15. Cumulative Impacts

15.1. Past, Present, and Reasonably Foreseeable Future Actions 15-1
15.2. Defining the Study Area 15-2
15.3. Significance Determination 15-2
15.4. Mitigation 15-2
15.5. Presentation of the Analysis Results 15-3

The Council on Environmental Quality (CEQ) Regulations define a *cumulative impact* as "the impact 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" (see 40 CFR § 1508.7). Cumulative impacts can be viewed as the total combined impacts on the environment of the proposed action or alternative(s) and other known or reasonably foreseeable actions.

Cumulative impacts should be considered as early as possible in the project development process, as early identification of potential cumulative impacts may help in the design of alternatives or mitigation measures that minimize a project's impacts on the environment. If it is determined that there would be no cumulative impacts, clearly document the basis for that conclusion.

The depth of a cumulative impacts analysis should be commensurate with the potential for significant impacts. The scope and extent of the analysis will vary by project type, geographic location, potential to impact resources, and other factors such as the current condition of potentially affected impact categories. While significant impacts of FAA actions tend to be primarily in the airport vicinity, the consideration of cumulative impacts is not limited to the airport or near the airport. The analysis should focus on impacts that are truly meaningful to decision-makers.

For more information on cumulative impacts analysis, see CEQ's *Considering Cumulative Effects Under the National Environmental Policy Act* (January 1997), available on CEQ's NEPA website at: http://energy.gov/sites/prod/files/nepapub/nepa_documents/RedDont/G-CEQ-ConsidCumulEffects.pdf.

15.1. Past, Present, and Reasonably Foreseeable Future Actions

Past, present, and reasonably foreseeable future actions must be considered in determining whether there are potential cumulative impacts. Actions can be initiated by any entity (i.e., other Federal agencies, state, tribal, or local governments, or private entities).

Past actions are actions that occurred in the past and may warrant consideration in determining the environmental impacts of an action. The FAA has discretion to determine whether, and to what extent, information about the specific nature, design, or present impacts of a past action are useful for the analysis of the impacts of the proposed action and alternative(s). Present impacts of past actions that are relevant and useful are those that may have a significant cause-and-effect relationship with the direct and indirect impacts of the proposed action and alternative(s). For example, past industrial or military activities may have contaminated portions of a project site.

See CEQ's *Guidance on the Consideration of Past Actions in Cumulative Effects Analysis* (June 2005) at: http://energy.gov/sites/prod/files/nepapub/nepa_documents/RedDont/G-CEQ-PastActsCumulEffects.pdf.

Present actions are any other actions that are occurring in the same general time frame as the proposal. Examples include: 1) new approach procedures proposed at an airport where a terminal expansion project is underway; or 2) a state transportation department implementing roadwork on a nearby thoroughfare. Such actions may have traffic, noise, or other environmental concerns that should be considered in conjunction with those that would be generated by the FAA proposed action and alternative(s) under consideration.

Reasonably foreseeable future actions are actions that may affect projected impacts of a proposal and are not remote or speculative. Reasonably foreseeable future actions should be considered for each future time frame evaluated in the NEPA document. An action may be reasonably foreseeable even in the absence of a specific proposal. Coordination with other agencies and local governments and review of planning documents, if available, can be helpful in identifying reasonably foreseeable future actions. For example, the local government may have plans describing future actions for developing a property adjacent to where new aviation infrastructure is proposed. Future actions not grounded in planning documents, projected development trends, or regional or local plans would typically be considered remote and speculative, and thus need not be analyzed. In addition, future actions may be considered improbable or remote even though they have been mentioned in planning documents (e.g., general statements about future growth opportunities and unrefined lists of potential projects). Such actions should be mentioned in the NEPA document with an indication that they are not reasonably foreseeable.

15.2. Defining the Study Area

The study area for cumulative impacts analysis is the same area defined for a project's direct and indirect impact analysis (see the Introduction and the Affected Environment sections of Chapter 1 to 14 of this Desk Reference). Thus, the study area will be different for each impact category.

15.3. Significance Determination

The significance of cumulative impacts should be determined in the same manner as the significance of direct and indirect impacts (see the Significance Determinations sections of Chapter 1 to 14 of this Desk Reference). In some cases, cumulative impacts from other proposed or implemented project(s) in conjunction with the direct and indirect impacts from the proposed action or alternative(s) may together yield significant impacts and lead to a finding of significance, even though the direct and indirect impacts from the proposed action or alternative(s) alone are not significant. Consultation with agencies having special expertise or jurisdiction regarding a specific impact category can also assist in determining the significance of cumulative impacts.

15.4. Mitigation

Cumulative impacts may influence the mitigation considered for the proposed action. The FAA's consideration of mitigation would not extend to mitigating impacts of non-FAA actions.

15.5. Presentation of the Analysis Results

The best location(s) for the cumulative impacts analysis in a NEPA document will vary by project. In some cases, presentation of the cumulative impacts analysis may be clearest and most effective in an independent section or chapter that details all cumulative impacts by impact category and alternative and describes how they are interrelated. In other circumstances, the cumulative impacts analysis may be easier for the decision-maker to understand when included within the discussion of each individual impact category.