December 6, 2007

Geraldine Knatz  
Executive Director  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, CA 90731

RE: Final Environmental Impact Statement/Report (FEIS/R) for the Port of Los Angeles TraPac Terminal Expansion Project (Berths 136-147)

Dear Ms. Knatz:

The Attorney General commends the City and Port of Los Angeles for their willingness to adopt strong mitigation measures to reduce the greenhouse gases that will be generated by the expansion of the TraPac terminal. The City and Port in this respect are taking a key leadership position in the maritime industry.

Current estimates predict that the total volume of containerized cargo that moves through the Los Angeles and Long Beach ports together will quadruple in the next two decades, with a commensurate increase in greenhouse gas emissions. As these expanded port operations drive the economy of the region and serve as a significant sources of new jobs, the mitigation measures adopted will be crucial to the continuing efforts to combat global warming and make the Southern Californian economy more sustainable.

The Attorney General recognizes the leadership of the City and the Port of Los Angeles in making an important commitment to address these issues. The Port is one of the first agencies in California to set the threshold of significance for greenhouse gas emissions at the project baseline, assuring that any additional emissions generated by the terminal expansion are regarded as significant under the California Environmental Quality Act (CEQA). In taking this important step under CEQA to set a threshold of significance for project-related greenhouse gas emissions, the Port assumes it proper responsibility for dealing with the profoundly serious problem of global warming and the specific greenhouse gas emissions caused by this particular terminal expansion project.

The FEIS/R appropriately includes a range of important mitigation measures to reduce the global warming impacts of the project, including an improved alternative marine power program, a progressive ban on older trucks serving the Port, and installation of solar panels throughout
compatible terminal areas, such as parking lots and backlands, among other things.

The Port is also conducting a thorough port-wide inventory of greenhouse gas emissions associated with port operations, beginning in 2008. This comprehensive look at the global warming impacts associated with port operations promises to provide the first real picture of port-related greenhouse gas emissions from the entirety of the Port’s operations, and is the first such evaluation of its kind in the world.

The Attorney General welcomes the strong commitment and support of the Mayor and the Port of Los Angeles in assessing, evaluating and addressing greenhouse gas emissions in the context of the ever-growing goods movement industry, and looks forward to working constructively with the City.

Sincerely,

RAISSA S. LERNER
Deputy Attorney General

For EDMUND G. BROWN JR.
Attorney General