

May 13, 2013

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TO: Pima County Board of Supervisors
130 West Congress Street
Tucson, Arizona 85701

FROM: Tina West
201 West Esperanza #1003
Ajo, Arizona 85321

RE: Board of Supervisors May 14, 2013 Meeting: Addendum Item 19, Tucson Recycling and Waste Services, LLC contract

Rebuttal to CAO C.H. Huckleberry's May 13 Response to my May 8, 2013 Submittal
NEED FOR ENVIRONMENTAL REVIEW

Please make this letter part of the record of the Board Meeting of May 14, 2013. Please also distribute a copy of this letter to all 5 members of the Board and the County Administrative Officer.

In my opinion, CAO Huckleberry's statement in Paragraph 6 of his letter of May 13, 2013 to me is in error and misleading. It is not only operation under permits which require that entering into this contract be subject to environmental review. First of all, the Board is carrying out a discretionary action in adopting this contract, qualifying it as a project for environmental review under NEPA. The intent of this NEPA requirement is to provide facts with which the Board can make an INFORMED decision regarding the probable environmental effects of this contract, particularly in the Ajo and Western Pima County area. Secondly, in the Ajo area specifically, this project does not qualify for an exemption under NEPA because a SIGNIFICANT PHYSICAL CHANGE is being made there. An area waste management fee schedule is being implemented and a compacting transfer station is being constructed where none existed before. This is not a mere transfer of existing facilities from one operator to another. This creates several probable significant adverse effects to the Ajo environment which have not been mitigated to a level of non-significance with alternative measures as set forth in my letter of May 8, 2013. The proposed Contract action before the Board at this time, although it may not be inclusive of all further additions and amendments, constitutes a CUMULATIVE IMPACT when taken with past and future actions towards contracting Pima County's Solid Waste Disposal Services.

At this time I also reassert comments in my May 8, 2013 letter to the Board regarding untimely public disclosure, responsibility for fee schedule increase (no specific documentation of what constitutes \$400,000 attributed to Ajo operations has been offered), need for environmental review and need for an Ajo specific Area Plan For Waste Management.

CAO Huckleberry's urgency to rush this Contract through at all environmental costs in an effort to balance the County budget is evident in his May 13 response letter. His response thereby attempts to dismiss and shortchange Ajo and Western Pima County. I ask the Board to override his response and require CAO Huckleberry and County staff to take the time and effort to fully serve Western County citizen interests as though they were his own.

Sincerely,

Tina West
Ajo, Arizona