

Given the EIS's projected increases in the severity of exceedances of the CO NAAQS, mitigation measures meeting the requirements of 93.160 are necessary in order to demonstrate conformity.

Changes in Mitigation Measures

It should be noted that the general conformity rule also foresees situations where mitigation measures may need to be modified in the future due to changed circumstances. Section 93.160 (e) establishes the mechanism where mitigation measures may be modified so long as the new mitigation measures continue to support the conformity determination. While the mitigation measures need to be clearly specified, they may be changed, if needed.

The results from a monitoring program, such as the type identified in the EPA, WDOE, and PSAPCA comment letters of June 6, 1996, may form the basis for modifying mitigation measures. Air quality analysis based on such monitoring and related modeling could demonstrate that mitigation measures committed to in order to demonstrate conformity were no longer needed, or that different or additional measures were appropriate.

Alternative to Mitigation Measures

One alternative approach to determining conformity that would not necessarily include mitigation measures might be a phased development of the project. With this option, FAA would grant a full approval for certain projects that are proposed in the FEIS while conditionally approving implementation of other projects contingent upon further environmental analysis. This assumes that the projects are truly separable, and therefore that the FAA would be able to show conformity for each of the major subsets of proposed projects. It should be noted that both the general conformity rule and NEPA regulations identify criteria for determining when projects can be assessed separately. Both sets of criteria would need to be met. If this approach is used, then the monitoring program supported by EPA, WDOE, and PSAPCA would be useful to support the modelling that would be required to demonstrate conformity for the conditionally approved projects. Elements of such an approach are set out in the PSAPCA letter to FAA, dated June 6, 1996.

Cumulative Impacts

The Council on Environmental Quality Regulations for Implementing the Provisions of The National Environmental Policy Act state in 40 CFR Part 1502.16(a) and (b) that the Environmental Consequences section of an EIS will include discussions of direct effects and their significance and indirect effects and their significance (section 1508.8). According to 40 CFR Part 1508.8, cumulative impacts are considered "effects" and should therefore be discussed in this section of the EIS. A Cumulative Impact is the effect "on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." (Section 1508.7) We believe the ROD should reflect consideration of the cumulative impacts of the following projects since they may affect one another: Seatac expansion, the SR 509 proposal, the South Aviation Support Area, the