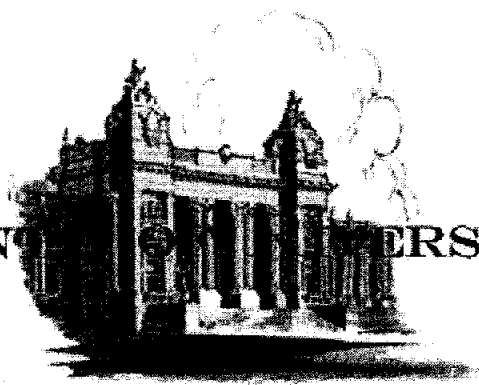


## Board of Supervisors

COUNTY OF RIVERSIDE



County of Imperial  
Board of Supervisors  
940 Main Street  
El Centro, CA 92243

District 1	<b>Bob Buster</b> 951-955-1010
District 2	<b>John F. Tavaglione</b> 951-955-1020
District 3	<b>Jeff Stone</b> 951-955-1030
District 4	<b>John J. Benoit</b> 951-955-1040
District 5	<b>Marion Ashley</b> 951-955-1050

Re: Mesquite Landfill (CUP#06-0003)

Dear Chairman and Honorable Members of the County of Imperial Board of Supervisors:

The County of Riverside appreciates the opportunity to be involved in the environmental review and collaboration on the revisions to the Mesquite Landfill project (Conditional Use Permit No. 06-003; hereinafter referred to as "Project"). Over the last eight months, the County of Riverside Transportation and Planning Departments have worked with your Planning Department and responded to the available environmental documents.

The Project proposes to alter the previously approved distribution of solid waste and treated ash from the County of Los Angeles to the County of Imperial. Previously, such waste was to be transported through Riverside County solely by railcar. The revised Project now proposes to transport such waste through Riverside County by truck. The revised Project adequately discloses that heavy-load truck traffic will increase along Interstate 10 ("I-10") and State Route 86 ("SR-86"). This increase in heavy-load truck traffic, approximately 400 daily trips, will create additional traffic safety, cumulative traffic and circulation, and air quality impacts within the County of Riverside.

The traffic impact analysis for the Project only forecasts to the year 2030, whereas the Mesquite Landfill has an operational capacity of at least 100 years. In our opinion, the length of the proposed operations at the landfill provides the need to collaborate on a fair and equitable distribution of these traffic and air quality impacts and requires that our respective staff continued to work together to develop methods in which both counties, Imperial and Riverside, will be adequately mitigated against future and long-term environmental impacts.

These challenges were reiterated in a recent meeting on March 16, 2011 with the Los Angeles County Sanitation District (LACSD), the project proponent. Imperial County Planning Department staff, as well as County of Riverside staff attended the meeting. During the meeting, County of Riverside staff voiced our concern that the Project will increase heavy-load truck traffic and air quality hazards. Unfortunately, despite previously stating our concerns, the environmental analysis and the Project conditions of approval do not currently propose to contribute improvements and maintenance on a fair share basis with the County of

Riverside. LACSD contends that the Project will not significantly impact roadways within the County of Riverside and therefore, a fair share analysis on the long-term wear and tear on Interstate 10 and State Route 86 is not necessary or required by the Project conditions or the California Environmental Quality Act (CEQA).

The County of Riverside respectfully disagrees with LACSD's position. We remain concerned about the environmental impacts of the addition of 400 daily heavy-load truck trips proposed to travel on roadways in the County of Riverside that are already in need of improvements and repair. We understand the roadways identified within the Project are under the control of Caltrans. However, the County of Riverside typically finds itself bearing the responsibility of addressing cumulative traffic impacts and safety concerns to supplement what Caltrans is able to provide with limited state funding. As such, we request the County of Imperial and LACSD continue working with our Transportation and Planning Departments to develop a fair and equitable distribution of the impacts and ways to address these impacts in the future, especially for a Project which could potentially operate for 100 years.

Further, the County of Riverside believes additional effort can be made to reduce the significant air quality impacts and to develop added measures to implement the required mitigation. County of Riverside Planning officials previously cited concerns with the proposed implementation of certain air quality measures for the Project. An example is the requirement that all heavy-load trucks utilize EPA-2007 or later certified diesel engines to reduce particular matter and NOx impacts into an already degraded air basin, as monitored by the Imperial County Air Quality Management District. While our Planning Department readily acknowledges coordination with the Imperial Air Quality Resources Board is an important factor in reducing these air quality impacts, the Imperial Air Quality Resources Board does not have jurisdiction within Riverside County. This lack of jurisdiction makes it difficult for the County of Riverside, and Air Resource Boards within the County of Riverside, to monitor the impacts of diesel trucks while they are traveling through the Riverside County. We recommend the Project be conditioned to coordinate with applicable Air Resource Boards within the County of Riverside so as to ensure the required mitigation is fully implemented in both counties.

Additionally, the environmental document states impacts to Greenhouse Gas ("GHG") emissions are significant, but does not develop reduction protocols as required by Assembly Bill 32 (the Global Climate Solutions Act). The development and implementation of GHG protocols will provide a substantial improvement to the Air Quality impacts. These protocols are not only required by State law, but will serve to control the long-term impacts of truck traffic, diesel particulates, and traffic safety concerns for residents that live and work along I-10 and SR-86.

This daily increase in heavy-load truck traffic being generated from Los Angeles County through Riverside County to Imperial County has the potential to cause serious and long-term health risks upon unique and already disadvantaged communities along the identified routes (such as the community of Mecca) as a result of an increase in degrading air quality and GHG emissions. The additional 400 heavy-load truck trips per day will continue to degrade traveled roadways in Riverside County and will continue to place certain communities in the

area at an economic, circulation, and health disadvantage due to the unmitigated impacts imposed upon these communities. For these reasons, we look forward to continuing our collaboration with Imperial County in an effort to address these environmental impact concerns and hopefully, developing measures to protect Riverside County residents from the long-term impacts of this Project.

The County of Riverside Board of Supervisors recognizes and appreciates the time and expense that such a large and long-term project requires. We commend your staff for their consideration of our challenges and concerns. Moreover, we look forward to continuing to develop a fair share agreement that addresses, and ultimately reduces, the impacts to the County of Riverside which are long-term and can pose a risk to our ability to serve and protect our residents of Riverside County.

Thank you for your time and consideration.

Respectfully,

Supervisor Bob Buster, Chair

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Supervisor John Tavaglione, Vice Chair

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Supervisor John Benoit

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Supervisor Marion Ashley

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Supervisor Jeff Stone

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