

2

must meet conformity. If a conditional approval is not a Federal action for the purpose of conformity, and if the activities to be fully approved are separate and independent from the conditionally approved activities, then a conformity finding is not needed for the conditional approval. Irrespective of this, a conformity finding must be made for the unconditionally approved project. Thus, based on available information, it appears that the FAA proposed approach will satisfy our concerns regarding the limits on segmentation in the conformity regulations. Further, as we stated in our prior letter, we expect that as air quality issues are discovered through modeling or monitoring, appropriate mitigation actions will be pursued in conjunction with the state.

Regarding the question of construction emissions and de minimis levels established by the conformity regulations, non-road construction emissions are reasonably foreseeable. We understand FAA's reluctance to calculate emissions without the certainty of a contract being let. However, as with other portions of the Environmental Impact Statement, we believe it is possible to create a likely or even conservative scenario of non-road carbon monoxide (CO) emissions. Reasonably foreseeable emissions are broadly defined in the General Conformity rule. Further, while the rule does not require an agency to conduct a conformity determination for all emission scenarios, it does require that the conformity determination be based on a reasonable expectation of future activity resulting from a Federal action. Yet it should also be noted that in the case of this Master Plan, the environmental impact of non-road CO emissions on the intersections analyzed for the activity that would be approved is not likely to be significant. Due to the rapid dispersion rate of carbon monoxide and the location of most of the non-road emissions sources, we understand and agree with FAA's assertion that it is unlikely that non-road emissions will significantly affect the CO concentrations at the intersections evaluated in the hot spot analyses. As we have discussed in past meetings, emissions from cars and other mobile sources have the largest impact on CO concentrations at these intersections. Further, it should be noted that the FEIS did address the more important transportation emissions associated with construction. Thus with the additional modeling that the Port has committed to, our concerns on construction have been addressed.

Whether to use non-oxygenated or oxygenated gasoline in the analysis is less certain. The current State Implementation Plan does mandate the use of oxygenated fuel, while the recently submitted maintenance plan presumes a switch back to non-oxygenated gasoline. On June 11, 1996, EPA proposed to approve the maintenance plan (61 FR 29515-29518). However, our proposed approval came several months after the publication of the FEIS. However, because during the development of the FEIS, the regulatory agencies had discussed this proposed change with FAA, it would have been a more conservative analysis to assume the use of non-oxygenated gasoline in analyzing air quality impacts. Yet due to the circumstances surrounding the timing of EPA's proposed approval, the use of oxygenated fuel does not appear to be a violation of the conformity provisions. Nonetheless, as discussed in our letter to you dated June 6, 1996, it is still requisite upon the FAA to demonstrate to the public that the use of reformulated gas in its analysis results in equivalent or comparable impacts to the use of oxygenated fuel. The Record of Decision should include an analysis and discussion of both fuels.

Your letter asked for confirmation on the adequacy of evaluating four intersections using the CAL3QHC model to determine CO concentrations. In discussions with your agency, EPA did raise concerns that additional intersections should have been evaluated with a switch to non-oxygenated gasoline and its concomitant higher CO emissions. Again, we believe that a

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(bypassing Sea-Tac Area by 6 miles to the East in Renton ~~then Kent, to Auburn and~~ ending in Enumclaw by ozone monitor) had single highest monitoring at 0.08 ppm NOx.

Final EIS

existing
CAL3QHC Model intersection analysis predicts 8 hour carbon monoxide NAAQS exceedances of 9.0 ppm at South 188th and South 170th along International Boulevard. Screened rates of 18.0 ppm are reduced in the refined analysis, however, the 12.0 ppm 8 hour CO at South 188th has no planned mitigation until the year 2010. Mitigation is expected to reduce project related increases to 12.0/11.0 ppm 8 hour, still above 9.0 which predictions are also assuming auto emission improvements, the possibility of light rail, other interim roadway modifications (not anticipated to accommodate additional traffic, but rather aid in reducing intersection idling and queuing), and both 509 freeway extension and I-5 additional HOV lane as reliever to SR99. (International Blvd)

Metrosonics monitored an 8 hour carbon monoxide level (indoors, but in area of public access) at the airport at 10.0 ppm. PSAPCA letter states that the monitoring cannot be used to judge existing levels because it was improperly cited according to EPA criteria.

A number of contributory projects have not been considered additive or cumulative in any of four EIS air quality analyses. A maintenance base for aircraft engine testing and run-ups predicts several thousand tons per year of criteria pollution will be released into the atmosphere, but although this base will be interconnected to Sea-Tac, neither EIS considers the other for cumulative effects. Estimated existing condition totals of criteria and hydrocarbon emissions generated from Sea-Tac are 26,000 tons per year. This figure puts the airport at the upper end of the most polluted by area in the U.S. CTI EIS, a biochemical manufacturing facility, planned for Port owned property just south of the airport, will generate VOC, NOx and CO emissions from the chemical process and vessels. VOCs are not named and quantity of emission rates have not been given due to a secretive nature of the new compound. A new Federal Detention Center (under construction) will generate additional automobile traffic and heating emissions not considered in any cumulative analysis. 509 draft EIS air quality analysis differed from the airport EIS. There are several smaller nearby projects all considered for an area less than five miles in diameter.

ASIL Violations

McCulley, Frick and Gilman conducted an air quality survey of Sea-Tac Airport in 1993 using EPA approved equivalence method sampler TO-14, 11. Hydrocarbons and aldehydes exceeding the ASIL are not comparable to the annual acceptable levels for the limited period of the testing, however, there is no indication that these levels would be reduced throughout the year unless they are ambient and not airport source related, which has not been proven. Nor can the sampling be strictly representative of short-term high,

at this peak period? How?

On page 2-36, how many transit busses which presently use International Blvd. from the south will use South Access instead since it is a freeway which does not connect with existing bus routes? Will bus routes be revised? Will enough busses use South Access during peak hour periods or otherwise to justify the need? Does the idea of busses using South Access as an alternate route to International Blvd. improve the level of service along International Blvd? Which study year(s)?

Are HOV lanes guaranteed to be part of 509 or are they merely an idea to improve service on this presently underused roadway? Most of the time, mitigation measures that are not guaranteed in writing with a specific funding commitment, are not implemented or are delayed. What exactly are the plans for HOV?

Are the statements on page 2-38 about truck routes connecting with the Port of Tacoma and Seattle and associated industrial areas speaking about existing industrial areas or those that are planned but not yet implemented? The existing industrial areas between Seattle and Tacoma are Seattle and Tacoma, Duwamish and Tideflats. Is this a vague reference to the industrial projects the Port has planned for an area in the middle of Tacoma and Seattle which roughly coincides with Sea-Tac Airport area? Some industrial development is presently planned, but construction has not yet begun. There will be strong community opposition to industrial development near neighborhoods surrounding the airport. Additionally, any turnover of land uses along 509 corridor as the draft indicates will occur, will be devastating to a large area who depend on the residential land uses and consumers to support local jurisdictions and schools.

Does WSDOT, like the Port, actually believe that the southend area of what was once beautiful homes, quiet neighborhoods and some of the finest schools in the state, deserve this kind of treatment?

Air Quality

WSDOT needs to justify why their air quality analysis for the design year 2003 does not indicate violations of the CO 8-hour NAAQS standard, where the MPU does do so at numerous intersection corners through 2020 and most likely, beyond. The modeled intersection at 188th and International Blvd. shows estimated 8/hour CO at 7.4 ppm in 2003 and 6.9 in 2020 where the draft EIS MPU has 13.16, 12.18, 11.55 and 10.43 for 1994, 2000, 2010 and 2020 respectively. The design year of 2003 compared to 2000 for the MPU is different at the southwest corner of the intersection by over 4.7 ppm. This value is double the difference between background levels used in the two documents. WSDOT should discover whether the model is flawed or the error occurred in WSDOT calculations of traffic volume/fleet mix or whether the Port consultant erred.

March 4, 1997

Mr. Dennis Ossenkop
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**Comments Regarding the Transportation and General Conformity Determination
for the Sea-Tac Airport Master Plan Update Draft, Final and Draft Supplemental
Environmental Impact Statements**

Dear Mr. Ossenkop:

- 1) I do not agree that the FAA is exempted from a General Conformity determination as the FAA asserts in the Draft Supplemental Environmental Impact Statement (SEIS).
- 2) I also do not concur that if FAA were subject to a general conformity analysis that they would pass the test as FAA also states in the SEIS. According to the FAA, the Clean Air Act (CAA) and Amendments of 1990 require as a prerequisite for the necessity to perform a general conformity analysis, that certain de minimus levels of pollutants be exceeded. These de-minimus levels, FAA believes, are not exceeded in the SEIS analysis and air pollution inventory tons per year.
- 3) I believe FAA's assertion that they are exempt and their claim of compliance if subject to such a review is based upon flawed data input into the model, a misunderstanding of the intent of the law and a possible predisposition to manipulate the data input to eliminate their responsibility to the public and the Clean Air Act.
- 4) I also believe that even if FAA were exempted from general conformity by being below de minimus levels, that the predicted exceedances of the NAAQS NO₂ annual standard, 8 hour carbon monoxide standard and the 24 hour and annual PM₁₀ standard, (some of which is project related, [foreseeable direct and indirect emissions within the authority of the FAA/Port of Seattle's jurisdiction and/or control¹], while others cannot be mitigated and none of which considers cumulative impacts) would not allow FAA to fund, support or approve the project.

I would appreciate a response from FAA to not just my direct questions, but also to each of my comments and include information according to the following chapter of NEPA:

¹See FR Vol. 58, No. 228 page 63221, particularly, see definition of reasonably foreseeable direct, indirect, exclusive and support.