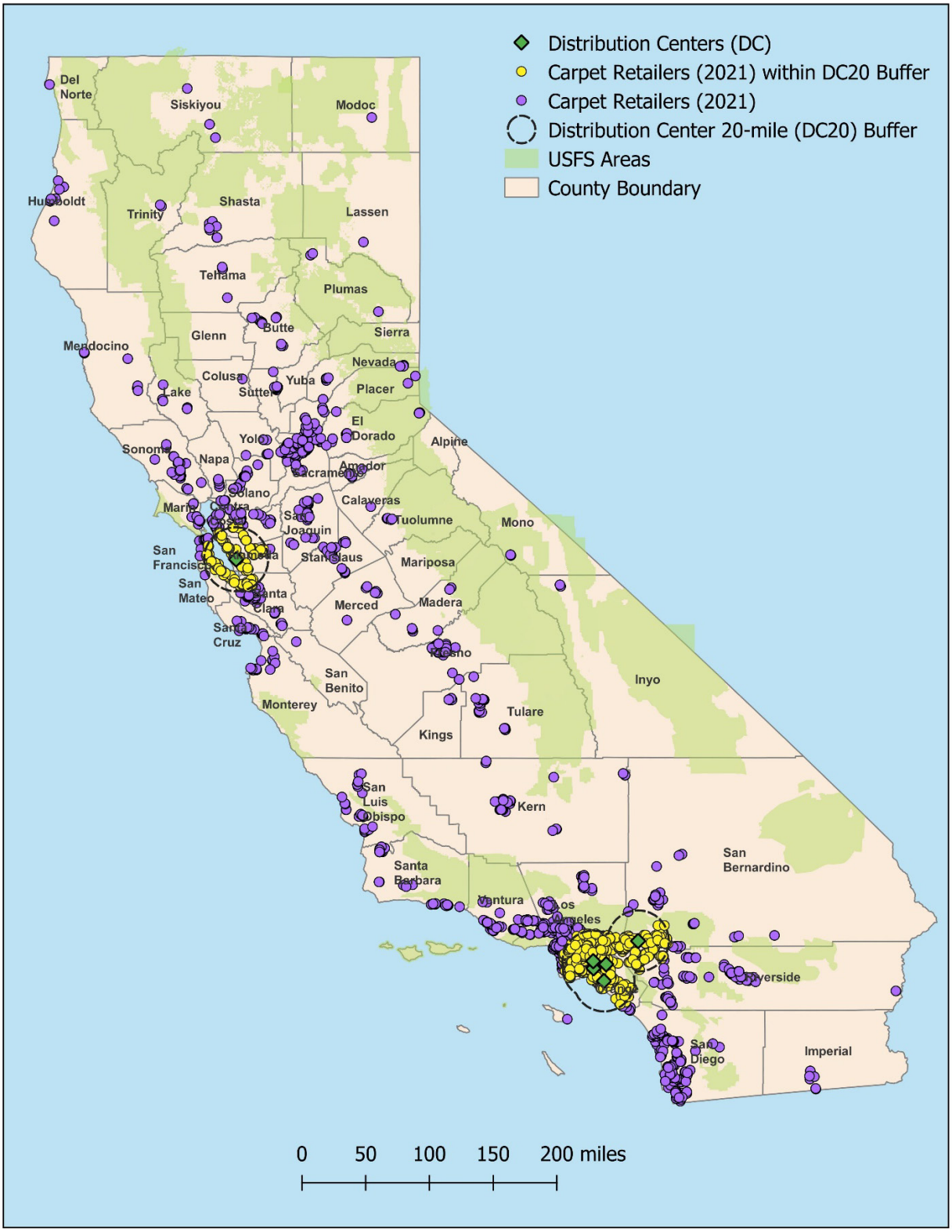


Figure E. Drop-off Sites + Carpet Distribution Centers with 20-mile Buffer Zones

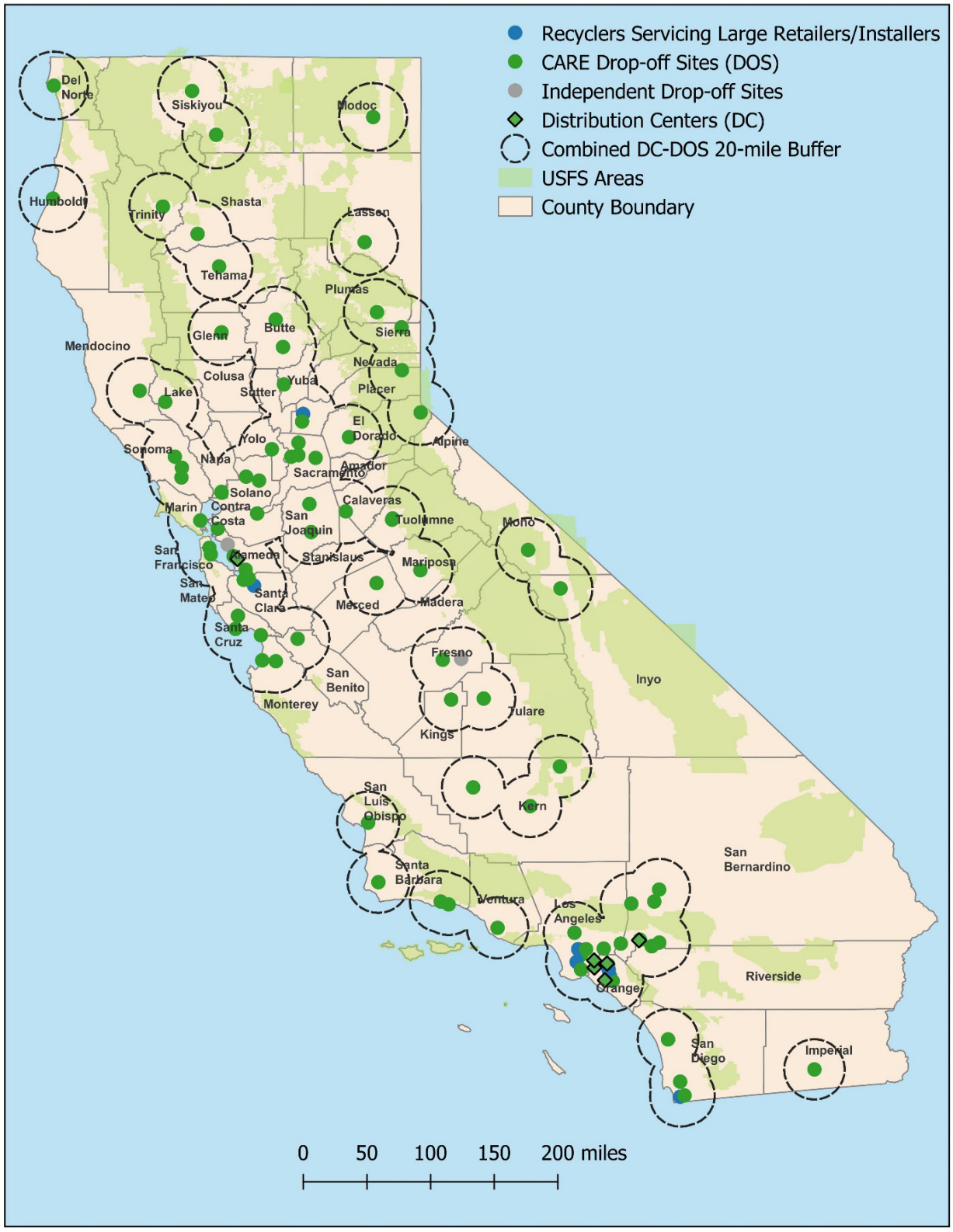


Figure F. Drop-off Sites and Carpet Distribution Centers with 20-mile Buffers and Retailer Locations

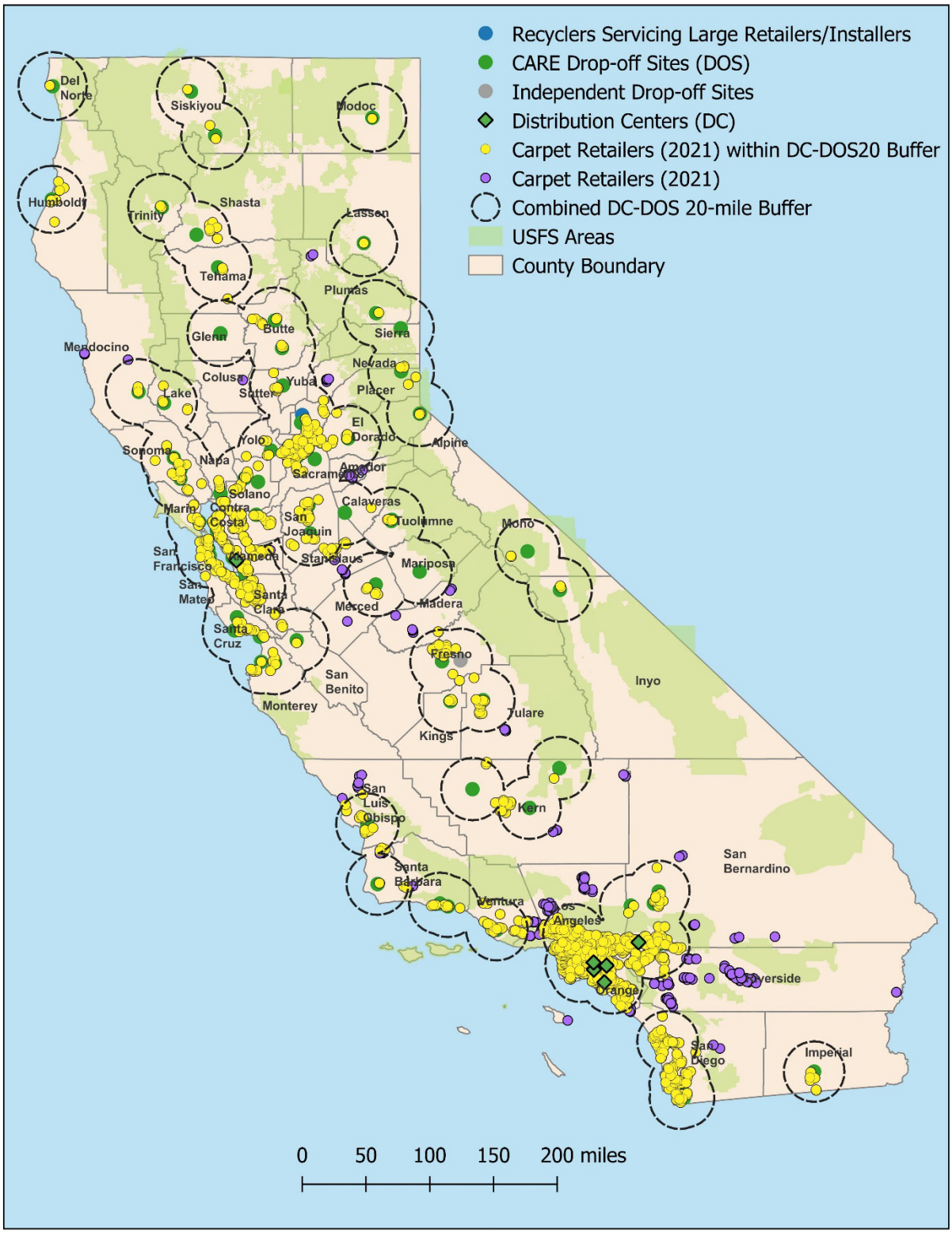


Figure G. Supply Houses and Drop-off Sites with 20-mile Buffers

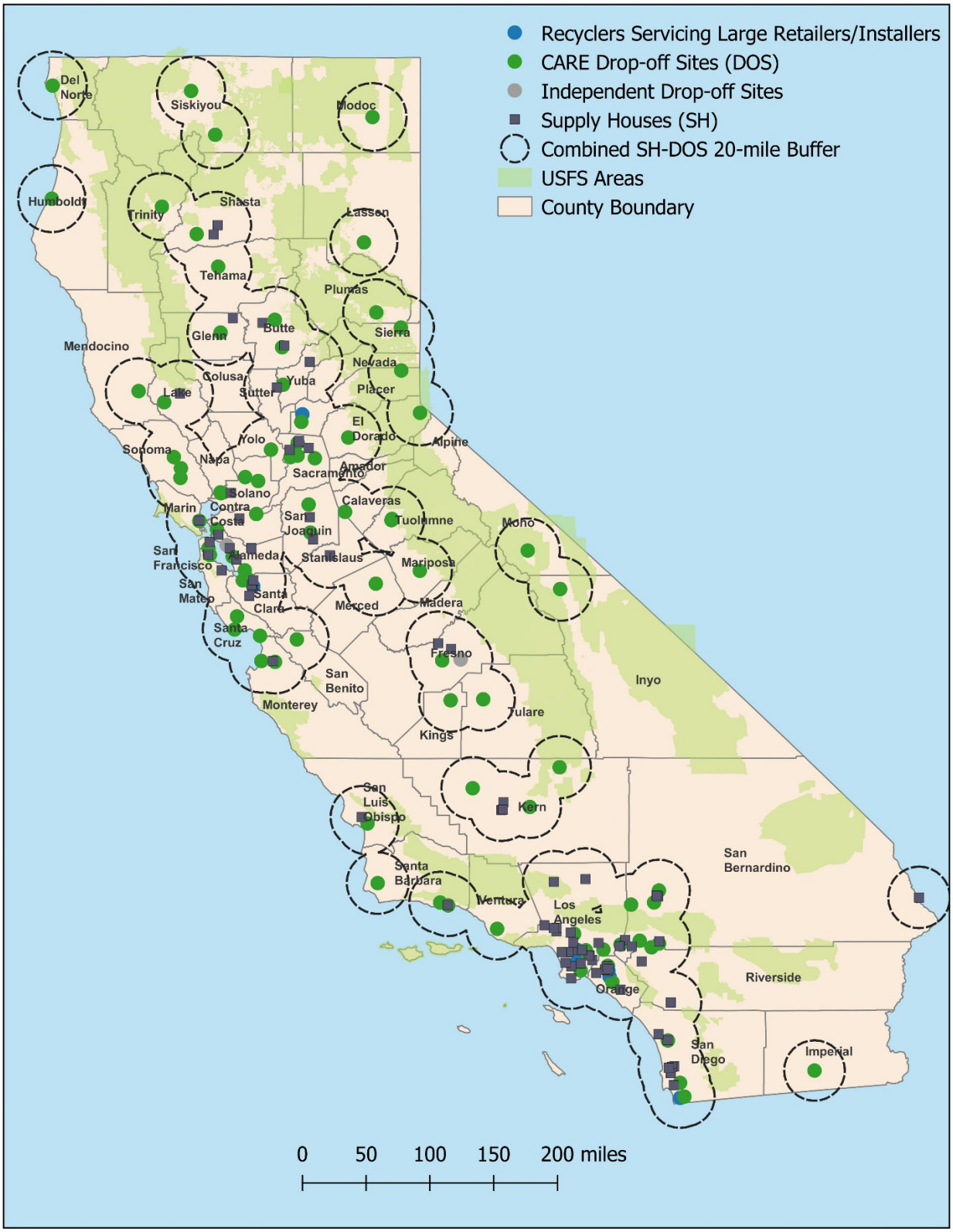


Figure H. Solid Waste/Recycling Facilities in California, per CalRecycle SWIS (Solid Waste Information System, 2019 – filtered per CARE parameters for size)

Figure I. Retailer Locations Covered Within 20-miles of a Drop-off Site

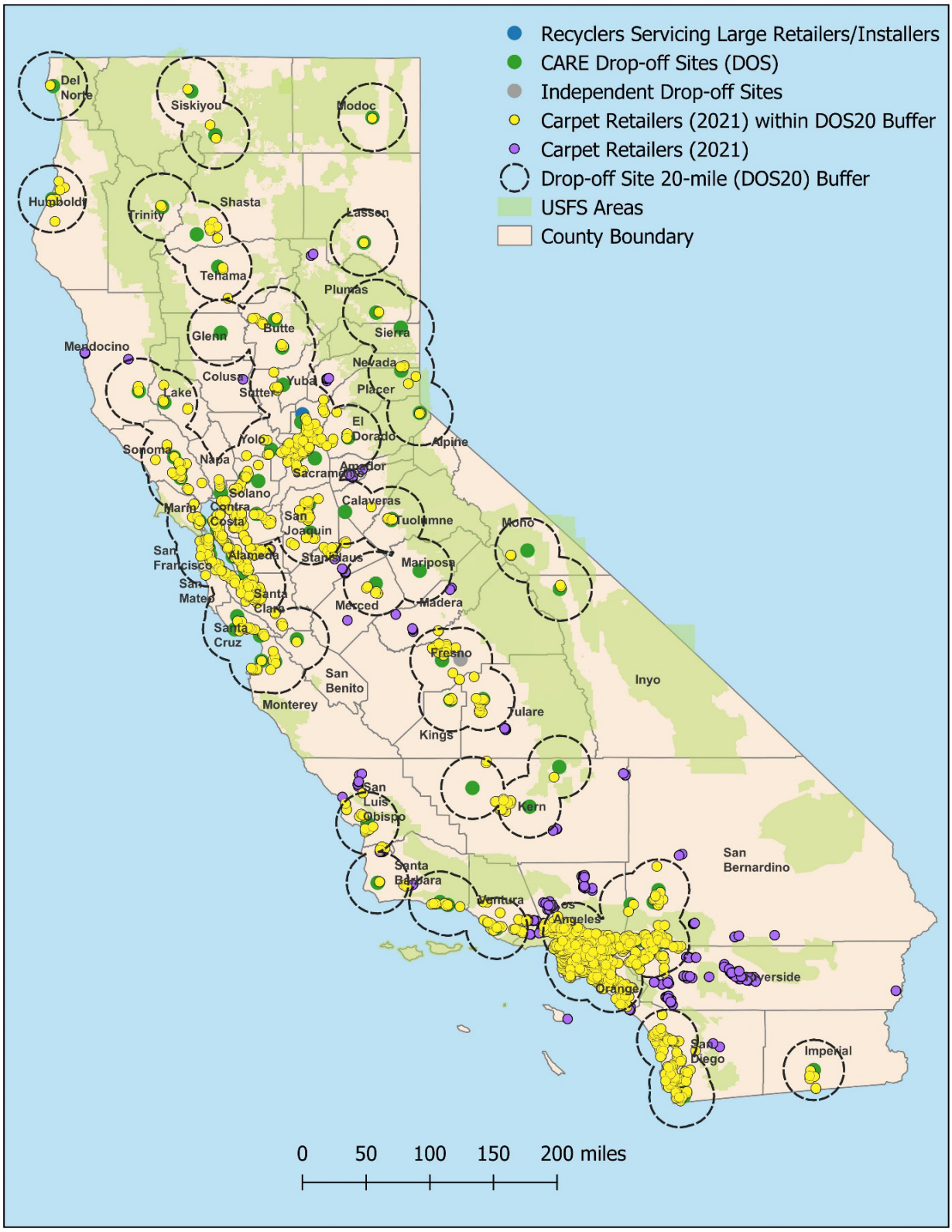
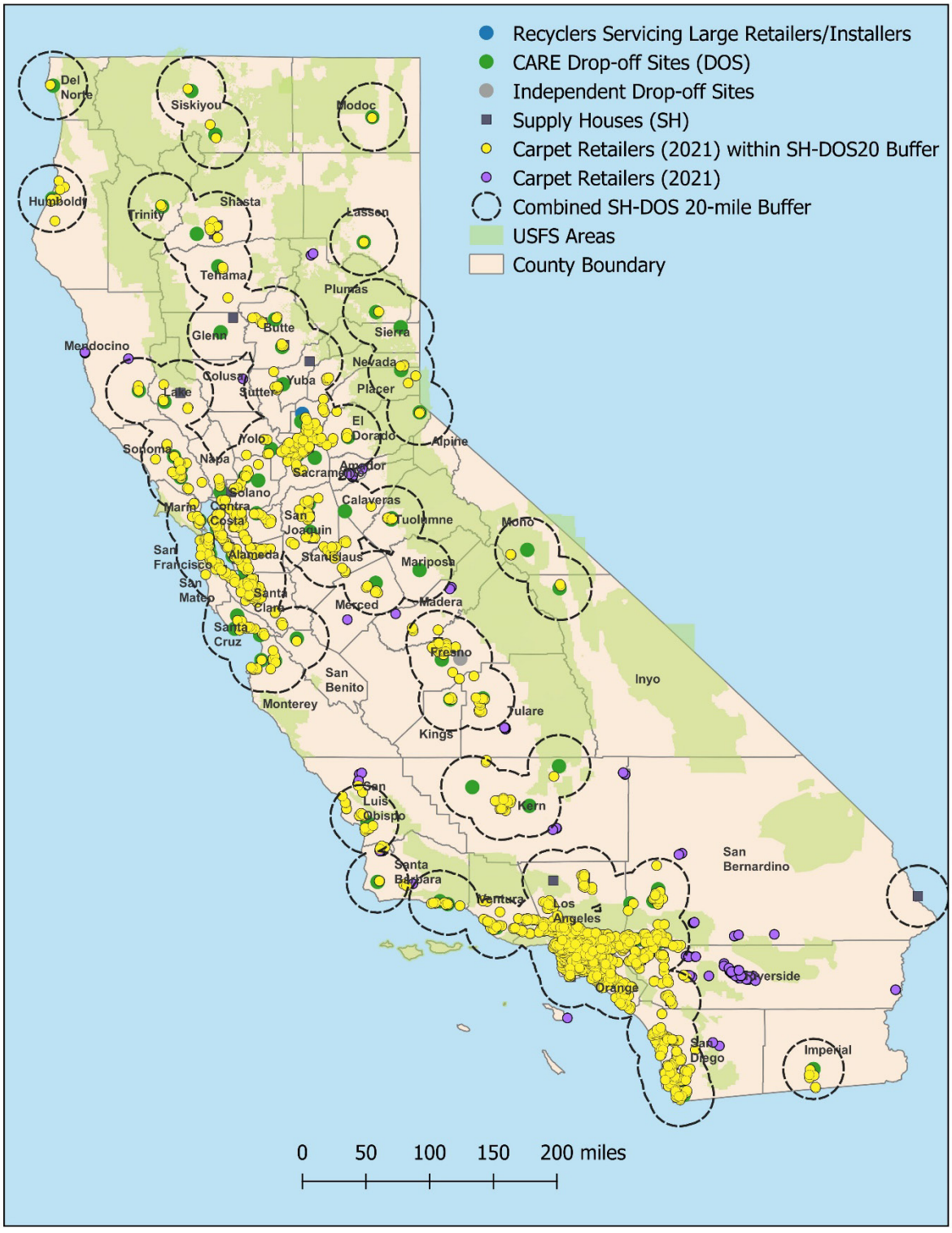


Figure J. Retailer Locations Covered Within 20-miles of a Drop-off Site or Supply House



APPENDIX

APPENDIX A. PUBLIC DROP-OFF SITES FOR CARPET RECYCLING

Drop-off Site	Location	City	County	Type
Advance Disposal Co.	17105 Mesa Street	Hesperia	San Bernardino	CARE
American Reclamation	4560 Doran Street	Los Angeles	Los Angeles	CARE
Aquafil Recycling	187 Mace St	Chula Vista	San Diego	CSE
Ben Lomond Transfer Station	9835 Newell Creek Rd	Ben Lomond	Santa Cruz	CARE
Bena Sanitary Landfill	2951 Neumarkel Rd	Bakersfield	Kern	CARE
Benton Crossing Landfill	899 Pit Road	Crowley Lake	Mono	CARE
City of Berkeley Transfer Station	1201 Second St	Berkeley	Alameda	CARE
Bishop-Sunland Landfill	110 Sunland Indian Reservation Rd	Bishop	Inyo	CARE
Black Butte Transfer Station - Mount Shasta	3710 Spring Hill Rd	Mt. Shasta	Siskiyou	CARE
Blue Line Transfer, Inc.	500 East Jamie Court	South San Francisco	San Mateo	CARE
Buena Vista Landfill	1231 Buena Vista Dr	Watsonville	Santa Cruz	CARE
Cal Sierra Transfer Station	19309 Industrial Dr	Sonora	Tuolumne	CARE
Circular Polymers	3390 Venture Rd	Lincoln	Placer	CSE
Cold Canyon Landfill	2268 Carpenter Canyon Rd	San Luis Obispo	San Luis Obispo	CARE
Conservation Corps North Bay	365 Blodgett Street	Cotati	Sonoma	CARE

Drop-off Site	Location	City	County	Type
Construction & Demolition Recycling Inc	9309 Rayo Ave	South Gate	Los Angeles	CARE
Contra Costa Waste Service	1300 Loveridge Rd	Pittsburg	Contra Costa	CARE
CR&R Environmental Services	9828 Buckwheat Road	Phelan	San Bernardino	CARE
CR&R Environmental Services	2059 E Steel Road	Colton	San Bernardino	CARE
Del Norte County Transfer Station	1700 State Street	Crescent City	Del Norte	CARE
City of Oxnard - Del Norte Regional Recycling and Transfer Station	111 S Del Norte Blvd	Oxnard	Ventura	CARE
Delleker Transfer Station	73980 Industrial Way	Delleker	Plumas	CARE
Devlin Road Transfer Station	889 Devlin Rd	American Canyon	Napa	CARE
Dick's Carpet One	36 Hegenberger Ct	Oakland	Alameda	INDEPT
Eastern Impressions – Cristal Materials	510 W Carob St	Compton	Los Angeles	CSE
Eastern Impressions – Dimax Fiber Recovery	1111 E 4th St	Santa Ana	Orange	CSE
Eastern Regional Landfill	900 Cabin Creek Rd	Truckee	Nevada	CARE
EDCO Recycling & Transfer Signal Hill	2755 California Ave	Signal Hill	Los Angeles	CARE
EDCO San Marcos Construction Demolition Processing Facility	224 South Las Posas Rd	San Marcos	San Diego	CARE

Drop-off Site	Location	City	County	Type
El Dorado Disposal/Waste Connections	4100 Throwita Way	Placerville	El Dorado	CARE
Florin Perkins Public Disposal Site	4201 Florin Perkins Rd	Sacramento	Sacramento	CARE
Franeys Carpet One Floor and Home	525 N Liberty St	Visalia	Tulare	CARE
Fremont Recycling & Transfer	41149 Boyce Rd	Fremont	Alameda	CARE
Glenn County Transfer Station	5700 County Rd 33	Artois	Glenn	CARE
Grand Central Recycling & Transfer Station	999 S Hatcher Ave	City of Industry	Los Angeles	CARE
GreenWaste Carpet Recycling	1201 N 15th St	San Jose	Santa Clara	CSE
Hawthorne Street Transfer Station	1059 West Hawthorne St	Eureka	Humboldt	CARE
Hayward Transfer Station	3458 Enterprise Ave	Hayward	Alameda	CARE
Highway 59 Landfill	7040 North Highway 59	Merced	Merced	CARE
Holdorff's Recycling	605 N Court St	Alturas	Modoc	CARE
Imperial Landfill	104 E Robinson Rd	Imperial	Imperial	CARE
Kern Valley Transfer Station	6092 Wulstein Ave	Kernville	Kern	CARE
Kiefer Landfill	12701 Kiefer Blvd	Sloughhouse	Sacramento	CARE
L and D Landfill	8635 Fruitridge Rd	Sacramento	Sacramento	CARE
Lake County Waste Solutions	230 Soda Bay Rd	Lakeport	Lake	CARE
City of Lompoc Landfill	700 Avalon St	Lompoc	Santa Barbara	CARE

Drop-off Site	Location	City	County	Type
Los Angeles Fibers	4920 South Boyle Ave	Vernon	Los Angeles	CSE
Lovelace Materials Recovery Facility & Transfer Station	2323 E Lovelace Rd	Manteca	San Joaquin	CARE
Loyalton Transfer Station	1 Garbage Pit Road	Loyalton	Sierra	CARE
MarBorg Industries C&D Recycling Center	119 N Quarantina St	Santa Barbara	Santa Barbara	CARE
Marin Resource Recovery Center	565 Jacoby St	San Rafael	Marin	CARE
Mariposa Landfill, Composting and Recycling Center	5593 Highway 49 North	Mariposa	Mariposa	CARE
Monterey Regional Waste Management District	14201 Del Monte Blvd	Marina	Monterey	CARE
Napa Recycling & Waste Services	820 Levitin Way	American Canyon	Napa	CARE
Neal Road Recycling and Waste Facility	1023 Neal Road	Paradise	Butte	CARE
North Area Recovery Station (NARS)	4450 Roseville Rd	North Highlands	Sacramento	CARE
North County Recycling Center and Sanitary Landfill	17720 E. Harney Lane	Lodi	San Joaquin	CARE
Oberlin Road Transfer Station	2420 E Oberlin Rd	Yreka	Siskiyou	CARE
Otay Landfill	1700 Maxwell Rd	Chula Vista	San Diego	CARE
Pomona Valley Transfer Station	1371 E 9th St	Pomona	Los Angeles	CARE
Recology Butte-Colusa Counties	2720 South 5th Ave	Oroville	Butte	CARE

Drop-off Site	Location	City	County	Type
Recology Hay Road	6426 Hay Rd	Vacaville	Solano	CARE
Recology San Francisco Transfer Station	501 Tunnel Ave	San Francisco	San Francisco	CARE
Recology Sutter-Yuba	3001 Levee Rd	Marysville	Yuba	CARE
Recology Vacaville Solano	855 1/2 Davis St	Vacaville	Solano	CARE
Republic Services - Anaheim	2740 East Coronado Street	Anaheim	Orange	CARE
Republic Services/Global Materials Recovery	3899 Santa Rosa Avenue	Santa Rosa	Sonoma	CARE
RJR Recycling	1771 San Felipe Rd	Hollister	San Benito	CARE
Robert A. Nelson Transfer Station/Agua Mansa MRF	1830 Agua Mansa Rd	Riverside	Riverside	CARE
Robinson's Interiors, Inc.	230 N 11th Ave	Hanford	Kings	CARE
Rock Creek Landfill	12021 Hunt Rd	Milton	Calaveras	CARE
SANCO Resource & Recovery	6700 Federal Blvd	Lemon Grove	San Diego	CARE
City of Santa Cruz Resource Recovery Facility	605 Dimeo Lane	City of Santa Cruz	Santa Cruz	CARE
Serv-Wel Disposal	901 South Maple Ave	Montebello	Los Angeles	CARE
Shafter-Wasco Sanitary Landfill	17621 Scofield Ave	Shafter	Kern	CARE
SMaRT Station (Bay Counties)	301 Carl Road	Sunnyvale	Santa Clara	CARE
Solid Waste Systems	3151 Taylor Dr	Ukiah	Mendocino	CARE

Drop-off Site	Location	City	County	Type
Sonora Recycling, LLC	18647 Eagle Ridge Dr	Sonora	Tuolumne	CARE
South Coast Recycling Transfer Station	4430 Calle Real	Santa Barbara	Santa Barbara	CARE
South Tahoe Refuse Transfer Station	2140 Ruth Avenue	South Lake Tahoe	El Dorado/ Alpine	CARE
Sun Street Transfer Station	139 Sun St	Salinas	Monterey	CARE
Sunset Environmental Transfer Station	16122 Construction Cir West	Irvine	Orange	CARE
Tehama County/Red Bluff Landfill	19995 Plymire Rd	Red Bluff	Tehama	CARE
The Floor Store	1306 Nugget Lane	Weaverville	Trinity	CARE
Transportek Logistics	4898 Annadale Ave	Fresno	Fresno	INDEPT
Upstream Textiles	1228 W Collins Ave	Orange	Orange	CSE
Victor Valley MRF	17000 Abbey Ln	Victorville	San Bernardino	CARE
West Central Landfill – City of Redding	14095 Clear Creek Rd	Igo	Shasta	CARE
West Coast Waste	3077 S Golden State Frontage Rd	Fresno	Fresno	CARE
West Valley MRF and Transfer Station	13373 Napa Street	Fontana	San Bernardino	CARE
Western Placer Waste Management Authority	3195 Athens Ave	Lincoln	Placer	CARE
Windsor Material Recovery Facility	590 Caletti Ave	Windsor	Sonoma	CARE
Yolo County Central Landfill	44090 County Rd 28H	Woodland	Yolo	CARE

Drop-off Site	Location	City	County	Type
Zaengles Carpet One Floor & Home	2800 Main Street	Susanville	Lassen	CARE
Zanker Recycling	675 Los Esteros Rd	San Jose	Santa Clara	CARE

APPENDIX B. NUMBER OF PUBLIC DROP-OFF SITES AND PRIVATE PICK-UP SERVICE SITES

Year	Public Drop-Off Sites	Private Pick-Up Service Sites
2012	6	No Data
2013	6	No Data
2014	14	200
2015	23	201
2016	32	200
2017	44	216
2018	53	156
2019	73	204
2020	87	242

APPENDIX C. PUBLIC, CSE AND PRIVATE COLLECTION SITES ACROSS CALIFORNIA COUNTIES

County	CSE LOCATIONS & PRIVATE SITES Year End 2019	CSE LOCATIONS & PRIVATE SITES Year End 2020	CARE PUBLIC SITES 3/31/21	TOTAL SITES Per COUNTY	Covered Counties	Population	Sites Needed per 500,000	# Sites Still Needed
Alameda	21	21	3	24	1	1,670,834	3	0
Alpine (El Dorado)	0	0	1	1	1	1,142	0	0
Amador	0	0	0	0	0	37,676	1	1
Butte	2	1	2	3	1	210,291	0	0
Calaveras	1	1	1	2	1	45,023	0	0
Colusa	0	0	0	0	0	21,902	1	1
Contra Costa	5	7	1	8	1	1,153,561	2	1
Del Norte	0	0	1	1	1	27,298	0	0
El Dorado	2	3	1	4	1	193,227	0	0
Fresno	4	5	1	6	1	1,023,358	2	1
Glenn	0	0	1	1	1	29,400	0	0
Humboldt	0	0	1	1	1	133,302	0	0
Imperial	0	0	1	1	1	188,777	0	0
Inyo	0	0	1	1	1	18,584	0	0
Kern	1	2	3	5	1	917,553	2	0
Kings	0	0	1	1	1	153,608	0	0
Lake	0	0	1	1	1	64,040	0	0
Lassen	0	0	1	1	1	28,833	0	0

County	CSE LOCATIONS & PRIVATE SITES Year End 2019	CSE LOCATIONS & PRIVATE SITES Year End 2020	CARE PUBLIC SITES 3/31/21	TOTAL SITES Per COUNTY	Covered Counties	Population	Sites Needed per 500,000	# Sites Still Needed
Los Angeles	47	50	6	56	1	10,172,951	20	14
Madera	0	0	0	0	0	158,147	1	1
Marin	0	1	1	2	1	260,831	1	0
Mariposa	0	0	1	1	1	18,067	0	0
Mendocino	0	0	1	1	1	87,946	0	0
Merced	0	0	1	1	1	283,521	1	0
Modoc	0	0	1	1	1	9,570	0	0
Mono	0	0	1	1	1	13,464	0	0
Monterey	1	1	2	3	1	441,143	1	0
Napa	1	1	2	3	1	139,088	0	0
Nevada	2	3	0	3	0	98,114	1	1
Orange	9	10	2	12	1	3,194,332	6	4
Placer	4	6	3	9	1	403,711	1	0
Plumas	0	0	1	1	1	18,260	0	0
Riverside	8	10	1	11	1	2,442,304	5	4
Sacramento	26	36	4	40	1	1,555,365	3	0
San Benito	0	0	1	1	1	62,353	0	0
San Bernardino	5	12	5	17	1	2,180,537	4	0
San Diego	33	34	3	37	1	3,343,355	7	4
San Francisco	1	2	1	3	1	897,806	2	1
San Joaquin	4	4	2	6	1	773,632	2	0

County	CSE LOCATIONS & PRIVATE SITES Year End 2019	CSE LOCATIONS & PRIVATE SITES Year End 2020	CARE PUBLIC SITES 3/31/21	TOTAL SITES Per COUNTY	Covered Counties	Population	Sites Needed per 500,000	# Sites Still Needed
San Luis Obispo	0	0	1	1	1	277,259	1	0
San Mateo	4	4	1	5	1	773,244	2	1
Santa Barbara	1	1	3	4	1	451,840	1	0
Santa Clara	11	13	2	15	1	1,961,969	4	2
Santa Cruz	1	1	3	4	1	271,233	1	0
Shasta	0	0	1	1	1	178,045	0	0
Sierra	0	0	1	1	1	3,201	0	0
Siskiyou	0	0	2	2	1	44,461	0	0
Solano	1	2	2	4	1	440,224	1	0
Sonoma	2	2	3	5	1	492,980	1	0
Stanislaus	1	1	0	1	1	557,709	1	1
Sutter (Yuba JPA)	4	5	0	5	1	100,750	0	0
Tehama	0	0	1	1	1	65,129	0	0
Trinity	0	0	1	1	1	13,548	0	0
Tulare	0	0	1	1	1	479,977	1	0
Tuolumne	0	0	2	2	1	54,917	0	0
Ventura	1	2	1	3	1	842,886	2	1
Yolo	1	1	1	2	1	221,705	0	0
Yuba	0	0	1	1	1	78,887	0	0
TOTALS	**204**	**242**	**87**	**329**	**54**	**39,782,870**	**83**	**38**

APPENDIX D. CALRECYCLE RFA NOTES ON CARE'S CHAPTER 0 AND CONVENIENT COLLECTION STUDY

The following section includes specific comments and references made by CalRecycle staff upon review of CARE's Convenient Collection Study as one of the Chapter 0 deliverables on September 1, 2019. CARE has chosen to include the direct comments in an effort to ensure each Requirement noted in CalRecycle staff's November 19, 2019 Request for Approval (also known as, RFA) by the CalRecycle Director.

The specific RFA Requirements and related comments following are numbered for clarity by CARE.

#1: CARE did not demonstrate it fulfilled Requirement II *(CalRecycle overview)*

RFA pg. 1: Requirement II: The Convenient Collection Study validates data reported by CARE that flooring professionals, including installers and retailers, generate the majority of postconsumer carpet collected through the program. However, CARE's proposed modifications to its convenience goals do not address how the program will provide convenience for flooring professionals.

CARE Response:

- CARE believes that this Convenient Collection for Flooring Professionals Final Report & Implementation Plan addresses how CARE plans to expand collections and improve convenience for flooring professionals.

#2: RFA pg. 9: CalRecycle's Requirement II: *(CalRecycle Analysis and Detail)*

With respect to convenience, CARE must describe how it will fulfill these commitments by September 1, 2019:

a. Submit modifications to CalRecycle regarding its convenience goals, such that the goals are consistent with the results of the convenience study.

Staff Analysis of Requirement II:

a. CARE partially fulfilled Requirement II.a. Following completion of the Convenient Collection Study conducted by Cascadia Consulting Group (Cascadia), CARE proposed convenient collection goals in the Chapter 0 Report that include siting a CARE drop-off site in every county with carpet retailers by the end of 2019, and ensuring counties with population densities of 500,000 or more have at least one public drop-off site per population increment by the end of 2021. CARE also mentioned the expanding private collection network contributing to providing access to carpet recycling, although CARE does not have direct control over the number or availability of, or types or quantities of carpet collected at private sites.

   Although Cascadia found availability and proximity to be important convenience factors to survey participants, and geospatially analyzed the proximity of populations and various flooring professionals to CARE's current drop-off sites, it

is unclear how CARE used this information to determine its proposed goals. ***Neither CARE nor Cascadia provided an analysis of CARE's proposed goals to demonstrate that the modifications will improve collection convenience consistent with the results of the study***. While Cascadia's study supports CARE's conclusion that flooring professionals, including installers and retailers, generate a large volume of postconsumer carpet, CARE did not propose any modifications that focus on flooring professionals. Furthermore, Cascadia concluded that "most survey respondents across all sectors reported greater willingness to recycle carpet if it was free or cost less than current disposal methods" (Attachment 5, p. 222 – *Cascadia Convenience Study*). However, ***CARE did not address cost in its proposed goals even though cost was identified as an important factor to increase carpet recycling*** in the survey results, especially for commercial carpet installers and construction and demolition contractors.

CARE offered several additional approaches to potentially expand access to collection opportunities including, but not limited to, developing a proposal to work with mills to provide on-site collection to large volume direct-ship customers with adequate storage space, continue developing possible collection sites at Union Training Centers, and completing the siting of at least one CARE drop-off site or developing creative alternative collection options in every county. While staff acknowledge that many of these additional approaches appear to be good ideas to increase collection convenience to relevant audiences, ***CARE does not commit to undertaking these efforts or provide specific goals or timelines associated with implementing these potential approaches.***

- **Incomplete Requirements**: Demonstrate how the proposed convenience goals are consistent with the results of Cascadia's Convenient Collection Study or revise the goals to be consistent with the study, including developing a convenience goal that provides collection convenience to flooring installers and retailers.

CARE Response:

- CARE is prioritizing their selection of public/semi-public (access for flooring professionals only) based upon convenience for flooring professionals. Primarily included in that selection process is geotargeting locations around flooring professionals, cost savings over current landfill disposal costs and locations they may most regularly visit (e.g., Supply Houses).
- CARE has made clear and very specific commitments to ensure carpet recycling opportunities for clean, source separated carpet/pad will cost less than current disposal methods.
- CARE, in partnership with Mills and their Regional Distribution Centers (RDCs), have established a plan for hosting carpet/pad Drop-off Sites for their Will-Call customers. The first pilot location opened the end of Q1 2021, and this self-

service recycling opportunity has been offered as a free service to customers. It is anticipated that at least one additional RDC will come on in Q2.

- CARE, in direct partnership with Union leadership, will be supporting the establishment of a Union Training Center pilot collection location at the Union's San Leandro location. Per conversation with the Union, and the discussed self-service recycling opportunity planned, it is anticipated that this location will be a no-cost opportunity for Union installers. Following the timing lead of the Union, CARE hopes to have this location established by the end of Q2 2021.
- CARE believes that this Convenient Collection for Flooring Professionals Final Report & Implementation Plan addresses CalRecycle's Requirement II. Concerns on how CARE plans to expand collections and improve convenience for flooring professionals.