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September 24, 2007

Paula McHargue
Los Angeles World Airports
1 World Way, Rm. 218
Los Angeles, CA 90045

RE: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the LA/Ontario International Airport Master Plan (SCH Number 2004071044)

Dear Ms. McHargue:

The Attorney General submits these comments to the Los Angeles World Airports ("LAWA") on the Notice of Preparation for the Draft Environmental Impact Report for the LA/Ontario International Airport Master Plan. The Notice indicates that LAWA will prepare a draft Environmental Impact Report ("EIR") and is seeking comments regarding environmental issues to address in the EIR. We are writing to express our view that LAWA must consider the global warming impacts of the project and feasible ways to mitigate those impacts in the EIR.

According to the Notice, the airport master plan will guide the development of the LA/Ontario International Airport through the year 2030. It is estimated that the number of passengers served annually at the airport will increase from 7.0 million passengers in 2006 to 33.4 million passengers in 2030, and that cargo will increase from 544,000 tons per year to 3.26 million tons.¹ At full build-out, expected to occur by 2030, the number and size of passenger terminals, gates, rental car facilities, public parking, and cargo facilities, will more than double to accommodate this growth, and there may be impacts on the surrounding roads and highways.

Implementing the master plan invariably will result in increases in emissions of greenhouse gases that cause global warming. Global warming, in turn, threatens to have serious consequences on the State of California, including the loss of snowpack, an increase of as much as 55 percent in the risk of large wildfires, reductions in the quality and quantity of agricultural production, exacerbation of California's air quality problems, and adverse impacts on human health from increased heat stress and heat related deaths, and increases in asthma, respiratory and

¹See <http://www.ontmasterplan.org/publications.cfm>.

September 24, 2007

Page 2

other health problems.² As a result, the California Environmental Quality Act (“CEQA”) requires LAWA to analyze in the EIR the incremental effect the project will have on the quintessentially cumulative environmental impact of global warming.³

Although the Notice of Preparation does not say so specifically, we understand from discussions with your office that you intend to address the project’s greenhouse gas emissions in the Draft EIR. In fact, we understand that this process already is under way. As part of the Mayor’s Green LA plan, which challenges city departments including LAWA to implement strategies to reduce emissions to 35 percent below 1990 levels by the year 2030, LAWA is conducting an audit of present emissions and evaluating measures to comply with the Mayor’s directive.⁴ The Board of Airport Commissioners, which oversees LAWA, also recently developed the Sustainability Performance Improvement Management System to track and improve sustainability initiatives, and in August it formally adopted a sustainability vision and principles that affirm its commitment to environmentally sound operations at the four airports that LAWA operates.⁵ Consistent with your efforts to date and the requirements of CEQA, we encourage you to analyze project alternatives in the EIR and to consider mitigation measures that transform these laudable objectives into enforceable requirements.

In closing, the Attorney General commends LAWA for its commitment to integrate global warming considerations and sustainability in general into its planning and operations. We look forward to seeing how this is incorporated into the airport master plan and the accompanying EIR. Please do not hesitate to contact me if the Attorney General’s Office can be of any assistance.

Sincerely,

/S/

HARRISON M. POLLAK
Deputy Attorney General

For EDMUND G. BROWN JR.
Attorney General

²Amy Lynd Luers, Daniel R. Cayan et. al, *Our Changing Climate: Assessing the Risks to California* (July 2006) at pp. 2, 10. The report was prepared by the Climate Change Center at the direction of CalEPA pursuant to its authority under Executive Order S-3-5.

³See Public Resources Code, § 21083(b); Cal.Code Regs., tit. 14, § 15065; and Cal. Code Regs., tit. 14, § 15130, subd. (a).

⁴See <http://www.lacity.org/mayor/>.

⁵See <http://www.lawa.org/news/newsDisplay.cfm?newsID=949>.