SAN FRANCISCO REDEVELOPMENT AGENCY
SAN FRANCISCO PLANNING DEPARTMENT

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Date Issued: March 23, 2010 **Respond by: April 22, 2010**

PROJECT TITLE: INDIA BASIN SHORELINE REDEVELOPMENT PROGRAM

As Co-Lead Agencies, the Redevelopment Agency of the City and County of San Francisco ("San Francisco Redevelopment Agency" or "Agency") and the Planning Department of the City and County of San Francisco ("San Francisco Planning Department" or "Department") are planning to prepare and Environmental Impact Report ("EIR") on the proposed India Basin Shoreline Redevelopment Program ("Project"). Pursuant to California Environmental Quality Act ("CEQA") Guidelines Sections 15060 (Preliminary Review), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), the Agency and Department have determined that an EIR will be required because the proposed actions may be associated with potentially significant adverse impacts on the environment.

The Project consists of both program elements and project elements, as described on the following pages. This EIR is a redevelopment project EIR pursuant to CEQA Guidelines Section 15480, a program EIR for the program elements pursuant to CEQA Guidelines Section 15168, and a project EIR for the project elements pursuant to CEQA Guidelines Section 15161.

The Agency and Department seek your comments on the scope and content if environmental information to be provided in the forthcoming EIR. Please email or mail your response to this Notice of Preparation to : Stanley Muraoka, Environmental Review Officer, San Francisco Redevelopment Agency; One South Van Ness Avenue, Fifth Floor, San Francisco, California 94103 (Email: Stanley.Muraoka@sfgov.org). Due to the time limits mandated by State law, your response to this Notice of Preparation must be received no later than **5:00 PM on Thursday, April 22, 2010**.

If you work for an agency that is a **Responsible or a Trustee Agency**, we need to know the views of your agency as to the scope and content of the environmental information that is relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. We will also need the name of a contact person for your agency.

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FILE NO. ER12.01.09

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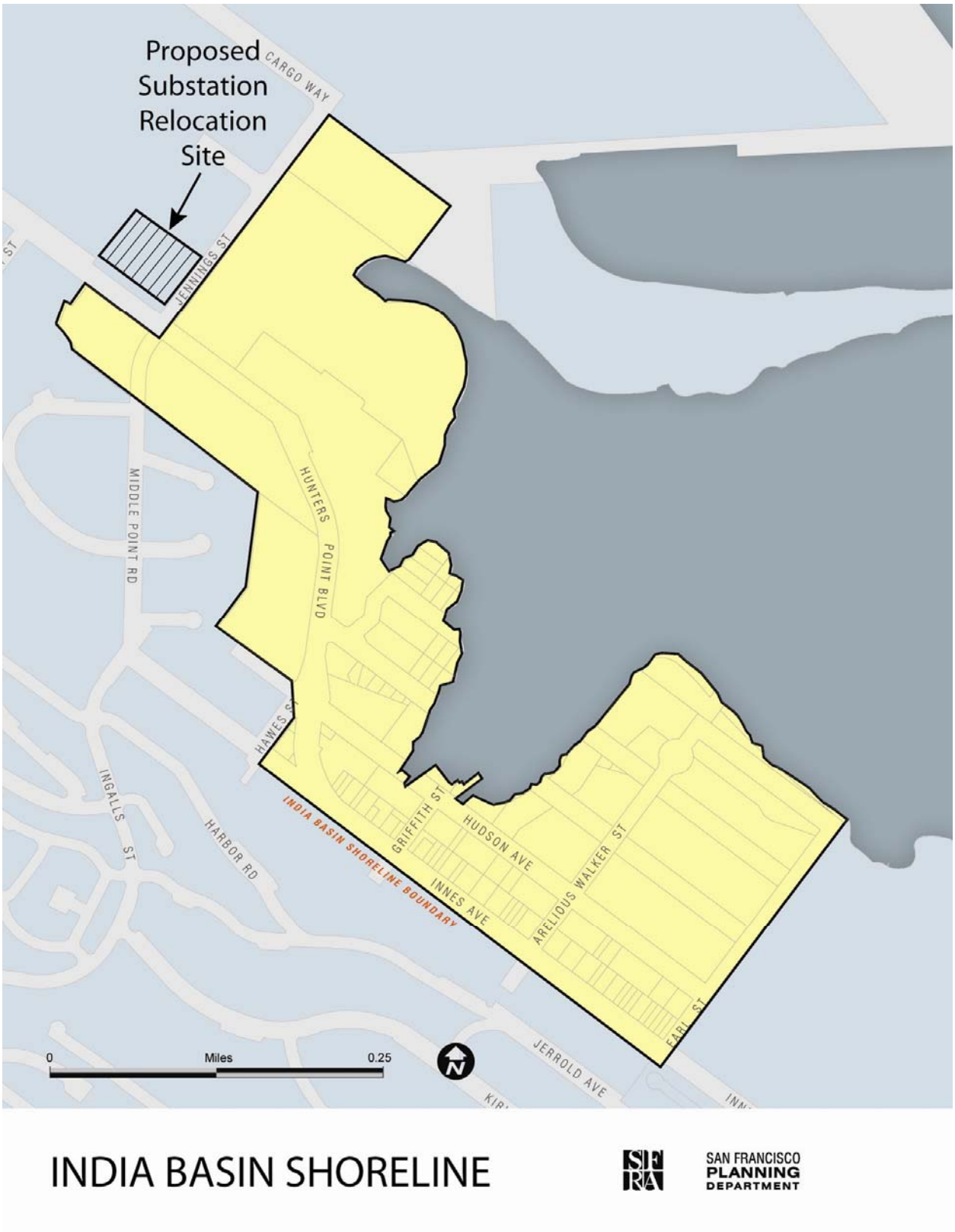
Figure 1 – Project Location



PROJECT LOCATION: India Basin Shoreline is a 76-acre area of Bayview Hunters Point ("BVHP") in southeastern San Francisco, bounded generally by Jennings and Newhall Streets and Heron's Head Park to the north, the San Francisco Housing Authority ("SFHA") Hunters View public housing sites and Innes Avenue to the west and south, and Earl Street and the Hunters Point Shipyard to the southeast. India Basin and the San Francisco Bay form the northeastern border of the Project area (see Figure 1). This Project area is adjacent to and east of the Bayview Hunters Point Redevelopment Project Area.

CURRENT LAND USE: Existing land uses in India Basin Shoreline include residential, industrial, public shoreline open space, India Basin Shoreline Park, and vacant land. Residential uses, with some commercial uses, generally front onto Innes Avenue. Industrial uses are interspersed among residential uses near the shoreline, including a non-operational boatyard on India Basin east of Innes Avenue. Activities at the boatyard are limited by tidal flows and shallow water depth.

One of the largest vacant properties in India Basin Shoreline is a 13.5-acre privately owned parcel fronting the Bay northeast of Innes Avenue and bisected by Arelious Walker Drive. This site is referred to as the "India Basin Flats." The shoreline band adjacent to India Basin Flats site is open space owned by the San Francisco Recreation and Park Department.

The former PG&E Hunters Point Power Plant, on a 33-acre site near Jennings Street and Hunters Point Boulevard, has been dismantled ("PG&E site"). The existing adjacent PG&E switching substation remains operational. A former PG&E fuel tank site, where the tanks have been removed, is directly across Hunters Point Boulevard from the PG&E site. Building pads from former military housing are also on the hillside south of the former tank farm site.

PROJECT DESCRIPTION: The India Basin Shoreline Redevelopment Program includes new land use controls for the India Basin Shoreline in BVHP in the southeastern portion of the City and County of San Francisco ("City"). This area forms BVHP Redevelopment Survey Area C ("Area C"). Although the Area C was included in the original BVHP Redevelopment Survey Area, which stretched west to east from U.S. Highway 101 to India Basin and San Francisco Bay and from north to south from Cesar Chavez Street to the San Francisco – San Mateo county line, it was not part of the *Bayview Hunters Point Redevelopment Plan ("BVHP Redevelopment Plan")* adopted in 2006 because it was determined that further community-based planning would be necessary before the India Basin Shoreline could be added into the *BVHP Redevelopment Plan*. As a result, the India Basin Shoreline has remained as a redevelopment survey area.

The Project consists of both program elements and project elements. The program elements establish the land use plan, the overall allowable development, the transportation network, and development controls and guidelines. The project elements are specific actions that facilitate implementation of the Redevelopment Program.

Program Elements

The India Basin Shoreline Redevelopment Program includes four program elements: (1) an amendment of the *BVHP Redevelopment Plan* that would add the India Basin Shoreline to the BVHP Redevelopment Project Area; (2) an *India Basin Shoreline Subarea Plan* component of the *Bayview Hunters Point Area Plan* element of the *San Francisco General Plan ("General Plan")* along with possible amendments of other *General Plan* elements; (3) an India Basin Shoreline Special Use District ("SUD") would be added to the *San Francisco Planning Code* and associated Zoning Maps; and, (4) *India Basin Shoreline Design*

Guidelines. The program elements would allow a largely industrial zoned area to support a mix of residential, commercial, and light industrial uses and new zoning, height districts, and design guidelines would regulate future development in this area. The India Basin Shoreline program elements assume that various private parties would develop this area over time, as almost all of the lots within the boundaries of India Basin Shoreline that are not designated as open space are privately held.

Project Elements

The India Basin Shoreline Redevelopment Program includes four project elements, each of which facilitate implementation of the Redevelopment Program project: (1) Hudson Avenue Improvements that create a bicycle and pedestrian connection parallel to Innes Avenue; (2) Innes Avenue Streetscape Improvements to improve the livability and character along Innes Avenue; (3) the Hunters View Stairs project that will provide a pedestrian connection between the Hunters View development on Hunters Point Hill and the India Basin Shoreline; and (4) the Hunters Point Substation Relocation project, which would consist of the demolition and relocation of the existing 115 kilovolt (kV) to 12 kV PG&E switching substation.

Project Objectives

The India Basin Shoreline Project area is within the Hunters Point Shoreline Activity Node, identified in the *Bayview Hunters Point Community Revitalization Concept Plan* ("*Concept Plan*"), that was adopted by the Bayview Hunters Point Project Area Committee ("PAC") in March 2002. The PAC advises the Agency on redevelopment activities in BVHP, including the India Basin Shoreline. The vision for change at the India Basin Shoreline builds on the goals and objectives for the area contained in the *Concept Plan***.** A focused community planning process for the India Basin Shoreline began in August 2007 to refine the general vision and goals contained in the *Concept Plan.* The purpose of this planning process is to define the desired land uses, design guidelines and community benefits for the area in more detail than was contained in the *Concept Plan*. The following planning objectives were developed through the current India Basin Shoreline Redevelopment Program planning process and builds on the *Concept Plan*:

1. Development and Design:
    - Create a mixed-use community;
    - Balance job generating commercial uses and new housing development;
    - Provide a diversity of housing types and affordability levels;
    - Create opportunities for neighborhood-serving retail and emerging green industries;
    - Encourage architecture and landscape design that celebrates the maritime history and waterfront context of India Basin Shoreline;
    - Ensure that buildings respond well to area streets, open space and the waterfront; and
    - Ensure high-quality, sustainable design.
2. Open Space and Sustainability:
    - Enhance physical and visual access to the waterfront;
    - Expand open space, recreational opportunities and community facilities;
    - Plan for green and energy efficient infrastructure;
    - Preserve and enhance critical habitats; and

- Ensure full soil remediation in the area.

3. Transportation and Street Design:
   - Implement traffic calming strategies for Innes Avenue/Hunters Point Boulevard;
   - Create new roads and sidewalks with walkable "green" designs;
   - Improve pedestrian safety, comfort and circulation; and
   - Enhance transit service and bike access to the area.

Project Characteristics

The proposed India Basin Redevelopment Program would allow the largely industrial zoned India Basin Shoreline area to develop as a mix of residential, commercial and industrial uses. Program elements would include an amendment to the existing *BVHP Redevelopment Plan*, the *India Basin Shoreline Subarea Plan* amendment to the *General Plan*, the India Basin Shoreline Special Use District that would be added to the *Planning Code* and would include new zoning and development controls, and the *India Basin Shoreline Design Guidelines*. The *Redevelopment Plan* Amendment proposes to add the India Basin Shoreline Area to the existing BVHP Redevelopment Project Area. The *Sub-Area Plan* describes the broad land use, urban design, community benefits and circulation plans for the area. The proposed SUC and associated amendments to the planning code and zoning maps would reflect the land uses and development concepts described in the Sub-area plan. Further, *Design Guidelines* would specify architectural and urban design goals and will guide future development proposals.

The Project would permit a potential maximum build out presented in Table 1. The majority of the Project area is currently zoned for industrial uses (M-1 and M-2) with portions zoned for neighborhood commercial zoning (NC-2) and public use (P). Overall, the Project does not contemplate more development than that currently permitted by the existing zoning. Portions of India Basin Shoreline could accommodate greater densities and/or heights than existing zoning, while limiting densities elsewhere.

The India Basin Shoreline Redevelopment Program would result in a maximum build out of up to 1,240 new housing units, up to 1,365,000 gross square feet (gsf) of commercial space (office and light industrial), up to 100,000 gsf of new retail space, and up to 300 hotel rooms with a conference center up to 60,000 gsf. The distribution of uses across India Basin Shoreline could vary, but would be within the maximum build out described above.

Table 1
India Basin Shoreline, Potential Build Out

Residential (units)	1,240
Retail (gsf)	100,000
Commercial/R&D/Green-Tech (gsf)	1,365,000

SOURCE: Redevelopment Agency and Planning Department, February 2010.

The EIR will analyze an overall land use program for the India Basin Shoreline as a detailed site plan has yet to be undertaken. It is anticipated that the rezoning and other planning controls for the India Basin Shoreline would reflect community goals expressed earlier during BVHP planning to provide:

- New housing on available infill development sites northwest of Innes Avenue
- Mixed-use neighborhood southeast of Innes Avenue
- Small industrial or R&D businesses
- Neighborhood-serving retail and commercial services and some residential units
- Water-oriented neighborhood
- Space for artists
- New waterfront open space and recreational activities

Land Use Plan

As a part of the *India Basin Shoreline Subarea Plan*, a conceptual land use plan provides a way to organize the larger project area into four smaller land use districts and an overlay shoreline zone, each with a different emphasis.

Waterfront Mixed-Use District

The Waterfront Mixed-Use District would encompass the 13.5-acre vacant site known as India Basin Flats. This district would accommodate a mix of housing, commercial and visitor- and neighborhood-serving retail uses that would take advantage of the site's proximity to the Bay. Residential uses could include apartments and town homes along Innes Avenue. Height controls would encourage buildings to step down toward the Bay with maximum allowed heights reduced along most Bay fronting portions of the project site. Similarly, housing densities would decrease closer to the Bay. Retail would also be allowed in this area. In addition, commercial uses in this district could include a visitor-serving use, such as a hotel, conference center, or public recreation facilities.

Neighborhood Maritime Center District

The Neighborhood Maritime Center District, framed by India Basin Shoreline Park, Innes Avenue, and Griffith Street, would be the focal point of the area and could include a variety maritime-related visitor and recreational uses, limited light-industrial (including artists, artisan uses, boat building, and maritime related uses), waterfront-oriented retail, and residential uses. Residential uses would be allowed above ***g***round-floor retail and office uses. Commercial uses in this district could include some visitor uses.

Hillside Transition District

The Hillside Transition District would include predominantly residential uses along Hunters Point Boulevard, across from the former PG&E Hunters Point Power Plant site and India Basin Shoreline Park. These land uses would relate to both the Hunters View public housing site above the Project area and new commercial uses on the PG&E site.

Mixed Use Employment District

The Mixed-Use Employment District would encompass the former power plant site (the tank sites are residential) 35-acre PG&E site. This district would accommodate a range of commercial, light-industrial, and retail uses with a focus on uses that would create new jobs. While the intent of the district is to reserve a place for job-creating uses, the ability to accommodate in emerging industries such as green technology or biotechnology. Commercial uses could include R&D, office, and a visitor-serving use, such as a hotel or conference center. Retail uses could occur along Jennings Street and would serve other uses in the district. Residential uses may be permitted in a portion of this district.

Shoreline Access Recreation Zone

The Shoreline Access Recreation Zone would extend along the entire shoreline of the Project area. Land uses within this area would prioritize waterfront access and recreational uses. The *India Basin Shoreline Subarea Plan* envisions improved public open space along the Bay shoreline and some upland areas and improvement or completion of the Bay Trail along the entire length of the India Basin Shoreline. Existing open space in the Project area includes India Basin Shoreline Park and unimproved San Francisco Recreation and Park Department property on the Bay periphery of India Basin Flats. A portion of the India Basin Flats could be a priority for future open space and a new park near the India Basin Flats waterfront could be part of future development on that site. That park could contain a new recreation center with a focus on maritime activities, such as equipment rentals, classes, and concessions, other recreational facilities, and a non-motorized boat launch area. The *India Basin Shoreline Subarea Plan* also envisions, as part of redevelopment of the PG&E site, an improved shoreline open space connection between India Basin Shoreline Park and Heron's Head Park to the north. This connection would upgrade existing portions of the Bay Trail and would tie in to Bay Trail improvements proposed in the Candlestick Point - Hunters Point Shipyard Development Plan. A portion of the hillside area owned by PG&E across Innes Avenue from the India Basin Shoreline Park has also been identified as a priority location for future open space.

Zoning Districts

In general, the Project proposes to change the existing zoning in the area from industrial to mixed-use zoning and neighborhood commercial classifications. The Project will create an India Basin Special Use Districts for the two largest properties in the area, the PG&E site and India Basin Flats. Mixed-Use Office ("MUO") would form the underlying zoning district. The SUD will tailor the permitted uses and controls to specific areas within the MUO district. The MUO district is designed to encourage office uses and housing, as well as small-scale light industrial and arts activities. Nighttime entertainment would be permitted as a conditional use. Dwelling units and group housing would be permitted, while demolition or conversion of existing dwelling units or group housing would also require conditional use authorization. Family-sized housing would be encouraged. Office, general commercial, most retail, production, distribution, and repair uses would also be principal permitted uses. Large hotel, adult entertainment and heavy industrial uses would not be permitted. In addition to uses, the new zoning would create a range in building heights, reducing height limits in some areas and increasing allowable heights to a maximum of 65 feet in other areas.

Transportation Improvements

The Project would include transportation improvements that would facilitate implementation of the program elements described above. The Project includes a number of potential transportation improvements. The new circulation network would improve connections to surrounding neighborhoods and amenities, and would provide a range of transportation options, including improvements for pedestrians, bicyclists, transit, and automobiles. Griffith Street would also eventually be improved to City standards, creating a connection to the waterfront. New roadway networks would also be developed within the Project area, to serve future uses on the PG&E site and on India Basin Flats. Furthermore, a number of transportation improvements are analyzed in this EIR at the project level, including the Hudson Avenue Bridge, the Innes Avenue Streetscape Improvements, and the Hunters View Stairs.

Hudson Avenue Improvements Project Element

The *India Basin Shoreline Subarea Plan* envisions that portions of Hudson Street, an unimproved public right-of-way that parallels Innes Avenue, would be improved to City standards. Hudson Street would be improved from Hunters Point Boulevard south to a potential connection to the proposed Hunters Point Shipyard Phase II Development. A portion of Hudson Street, near its intersection with Griffith Street would need to be raised to make it a functional public way. Alternatively, Hudson Avenue could be improved with a bridge structure. In addition, several private industrial uses have encroached on the Hudson Street right-of-way and would need to be removed.

Innes Avenue Streetscape Improvements Project Element

Innes Avenue streetscape improvements will include a reconfiguration of the Hawes Street and Innes Avenue intersection that will improve traffic conditions for pedestrians and bicyclists. Improvements to Innes Avenue would also include new street trees and sidewalk plantings, furnishings, raised crosswalks, paving and striping treatments and possible curb extensions (or bulbouts).

Hunters View Stairs Project Element

A public stairway connecting the India Basin Shoreline Park and the SFHA Hunters View would be constructed through the Hillside Transition District.

PG&E Substation Relocation Project Element

In addition to the transportation project elements described above, the EIR includes a project level evaluation of the proposed relocation of the PG&E Substation. PG&E has been requested to demolish and relocate the existing 115 kilovolt (kV) to 12 kV Hunters Point Substation at 1000 Evans Avenue in order to free the existing substation site for other shoreline uses. Relocation of the Substation is under the discretionary permitting jurisdiction of the California Public Utilities Commission, which would need to authorize the Substation relocation and would rely on the EIR's project-level evaluation of the relocation as part of its authorization. The new Hunters Point Substation would be rebuilt on an approximately 1.84-acre site outside of the Project area to the north and west of the intersection of Evans Avenue and Jennings Street.

The relocated Hunters Point Substation would be a remotely controlled, indoor / outdoor facility that would require only periodic maintenance. As with the existing substation, electric power would enter the station at 115 kV and would leave the station at 12 kV from existing PG&E transmission and distribution power lines located within Evans Avenue.

Other components of the relocated substation would include a perimeter fence around the station itself, interior lighting for the station, and telecommunications equipment for protection of the station and power lines in the event of a damaged line.

The relocated substation would occupy the entire approximately 1.84-acre site. The substation would be landscaped and set back approximately 10 feet from the City street right of way. In accordance with standard California Public Utilities Commission and PG&E power line safety practices, the landscaping would be designed to meet the minimum clearance requirements in a 115 kV transmission line right of way.

PROJECT APPROVALS AND IMPLEMENTATION: The India Basin Shoreline Redevelopment Program requires numerous review and approval actions from the San Francisco Redevelopment Agency, the City and County of San Francisco, regional agencies, state agencies, and federal agencies, including:

San Francisco Redevelopment Agency Commission

City and County of San of San Francisco

Planning Commission
Municipal Transportation Agency
Department of Public Works
Board of Supervisors

Regional Agencies

San Francisco Bay Conservation & Development Commission

State of California

State Public Utilities Commission

Federal Agencies

US Army Corps of Engineers

PROBABLE ENVIRONMENTAL EFFECT TOPICS: The proposed Project could result in potentially significant adverse effects on the environment. As required by CEQA, the EIR will evaluate those effects, identify mitigation measures and analyze whether the identified mitigation measures would reduce the environmental effects to less than significant levels. The Plans and Policies section of the EIR will discuss any inconsistencies between the India Basin Shoreline Redevelopment Program and the *BVHP Redevelopment Plan*, the City's *General Plan* and its relevant elements, and other citywide and regional planning documents.

The environmental impacts sections of the EIR will likely address the following environmental issues. Where appropriate, technical studies completed for the proposed adjacent Candlestick Point – Hunters

Point Shipyard Phase II Development Plan Project will be used as the basis for the environmental analyses.

Land Use and Zoning

Land use and zoning impacts that would result from implementation of the Project will be evaluated. The Project will be evaluated for compatibility with existing and planned surrounding land uses. This section also will address existing zoning and height/bulk classifications, existing general plan policies and proposed land use changes and changes to zoning and height/bulk classifications.

Visual Resources

The EIR will describe important views from public places and view corridors in the Project vicinity. Public places comprise open space along the Bay, such as India Basin Shoreline Park, and Heron's Head Park. The EIR will include assessment of the impact of the Project on important views, major vistas, urban form, and design and an evaluation of the changes to the form of sites based on height, bulk, massing, and architectural context of surrounding buildings and topography. The EIR will also include a discussion of light and glare impacts.

Population, Housing and Employment

This impact discussion would likely include evaluation of the consistency of expected housing, population and employment in the Project area with ABAG projections and other projections of population and employment, and consistency of the housing, population, and employment characteristics of the Project with adopted City plans and policies, including policies related to affordable housing and local hiring. The analysis will also discuss displacement of existing residents and employee generating uses.

Cultural Resources

The Cultural Resources section of the EIR will be based on technical studies completed for the Candlestick Point Hunters Point Shipyard Phase 2 EIR and other previously conducted surveys and reports such as the India Basin Historic Survey completed by Kelley and VerPlanck. The archaeological resources impact analysis will summarize potentially significant resources within the Project area. The historic resource analysis will discuss potentially significant resources within the Project area as identified in the previously conducted surveys and reports and address potential impacts to the significance of these resources.

Transportation and Circulation

Potential transportation impacts on different transportation modes (automobiles, transit, bicycles, and pedestrians) will be evaluated based on the analysis completed for the proposed adjacent Candlestick Point – Hunters Point Shipyard Phase II Development Plan Project. Existing conditions and proposed future project element improvements will be included in the evaluation.

Noise

The EIR will include analysis of construction noise from both construction equipment/activities and trucks delivering construction supplies or hauling away debris. Construction noise levels will be projected at noise sensitive receptors for the type of equipment and estimated construction schedules. In

addition, noise levels for traffic associated with daily operation will be predicted for major corridors running through the site and vicinity.

Air Quality and Greenhouse Gas Emissions

The EIR air quality impact analysis will include assessments of construction activity, emissions from operational and mobile sources, local ambient carbon monoxide (CO) concentrations at sensitive land uses near major motor vehicle access routes and the potential for CO standard violations, potential adverse toxic air contaminant impacts, and changes in greenhouse gas emissions.

Wind

Potential wind impacts created by the development of multi-story structures and proposed open space amenities will be qualitatively evaluated using information on potential building height and massing. The potential for adverse wind effects on outdoor areas will be evaluated including both active and passive open space based on building orientation, massing, and exposure. Wind will be considered as it would affect both comfort and pedestrian safety.

Solar Access/Shadow

Shadow constraints will be identified in order to avoid or limit shadow effects on open space within the jurisdiction of the City's Recreation and Park Department. The analysis will discuss the proposed land uses and height and bulk regulations in the Project area that could affect existing parks, such as the India Basin Shoreline Park and new parks and open space proposed at Hunters Point Shipyard.

Public Services

The Public Services section of the EIR will be based on information in the Candlestick Point Hunters Point Shipyard Phase 2 EIR. The EIR analysis will include:

- A determination of additional police protection, fire protection or emergency medical services staff or equipment would be required to provide service to the Project.
- An estimate of additional public school enrollment that could be accommodated by the housing included in the Project as well as enrollment that could be associated with employment on the site.
- Assessment of whether new or expanded school facilities would be required to accommodate estimated new enrollment; if so, describe whether new or expanded facilities could have a significant environmental impact and identify mitigation measures to ameliorate potential impacts, if needed.
- Assessment of whether new or expanded library facilities would be required to respond to impacts on library services.

Utilities

It is anticipated that the majority of utility related infrastructure required to serve development in the Project area will be extended and/or constructed as individual development projects proceed in the future. The EIR will estimate service demands for each utility. The requirements for utilities and service systems will be compared with the capacity of the existing and planned systems in the Project area and vicinity.

The EIR will assess the ability of the existing facilities to meet the projected demand of the Project. The EIR will identify effects to these systems and the need for increased utility equipment and infrastructure.

Biological Resources

A reconnaissance-level biological resource assessment will be conducted of the Project area with an emphasis along the shoreline and serpentine soil areas to determine whether the site supports federally or state protected special status species or their habitat. The EIR will include an evaluation of potential impacts on sensitive and non-sensitive plant and wildlife resources in terms of habitat loss, habitat fragmentation, changes in species' presence and abundance, and plant and animal displacement.

Geology and Soils

The EIR analysis will consider the seismic and soil stability effects on new structures and their occupants. These include temporary soil/slope instability caused by grading; erosion potential and increased hazards produced by potential failure of foundation support; and strong seismic groundshaking. The analysis will identify and discuss design constraints associated with relevant building codes for structural design and review and seismic safety.

Hydrology and Water Quality

Construction and operational impacts to stormwater quality will be addressed, generally at a program-level.

Hazards and Hazardous Materials

The EIR analysis will be based on information presented in existing PG&E Hunters Point power plant decommissioning documents and available Phase 1 or Phase 2 documents. The impact analysis will address potential for hazardous materials in contaminated soil and groundwater, disturbance of serpentine soils and naturally occurring asbestos, disturbance of underground storage tanks, buildings containing hazardous materials such as asbestos or lead that have not been characterized, and on-site hazardous materials storage and transport. The impact analysis will also briefly consider cumulative effects, in as much as the effects related to the redevelopment of former contaminated sites are generally site-specific and do not combine with effects elsewhere.

Energy

The EIR will include discussion of the potential impacts of the Project on overall energy consumption. This includes direct energy consumption resulting from construction and operation of the Project as well as indirect consumption related to increased vehicle trips.