

Comments on the Draft Environmental Impact Report (DEIR) for the LAX Terminals 2 & 3 Modernization Project

In general, this may be a good project for improving the level of service at LAX. It would be a shame if LAWA, or its consultants, turns this Project into a contentious enterprise by not performing a thorough environmental impact analysis and identifying ways to mitigate any negative impacts that could arise.

The Project will add 3 gates but LAWA insists that this will not “cause or facilitate increases or decreases” in operations and passenger volumes (see section 2.6 of the DEIR). Whether it is part of this Project or not, “re-gauging” gates will create additional gate positions and result in increased capacity to handle aircraft operations or passenger flows. Simply to say that it would not is insufficient.

The EIR needs to include a capacity analysis to demonstrate this. LAWA must analyze the reconfigured apron with the additional gates in comparison to the existing layout, both done using the same current information and assumptions regarding aircraft sizes, fleet mixes, load factors, and all the “market” issues referenced in section 2.6 of the DEIR. To quote from the NCHRP Report referenced in section 2.6:

The number of seats in each ADG can vary considerably from the basic definitions. For example, larger regional jets in Group III can be in the 100- to 110-seat range, while a Group III A321 narrowbody can have over 180 seats. Similarly, as fuel economy and range become more important, most widebody aircraft are being designed with wider wingspans in Group V but may have seating capacities in the low 200s. For a given airport, it may be appropriate to modify the EQA metrics to better match the fleet mix expected when using EQA to determine some terminal facilities.

Thus the capacity analysis must explain how the additional 3 gates would not facilitate or generate additional traffic and operations. The analysis must also show how this re-gauging to add 3 gates could be done without changing the Narrow Body Equivalent Gate (“NBEG”) numbers discussed in section 2.6.

In conclusion, a solid EIR is not complete without a capacity analysis of the reconfigured apron with the additional 3 gates. This may be a good project overall, but it is being spoiled by stating off-hand that it has no impact on apron/gate capacity, instead of performing the analysis transparently.

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Professor of the Graduate School, University of California at Berkeley. Kanafani holds a Ph.D. in Civil Engineering from the University of California at Berkeley. Since joining the faculty at Berkeley in 1971 he has taught and conducted research on transportation systems, transportation engineering, airport planning and design, and air transportation economics. He has served on a number of national and international advisory panels to Government and industry. He was Director of Berkeley's Institute of Transportation Studies from 1982 to 1997, and Chairman of the Department of Civil and Environmental Engineering from 1997 to 2002, and Co-Director of the National Center of Excellence in Aviation Operations Research from 2001 to 2005.

Kanafani's important contributions to air transportation include air transportation demand analysis, airport capacity analysis methods, and airline network analysis. His research on airline hubbing and on the relation between aircraft technology and airline network structure laid the ground for much of the work aimed at understanding the implications of airline deregulation in the late 1970's. He was a member of the research team that developed airport capacity analysis methods that are in widespread application in airport planning and design. Professor Kanafani has authored over 170 publications on transportation, including three books on Transportation Demand Analysis, on National Transportation Planning, and on the Economics of Networked Industries. He is a recipient of numerous including election to the U.S. National Academy of Engineering in 2002. He served as Chair of the Air Transport Division of the American Society of Civil Engineers, and as chair of the Transportation Research Board of the National Academies in 2009 and was named a Lifetime Associate of the National Academies in 2012.

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