

A. INTRODUCTION

The New York State Environmental Quality Review Act (SEQRA) requires a lead agency to take a “hard look” at the potential environmental impacts of proposed actions and, to the maximum extent practicable, avoid or mitigate potentially significant adverse impacts on the environment, consistent with social, economic, and other essential considerations. An environmental impact statement (EIS) is a comprehensive document used to systematically consider environmental effects, evaluate reasonable alternatives, and identify and mitigate, to the maximum extent practicable, any potentially significant adverse environmental impacts. The EIS provides a means for the lead and involved agencies to consider environmental factors and choose among alternatives in their decision-making processes related to a proposed action.

B. SUPPLEMENTAL GENERIC ENVIRONMENTAL IMPACT STATEMENT (SGEIS)

A generic environmental impact statement (GEIS) is a broader, more general EIS that analyzes the impacts of a concept or overall plan rather than those of a specific project plan. A GEIS is useful when the details of a specific impact cannot be accurately identified, since no site-specific project has been proposed, but a broad set of further projects is likely to result from the agency’s actions. A GEIS follows the same format as an EIS for a more specific project, but its content is necessarily broader.

Subsequent discretionary actions under the program studied in a GEIS may require further review under New York City Environmental Quality Review (CEQR). According to 6 NYCRR Section 617.10, “GEISs and their findings should set forth specific conditions or criteria under which future actions will be undertaken or approved, including requirements for any subsequent SEQRA compliance.” Therefore, as with the 2011 FGEIS, the SGEIS, where appropriate, discusses possible conditions under which further environmental review would be required (e.g., changes in the mix of uses or increases in the size of the development program). Often, a GEIS is used as the foundation for the subsequent environmental review for a site-specific project, since it would have established the analysis framework. Therefore, the subsequent supplemental environmental review need only target the specific narrow impacts associated with the subsequent action. In some technical areas the changes examined for 2022 will make no significant difference to the conclusions of the 2011 FGEIS for 2030. For these technical areas—socioeconomics, community facilities, open space, natural resources, hazardous materials, infrastructure, solid waste and energy—detailed screening assessments were provided in the Positive Declaration and are summarized at the end of this chapter.

In particular, the reasons for preparing an SGEIS under the requirements of SEQRA and CEQR guidelines are that the zoning actions are now defined, there is more known about likely re-tenanting, and full development of the Park Master Plan is expected to be completed earlier than

was previously contemplated, and that these would require expanded ferry service. The document remains generic in that the program associated with North Island re-tenancing is not specifically proposed, and that the two South Island Development Zones are not yet specifically proposed, defined, or designed. Therefore, the studies contained in this SGEIS will necessarily be less detailed than if more specific details were available and will focus on identifying potential associated environmental concerns. To the extent required under CEQR/SEQRA, it is possible that further environmental review may be necessary when certain, as yet undefined components of the South Island Development Zones are considered.

METHODOLOGY

In the future without the Proposed Project (or the No Build condition), Governors Island is assumed to continue to operate as it does today. Visitation is dependent on certain factors that can be controlled, such as the ability to access the Island (number of operating days and hours, ferry capacity, and frequency). Public outreach and enhancements in recent years have made Governors Island a highly visited summer weekend destination, and at peak times, ferries already operate at capacity.

As described below, two analysis years are considered: 2022 and 2030.

2022 ANALYSIS YEAR

The 2022 analysis year considers the potential for impacts from the following Proposed Project components:

- Creation of the Special Governors Island District on the North Island.
- The reuse and re-tenancing of approximately 1.2 million square feet (sf) of space on the North Island along with the potential demolition and replacement of two non-historic building additions with new structures of the same floor area and similar bulk. In addition, a new structure would be built on the open area north of Building 110, immediately west of Soissons Landing (the “Soissons Concession Site”).
- The full development of the Park Master Plan for the entire Island.
- Ferry service seven days per week to support the uses in the re-tenanted buildings and the completed Park and Public Spaces.

Potential impacts for the 2022 analysis year are examined cumulatively by including the impacts identified for Phase 1 of the Park Master Plan.

2030 ANALYSIS YEAR

Similar to the 2011 FGEIS, this SGEIS considers the impacts of the South Island Development Zones based on a generic development program since there are no specific development plans or proposals for those areas. Their potential impacts are examined qualitatively or generally in less detail than those provided for development through 2022. Potential impacts are considered cumulatively by assessing the full development of Governors Island, including those project components that would be complete by the 2022 analysis year and the completion of the South Island Development Zones by 2030.

As in the 2011 FGEIS, total development would remain at 3 million sf. However, based on program and phasing refinements since the 2011 FGEIS, the anticipated program for the full development of the Island is somewhat different from that contemplated in the 2011 FGEIS.

Table 2-1 shows the existing re-tenanted space on the North Island and the anticipated development program for the North Island Redevelopment in 2022 and the South Island Development Zones by 2030 for both the University/Research Option and the Mixed-Use Option. Table 2-2 compares the 2011 FGEIS program with the SGEIS program for the University/Research Option and the Mixed-Use Option to illustrate how the programs have changed since the 2011 FGEIS.

Table 2-1
Total Governors Island Development (Existing and Proposed)—2030

Land Use	Existing Re-Tenanted Space (sf) ¹	University/Research Option			Mixed-Use Option		
		North Island Redevelopment (sf)	South Island Development Zones (sf)	Total (sf)	North Island Redevelopment (sf)	South Island Development Zones (sf)	Total (sf)
University							
Campus	0	422,000	0	422,000	0	0	0
Research	0	0	188,650	188,650	0	0	0
Academic	0	0	213,450	213,450	0	0	0
Housing—Faculty Housing ²	0	0	94,300	94,300	0	1,120,950	1,120,950
Housing—Dormitories ²	0	262,000	588,000	850,000	262,000	188,000	450,000
Conference Center/Hotel	0	256,250	243,750	500,000	256,250	93,750	350,000
Office	48,450	7,000	119,550	175,000	300,325	0	348,750
Service Retail/Restaurant ³ <i>(Not destination, accessory to Island)</i>	0	37,800	37,200	75,000	37,800	37,200	75,000
Cultural							
General <i>(Gallery, small museum, etc.)</i>	0	0	0	0	128,700	0	128,700
Artist Studio	47,700	57,000	0	104,700	57,000	0	104,700
Movie Theater	0	9,200	0	9,200	9,200	0	9,200
Public School ⁴	79,700	148,000	0	227,700	148,000	45,000	272,700
Maintenance, Support, Other	0	0	140,000	140,000	0	140,000	140,000
TOTAL	175,850	1,199,250	1,624,900	3,000,000	1,199,250	1,624,900	3,000,000

Notes:

1. The existing re-tenanted North Island uses are not assessed in the SGEIS analyses.
2. All academic housing: contemplated to be residential uses ancillary to educational uses on- and/or off-Island.
3. Includes 8,000 sf of redevelopment for the Soissons Concession Site.
4. In the University/Research Option, a public school for grades 6-12 would be provided. In the Mixed-Use Option, a 45,000-sf elementary school would be provided in addition to the 6–12 school.

Table 2-2
Comparison of Total Island Development: 2011 FGEIS and SGEIS

Uses	University/Research Option (sf)			Mixed-Use Option (sf)		
	2011 FGEIS	SGEIS	Difference	2011 FGEIS	SGEIS	Difference
University						
Campus	0	422,000	422,000	0	0	0
Research	400,000	188,650	-211,350	0	0	0
Academic	450,000	213,450	-236,550	0	0	0
Housing—Faculty Housing ¹ <i>(assumed as apartments, not dorms)</i>						
	200,000	94,300	-105,700	1,650,000	1,120,950	-529,050
Housing—Student Dorms ¹	850,000	850,000	0	450,000	450,000	0
Conference Center/Hotel	500,000	500,000	0	350,000	350,000	0
Office	175,000	175,000	0	60,000	348,750	288,750
Service Retail/Restaurant <i>(Not destination, accessory to other uses)</i>	75,000	75,000	0	75,000	75,000	0
Cultural						
<i>(Gallery, artist studios, movie theater)</i>	60,000	113,900	53,900	125,000	242,600	117,600
Public School	150,000	227,700	77,700	150,000	272,700	122,700
Maintenance, Support, Other	140,000	140,000	0	140,000	140,000	0
TOTAL	3,000,000	3,000,000	0	3,000,000	3,000,000	0

Notes:

- Total development includes existing re-tenanted space on the North Island.
¹ All academic housing: contemplated to be residential uses ancillary to educational uses on- and/or off-Island.

When the South Island Development Zones have been planned and designed, it is anticipated that any land use actions would be subject to CEQR.

REASONABLE WORST CASE DEVELOPMENT SCENARIO

The land uses identified for the North Island re-tenancing as well as the South Island Development Zones have different population characteristics. For example, university housing uses would generate on-site residents whereas office uses would not. Other uses, including the park and open spaces, would generate workers and visitors that would access the island from the off-site ferry locations. Each analysis in the SGEIS uses a “reasonable worst-case development scenario” that could result in the worst environmental effect for that technical area.

The analyses focus on identifying potential environmental concerns associated with the potential uses identified in Table 1-2 to the extent required under CEQR/SEQRA; further environmental review may be necessary for as yet undefined components of the Later Phases.

The analyses assume that in the future without the Proposed Project, no portion of the Proposed Project would be implemented and the Island would continue in its current use and configuration.

STUDY AREAS

In general, the study areas for the SGEIS analyses include the entire Island, including that portion of Governors Island owned by the National Park Service and not belonging to The Trust, and depending on the specific analysis, may also include the area within 400 feet of the ferry landing at Pier 6 in Brooklyn Bridge Park and the area within 400 feet of the Battery Maritime Building.

C. SCREENING ASSESSMENTS

As stated in the Determination of Significance issued by the Office of the Deputy Mayor for Economic Development (ODMED) on December 5, 2012 certain technical areas do not require further evaluation of potential environmental impacts, including: socioeconomic conditions; community facilities and services; open space; natural resources; hazardous materials; water and sewer infrastructure; solid waste and sanitation services; and energy.

As described above, in addition to the Phase 1 park and infrastructure improvements, the 2011 FGEIS analyzed, generically, the Later Phases, which included additional open space improvements, the re-tenancing of the North Island, and development in the South Island Development Zones. In the FGEIS, cumulative impacts were fully studied for the North Island re-tenancing, the full Park Master Plan, and the South Island Development Zones in the FGEIS. In some technical areas the changes to the development program for the currently Proposed Project will make no significant difference to the conclusions of the FGEIS for 2030. Detailed screening assessments are provided for these technical areas, below.

SOCIOECONOMIC CONDITIONS

The modifications to the 2030 development program would not alter the findings of the 2011 FGEIS with respect to socioeconomic conditions, as detailed below for the five socioeconomic areas of concern prescribed in the *CEQR Technical Manual*.

DIRECT RESIDENTIAL DISPLACEMENT

As with the development program analyzed in the 2011 FGEIS, the Proposed Project would not directly displace any residential units. Therefore, there would be no significant adverse impacts from the Proposed Project due to direct residential displacement.

DIRECT BUSINESS AND INSTITUTIONAL DISPLACEMENT

As with the development program analyzed in the 2011 FGEIS, the Proposed Project would not directly displace any of the existing commercial and institutional uses on the Island. Therefore, there would be no significant adverse impacts from the Proposed Project due to direct business and institutional displacement.

INDIRECT RESIDENTIAL DISPLACEMENT

Because the Island is not currently developed with residential uses, development would not have the potential to cause indirect residential displacement on the Island, under both the development program analyzed in the 2011 FGEIS and the Proposed Project. The Proposed Project would introduce less academic housing to the Island than the development program analyzed in the 2011 FGEIS. Thus, the Proposed Project would not alter the 2011 FGEIS conclusion that academic housing on the Island would not affect rents in existing off-Island residential areas since the Island is physically separated from other existing residential neighborhoods. Therefore, the Proposed Project would not result in any significant adverse impacts due to indirect residential displacement.

INDIRECT BUSINESS AND INSTITUTIONAL DISPLACEMENT

The 2011 FGEIS analyzed potential impacts associated with the introduction of commercial development and the users associated with that development and concluded that it would not substantially alter the existing economic activities on the Island and would not result in any significant adverse impacts due to indirect business and institutional displacement.

The currently Proposed Project would result in a slightly different mix of new residents, employees, students, and visitors on the Island compared to the 2011 FGEIS. However, as in the FGEIS, this new population would likely result in higher demand for the types of seasonal concessions accessory to the park and public space currently offered, and any increases in rent would be offset by additional revenues generated by the new population's demand for these seasonal uses. Therefore, there would be no significant adverse indirect impacts to On-Island businesses as a result of the Proposed Project.

With respect to institutional uses, the Lower Manhattan Cultural Council does not currently pay rent for their space; and it is expected that this lease arrangement with The Trust will continue in the future. Also, the Harbor School would not experience indirect displacement pressure because the New York City Department of Education signed a 40 year lease for their current space in 2008. Therefore, as with the development program analyzed in the 2011 FGEIS, there would be no significant adverse indirect impacts to On-Island institutions as a result of the Proposed Project.

Both the program analyzed in the 2011 FGEIS and the Proposed Project would result in an introduction of new residential and worker populations, resulting in increased foot traffic in the Off-Island Study Areas. Since there would be substantial foot traffic in these Off-Island Study Areas in the future without the Proposed Project, neither program would introduce a new economic activity to the Off-Island Study Areas, and nor would they result in indirect business

and institutional displacement impacts. Moreover, the Proposed Project would not substantially increase the new residential and worker population as compared with the 2011 FGEIS development program. Therefore, the Proposed Project would not have the potential to cause significant adverse impacts due to indirect business displacement.

ADVERSE EFFECTS ON SPECIFIC INDUSTRIES

As with the development program analyzed in the 2011 FGEIS, the Proposed Project would not result in direct displacement and is not expected to include any regulatory changes with the potential to adversely affect conditions within a specific industry.

COMMUNITY FACILITIES

The modifications to the 2030 development program would not alter the findings of the 2011 FGEIS with respect to public schools, child care centers, libraries, outpatient health care facilities, or police and fire protection services, as detailed below.

PUBLIC SCHOOLS

The 2011 FGEIS development program included a 1,200 seat public school for grades K–12, which was expected to accommodate all of the students generated by the development program analyzed in the 2011 FGEIS. Like the program analyzed in the 2011 FGEIS, the Proposed Project would include the development of sufficient school capacity to accommodate all of the public school students that could be introduced by faculty housing on the Island by 2030.

CHILD CARE CENTERS

As with the development program analyzed in the 2011 FGEIS, the Proposed Project would not result in any low-income and/or low- to moderate-income housing. Therefore, the Proposed Project would not be expected to introduce children eligible for publicly funded child care and the Proposed Project would not result in any significant adverse impacts to child care facilities.

LIBRARIES

The 2011 FGEIS concluded that there would not be a significant adverse impact on libraries. Since the space for dormitories and faculty housing under the currently Proposed Project would be less than that analyzed for the full development of the Island in the 2011 FGEIS, fewer Island “residents” would be generated. Therefore, the FGEIS conclusions with respect to public libraries would remain valid—the Proposed Project would not result in significant adverse impacts to public library services.

OUTPATIENT HEALTHCARE FACILITIES

As with the development program analyzed in the 2011 FGEIS, the Proposed Project would not affect the physical operations of, or access to and from, a hospital or public health clinic. The space for dormitory uses and faculty housing uses under the currently Proposed Project would be less than that analyzed for the full development of the Island in the 2011 FGEIS, and it is expected that the new residential, worker, and visitor population that would be introduced by the Proposed Project would continue to have access to the outpatient healthcare facilities in the study area. Overall, the Proposed Project would not result in any significant adverse impacts to publicly funded healthcare facilities.

POLICE AND FIRE PROTECTION SERVICES

As with the development program analyzed in the 2011 FGEIS, the Proposed Project would not directly affect the physical operations of, or access to and from, a precinct house. The residential, worker, and visitor population that would be introduced by the Proposed Project would result in additional demand for police protection services similar to the population that was analyzed for the full development of the Island in the 2011 FGEIS. The FGEIS concluded that because the full development of the Proposed Project may necessitate the commitment of New York City Police Department (NYPD) personnel, resources, or equipment to the Island, there would be the potential for a significant adverse impact related to police protection services, which would be further evaluated in future environmental review of the Later Phases–Island Redevelopment. The Proposed Project would not alter this conclusion, and, because the program for the South Island Development Zones has not been specifically proposed, defined, or designed, the potential impacts to police protection services will be further evaluated in the future environmental review of the South Island Development Zones. In any case, based on NYPD policy, NYPD would continue to adjust its allocation of personnel and resources as the need arises.

As with the development program analyzed in the 2011 FGEIS, the Proposed Project would not affect the physical operations of, or access to and from, a fire station house. However, the residential, worker, and visitor population that would be introduced by the Proposed Project would result in additional demand for fire protection and emergency medical services similar to the population that was analyzed for the full development of the Island in the 2011 FGEIS. The FGEIS concluded that because the full development of the Proposed Project may necessitate the commitment of Fire Department of the City of New York (FDNY) personnel, resources, or equipment to the Island, there would be the potential for a significant adverse impact related to fire protection and EMS services, which would be further evaluated in the future environmental review of the Later Phases–Island Redevelopment. The Proposed Project would not alter this conclusion, and, because the program for the South Island Development Zones has not been specifically proposed, defined, or designed, the potential impacts to fire protection services will be further evaluated in the future environmental review of the South Island Development Zones. In any case, the FDNY does not allocate resources based on proposed or potential development, but continually evaluates the need for changes in personnel, equipment, or locations of fire stations and makes adjustments as necessary.

OPEN SPACE

The modifications to the 2030 development program would not alter the findings of the 2011 FGEIS with respect to open space. Under the Proposed Project, the Park Master Plan for the Island would be the same as analyzed in the 2011 FGEIS.

DIRECT EFFECTS

The 2011 FGEIS identified the potential for significant adverse impacts as a result of the Later Phases–Island Redevelopment component of the Proposed Project, which would result in development that could directly affect the future open space through increased shadows or other conditions. The re-tenanting of the North Island would not have significant adverse direct impacts on open space, as this component of the Proposed Project would primarily result in reuse of existing buildings. As part of the re-tenanting, it is expected that two non-historic building additions may be demolished and potentially replaced with new structures of the same floor area and similar bulk, and that a new structure would be constructed on the open area north

of Building 110, immediately west of Soissons Landing. These minor changes would not have the potential to result in significant adverse direct open space impacts. The two potential replacements of non-historic structures are expected to be substantially similar in size and bulk to the existing structures, and thus would not result in any material change to shadows on the Island. With respect to the new structure north of Building 110, this new structure would be located away from most of the park and public spaces on the Island and any new shadows cast on nearby open space, such as the Great Promenade, would not affect the usefulness of that open space.

Consistent with the 2011 FGEIS, when the uses associated with the South Island Development Zones are specifically defined and designed, the potential for significant adverse impacts related to direct effects on open space would be further evaluated in future environmental reviews.

INDIRECT EFFECTS

The space for dormitory uses and faculty housing under the currently Proposed Project would be less than that analyzed for the full development of the Island in the 2011 FGEIS and the number of visitors would be unchanged. Therefore, the changes to the development program would not alter the finding of the FGEIS that the Proposed Project would not result in any significant adverse open space impacts due to indirect effects. In addition, the Proposed Project would also not be expected to create consistent open space demands on open spaces near the ferry landings, nor would it diminish the ability of these open spaces to serve their user populations.

Because the Proposed Project would not alter the Park Master Plan, it would provide the same wide range of active and passive facilities to serve the varying open space needs of the different user populations that would be introduced (residents, workers, commuter students, and visitors). Consistent with the development program analyzed in the 2011 FGEIS, new play areas and sports fields would provide active recreation space for residents and visitors of all ages, and new and improved passive open space areas would be developed to serve the passive recreation needs of the residential, worker, commuter student, and visitor populations.

NATURAL RESOURCES

The modifications to the 2030 development program would not alter the findings of the 2011 FGEIS with respect to natural resources. As analyzed in the 2011 FGEIS, the South Island Development Zones largely overlap with currently developed areas, and the location of these development zones would not change under the Proposed Project. Therefore, little existing open space habitat would be modified or lost by future construction activities within these areas or by construction activities to support the North Island re-tenancing. The Later Phases—Park and Public Spaces would result in beneficial effects on plants and wildlife on and around the Island, and these plans have not changed since the 2011 FGEIS.

As analyzed in the 2011 FGEIS, portions of the park and open space elements to be developed in the South Island by 2030 would be located within the current 100-year floodplain. Fill material would be added to some of these areas in order to raise the elevation above the projected future 100-year flood elevation, while other areas would be designed to tolerate some flood inundation. The design of any new buildings within the South Island Development Zones would have to be consistent with the New York City Building Code requirements for construction within the 100-year floodplain.

With the reduction in impervious cover and implementation of erosion and sediment control measures and the stormwater management measures that would be specified in the Stormwater

Pollution Prevention Plans (SWPPP), stormwater discharged during construction of the Proposed Project would not result in significant adverse impacts to littoral zone tidal wetlands, or to water quality, or aquatic biota of the Upper Bay.

Thus, as with the development program analyzed in the 2011 FGEIS, the Proposed Project would not have the potential to result in any significant adverse impacts to existing terrestrial plant and wildlife communities, floodplains, wetlands, water quality, or aquatic biota in the Upper New York Bay.

HAZARDOUS MATERIALS

The modifications to the 2030 development program would not alter the findings of the 2011 FGEIS with respect to hazardous materials. The 2011 FGEIS and prior environmental studies found that, with certain measures undertaken prior to and during construction, the Proposed Project would prevent hazardous materials impacts. The following measures would be undertaken prior to and during construction of the Proposed Project:

- All subsurface soil disturbance would be performed in accordance with existing procedures relating to potential unexploded ordnance, including the use of ground-penetrating radar prior to conducting excavation.
- During all dewatering required during subsurface work, water would be discharged in accordance with NYSDEC State Pollutant Discharge Elimination System (SPDES) permitting requirements. If necessary, the water would be pretreated prior to discharge.
- All excavated soil and fill materials requiring off-site disposal would be handled and disposed of in accordance with applicable regulatory requirements. Should contaminated soil and/or petroleum tanks be encountered, applicable regulatory requirements (e.g., those relating to spill reporting and tank registration) would be followed to address removal of the tanks and any associated soil or groundwater contamination.
- Any tanks that would be disturbed by excavation activities would be closed and removed, along with any contaminated soil, in accordance with applicable requirements including NYSDEC spill reporting requirements. If historical tanks are discovered, they would be properly registered, if required, with NYSDEC and/or the New York City Fire Department. The NYSDEC Petroleum Bulk Storage record and Spill Prevention, Countermeasure and Control Plan (SPCC) would be kept updated with the status of the tanks.
- All such disturbance would be performed in accordance with a NYCDEP-approved Remedial Action Plan (RAP) and Construction Health and Safety Plan (CHASP), the scope of which would be based on the findings of the existing studies. The RAP would provide the appropriate clean fill importation criteria and criteria for allowable reuse of excavated site soils (whether in the uppermost layer of landscaped areas or elsewhere), handling, stockpiling, testing, transportation, and disposal of excavated materials, including any unexpectedly encountered contaminated soil and petroleum storage tanks, in accordance with applicable regulatory requirements. The CHASP would ensure that subsurface disturbance is performed in a manner protective of workers, visitors to the Island, and the environment.

With these measures, the Proposed Project would not result in any significant adverse impacts related to hazardous materials.

No change to these measures is proposed as part of the Proposed Project, and therefore, as with the development program analyzed in the 2011 FEGIS, the Proposed Project would not result in any significant adverse impacts related to hazardous materials.

WATER AND SEWER INFRASTRUCTURE

The modifications to the 2030 development program would not alter the findings of the 2011 FGEIS with respect to water and sewer infrastructure. As with the development program analyzed in the 2011 FGEIS, the Proposed Project would result in increased demand on the City's water supply and wastewater conveyance and treatment infrastructure, but this incremental demand would not result in any significant adverse impacts.

The changes to the development program under the Proposed Project would not materially affect the water demand for the full development of the Proposed Project as analyzed in the FGEIS. The Proposed Project would include either one or two new 12-inch water mains, which would provide adequate water supply. Therefore, it is expected that there would be adequate water service for the Proposed Project and there would be no significant adverse impacts on the City's water supply.

The Proposed Project would likewise not materially affect the sewage generation for the full development of the Proposed Project as analyzed in the FGEIS. Therefore, as with the program analyzed in the 2011 FGEIS, the incremental sanitary sewage generation associated with the Proposed Project would not be expected to create a significant adverse impact on the City's sanitary sewage treatment system.

The Proposed Project would not alter the findings of the 2011 FGEIS with regard to stormwater runoff. As noted in the 2011 FGEIS, when the specific uses for the South Island Development Zones are identified and designed, it is anticipated that additional environmental review will be required.

SOLID WASTE AND SANITATION SERVICES

The modifications to the 2030 development program would not alter the findings of the 2011 FGEIS with respect to solid waste. The changes to the development program under the Proposed Project would not materially affect the solid waste generation for the full development of the Proposed Project as analyzed in the FGEIS. Therefore, the Proposed Project would not result in any significant adverse impacts to solid waste and sanitation services.

ENERGY

The modifications to the 2030 development program would not alter the findings of the 2011 FGEIS with respect to energy. As with the development program analyzed in the 2011 FGEIS, the Proposed Project would not have the potential for significant adverse impacts on energy because the Proposed Project would not significantly affect the transmission or generation of energy. *