



DEPARTMENT OF CITY PLANNING
CITY OF NEW YORK

ENVIRONMENTAL ASSESSMENT AND REVIEW DIVISION

Carl Weisbrod, *Director*
Department of City Planning

June 19, 2015

**NOTICE OF COMPLETION OF
THE FINAL ENVIRONMENTAL IMPACT STATEMENT**
Staten Island Mall Enlargement

Project Identification

CEQR No. 14DCP136R
ULURP Nos. N150271ZAR, N150275ZCR,
N150274ZCR, N150273ZAR, and
N150272ZAR

SEQRA Classification: Type I

Lead Agency

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Pursuant to City Environmental Quality Review (CEQR), Mayoral Executive Order No. 91 of 1977, CEQR Rules of Procedure of 1991 and the regulations of Article 8 of the State Environmental Conservation Law, State Environmental Quality Review Act (SEQRA) as found in 6 NYCRR Part 617, a Final Environmental Impact Statement (FEIS) has been prepared for the proposal described below. The proposal involves actions by the City Planning Commission and Council of the City of New York pursuant to Uniform Land Use Review Procedures (ULURP). Copies of the FEIS are available for public inspection at the office of the undersigned. A public hearing on the DEIS was held on May 6, 2015. Written comments on the DEIS were requested and accepted by the Lead Agency until May 18, 2015.

A. INTRODUCTION

GGP Staten Island Mall, LLC, Macy's Retail Holdings, Inc. (Macy's) and JCPenney Corporation, Inc. (collectively, the Applicants) propose to enlarge an existing commercial center known as the Staten Island Mall (the Mall), located at 2655 Richmond Avenue (Block 2400, Lots 7, 118, 180, 210, 220, and 500) in the Heartland Village neighborhood of Staten Island Community District 2. The 84.95-acre project site for the proposed project (Staten Island Block 2400, Lots 7, 118, 180, 210, 220, and 500) is located in a C4-1 zoning district and is bounded by Richmond Hill Road, Marsh Avenue, Platinum Avenue, and Richmond Avenue.

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The proposed actions include zoning authorizations pursuant to Section 36-023 of the New York City Zoning Resolution (ZR) for a group parking facility accessory to a commercial enlargement on a zoning lot in excess of 4 acres in a C4-1 zoning district and for a reduction of the parking requirement of ZR Section 36-21, and a certification of cross-access easements pursuant to ZR Sections 36-592 and 36-596(a). The proposed actions would facilitate the development of approximately 426,576 gross square feet (gsf) of new uses at the project site, including 298,711 gsf of local and destination retail uses (Use Group 6 or 10, depending on the retail use and size of establishment) and 54,488 gsf of Use Group 8 cinema uses. The additional space is anticipated to be occupied by: a supermarket (Use Group 6); cinema (Use Group 8); restaurant space (Use Group 6); food court (Use Group 6); enlargement of the existing Macy's department store (Use Group 10); other non-department store retail uses (Use Group 6 or 10, depending on the size and type of establishment); and mall common area.

In conjunction with the retail enlargement, the proposed project includes the development of a new parking structure, as well as exterior landscape improvements. As described in more detail below, the overall number of parking spaces provided on the project site would decrease from 5,844 spaces to 5,477 spaces.¹ The proposed actions would facilitate the Applicants' proposal through authorizing the site plan, which includes the size and location of the proposed enlargement, and the reconfiguration and number of parking spaces. It is anticipated that the proposed project would be completed by 2017. However, there is the possibility that Macy's would elect to postpone commencement of construction of its proposed 75,000-gsf enlargement, in which case the Macy's enlargement and a portion of the proposed structured parking garage would not be expected to be complete until 2019 (the "2019 Full-Build Scenario").² As detailed in Section C, "Build Year," the EIS evaluates the most conservative build scenario in determining the potential for significant adverse environmental impacts.

B. PROJECT DESCRIPTION

PROPOSED ACTIONS

The Applicants are seeking zoning authorizations pursuant to the ZR Section 36-023 for:

- A reduction by up to 47.5 percent of the ZR Section 36-21 parking requirement;
- Approval of the layout of a group parking facility accessory to a commercial development; and
- Approval to modify/waive the parking maneuverability and landscaping provisions of ZR Sections 36-58 and/or 37-90.

In addition, the Applicants are seeking cross-access easement certifications pursuant to: ZR Section 36-592 to certify that cross-access connections have been provided (for locations where they are required); and pursuant to ZR Section 36-596(a) that cross-access connections are not required (for locations where the presence of existing buildings preclude their provision). These certifications are ministerial actions and not subject to environmental review.

Since the tax lots that comprise the proposed project were the subject of variances granted by the Board of Standards and Appeals (BSA) in 1971 and 1991, the Applicants anticipate that they will apply to BSA to modify, via Special Order Calendar or by letter, the plans accompanying those previously-granted variance(s).

¹ The numbers of existing and proposed parking spaces (5,844 and 5,477, respectively) do not include 64 spaces that straddle the project site and adjacent Sears zoning lot, as described below.

² Under the 2019 Full-Build Scenario, the project site would contain 5,235 parking spaces by 2017 and 5,477 spaces upon completion of the Macy's enlargement by 2019.

RESTRICTIVE DECLARATION

In connection with the proposed project, a Restrictive Declaration would be recorded at the time of final approval of all land-use related actions required to authorize the proposed Staten Island Mall Enlargement. The Restrictive Declaration would provide for the implementation of the mitigation measures at the intersection of Marsh Avenue and Staten Island Mall East Driveway and at Platinum Avenue at Staten Island Mall Drive. The Restrictive Declaration would require the Applicants, if so requested by the New York City Department of Transportation (NYCDOT), to install at the Applicants' expense a new traffic signal at the intersection of Marsh Avenue and Staten Island Mall East Driveway; and to install at the Applicants' expense a new left turn phase on the existing traffic signal at Platinum Avenue at Staten Island Mall Drive.

(E) DESIGNATION

The proposed project would assign (E) Designation (E-361) to the project site to avoid significant adverse hazardous materials impacts. An (E) designation is a mechanism that ensures no significant adverse impacts would result from a proposed project because of procedures that would be undertaken as part of the development of the project site.

DESCRIPTION OF THE PROJECT SITE

The project site is a 3,700,605-square-foot area generally bounded by Richmond Hill Road, Marsh Avenue, Platinum Avenue, and Richmond Avenue. The project site is located within a C4-1 zoning district, and contains approximately 1,228,814 gsf of retail uses and 5,844 parking spaces. The existing retail uses on the project site are Use Group 6 and Use Group 10. The worker population on the project site is approximately 2,750.

The project site for the proposed project does not include the zoning lot containing Sears or its adjacent 1,018-space parking area. Together with the Sears portion, the total Staten Island Mall site contains approximately 1,416,585 gsf of retail uses and 6,926 parking spaces.³

The Mall is a regional shopping center consisting of retail stores arranged with three anchor department stores on the north (Macy's), south (Sears), and east sides (JCPenney) of the Mall. The Mall is currently comprised of three zoning lots:

- The Macy's zoning lot (tax lot 118 and 500), which includes the Macy's department store, Macy's furniture store, and adjacent parking fields;
- The Mall/JCPenney zoning lot (tax lots 7, 180, 210, 220), which includes the retail stores comprising the mall itself, the JCPenney department store, and their adjacent parking fields; and
- The Sears zoning lot (tax lot 375), which includes the Sears department store and its adjacent parking field.

The Macy's zoning lot (tax lot 118 and 500) and the Mall/JCPenney zoning lot (tax lots 7, 180, 210, and 220) are anticipated to be merged into a single zoning lot and comprise the project site for the proposed project. This zoning lot merger would facilitate the Applicants' request for authorizations to approve a single site plan with a reduction in the combined parking requirement for the Macy's and Mall/JCPenney zoning lots. The Sears zoning lot (tax lot 375), which is not under the control of the Applicants, is not subject to the proposed actions and would not be able to enlarge or change its parking layout without other discretionary approvals; accordingly, it is not included as part of the project site.

³ Approximately 7,946 gsf of the proposed enlargement would involve converting existing loading docks, currently not calculated as parking in the BSA documents, to non-department store retail. The 7,946 gsf is noted as an addition in **Table S-1**.

DESCRIPTION OF THE PROPOSED PROJECT

RETAIL PROGRAM

Approval of the proposed actions would facilitate the development of an approximately 426,576-gsf enlargement of the Mall on areas currently used for accessory parking.⁴ Uses within the enlarged areas are anticipated to include: 88,007 gsf of non-department store retail; 41,208 gsf of department store retail; 33,665 gsf of restaurants; 10,831 gsf of new food court; a 50,000-gsf supermarket; a 54,488-gsf cinema; a 75,000-gsf enlargement of the existing Macy’s department store; and 73,377 gsf of common, service and receiving areas. **Table S-1** presents the size of each retail use component of the development program.

**Table S-1
 Proposed Development Program**

Use	ZR Use Group ¹	Floor Area (GSF)
Non-Department Store Retail	6	80,061
Department Store Retail	10	41,208
Restaurant	6	33,665
Food Court	6	10,831
Macy’s Enlargement	10	75,000
Conversion of Existing Loading Docks to Retail	6	7,946
Common, Service, and Receiving Areas	6/10	73,377
Supermarket	6	50,000
Cinema	8	54,488
Total:		426,576
Notes: ¹ Retail establishments could fall into Use Groups 6 or 10; the most common use group is indicated.		
Sources: S9 Architects and GGP Staten Island Mall LLC		

Use Group 6 includes a wide variety of local retail stores and personal service establishments. Examples of such uses include gift shops, toy stores, candy stores, clothing stores of 10,000 sf or less, furniture stores of 10,000 sf or less, and eating and drinking establishments with a capacity of 200 patrons or fewer and supermarkets. Use Group 8 primarily includes amusement uses such as cinemas and bowling alleys, and service establishments, such as automobile driving schools and television repair shops. Use Group 10 includes large retail uses intended to serve a wide area, including department stores, wholesale stores, and large clothing or furniture stores.

PARKING

As noted above, the project site is located within a C4-1 zoning district. According to Section 36-21 of the Zoning Resolution, C4-1 zoning districts require one accessory parking space for every 150 sf of floor area for retail/service uses. For other uses, one parking space must be provided for every 100 sf of floor area for supermarket uses and for every 4 cinema seats. For the existing development on the project site and the proposed development, which does not include the Sears zoning lot, a total of 10,438 parking spaces would be

⁴ Approximately 7,946 gsf of the proposed enlargement would involve converting existing loading docks, currently not calculated as parking in the BSA documents, to non-department store retail. The 7,946 gsf is noted as an addition in **Table S-1**.

required at these ratios.⁵

To accommodate the development of the proposed project, approximately 1,780 existing surface parking spaces on the project site would be displaced. These spaces would be partially replaced by a new structured garage with a capacity of 1,413 parking spaces. Thus, the proposed project would result in a net decrease of 367 parking spaces, as the overall number of parking spaces provided on the project site would decrease from 5,844 to 5,477. These 5,477 provided spaces would be approximately 47.5 percent fewer than the 10,438 spaces required by Section 36-21; thus a 47.5 percent reduction in required spaces is requested by the Applicants.

LANDSCAPE PLAN

The proposed project would include landscape improvements throughout the project's site surface parking areas, including planting approximately 427 new trees. These trees would be planted in areas including the perimeter of the proposed parking structure, as well as within and along the edges of various parking areas. The proposed project would also enhance the main entry point of the Staten Island Mall with new trees and the creation of a multi-use plaza at the Mall's entrance. The plaza would be designed with appropriate paving, landscaping, and lighting so that it may function as a pedestrian plaza to be used for public events including holiday fairs, greenmarkets, and cultural events.

C. BUILD YEAR

Assuming commencement of construction in December 2015, and an estimated 22-month, single-phase construction period for the proposed enlargement, the proposed project is expected to be complete and occupied by 2017. Under the 2019 Full-Build Scenario, Macy's would postpone commencement of construction of its proposed 75,000-gsf enlargement until 2018 or 2019, in which case the Macy's enlargement and a portion of the structured parking garage would not be complete until 2019 (assuming an approximately 10-month construction period subsequent to the 22-month period described above). Although the Applicants would not be obligated to retain required parking spaces during the construction period(s), spaces would be retained or replaced on a temporary basis, to the extent practicable.

For the purposes of analyzing the Reasonable Worst-Case Development Scenario (RWCDS), for a majority of analyses a future full build year of 2017 has been examined to assess the potential impacts of the proposed project; the RWCDS for these analyses assumes that the entire proposed project—including the Macy's enlargement—is complete and occupied by 2017. Each analysis that assumes a 2017 full-build condition also includes an assessment that considers whether the 2019 Full-Build Scenario (i.e., a two-year lag in the completion of the Macy's enlargement and a portion of the structured parking) could result in potential impacts that differ from those identified under the RWCDS.

The analyses of transportation (including traffic, parking, bus transit, and vehicular and pedestrian safety), air quality, noise, and greenhouse gas emissions evaluate the 2019 Full-Build Scenario, because additional background growth between 2017 and 2019 could contribute to additional potential significant adverse impacts not identified when analyzing a 2017 full-build condition. Where significant adverse transportation impacts have been identified, the Applicants would commit to implementing any identified mitigation measures upon opening of the majority of the proposed enlargement (i.e., by 2017). Analyses that assume a 2019 Full Build condition also consider whether a 2017 full-build condition could result in significant adverse impacts greater than those identified in the 2019 analysis.

⁵ In 2002 BSA approved a reduction in the number of required spaces on the Macy's portion of the project site, to bring the total number of required spaces on the Macy's and the mall zoning lots (i.e., the current project site) to 5,901 spaces. The project site currently has 5,844 surface parking spaces (or 5,908 spaces including the 64 spaces that straddle the project site and the Sears zoning lot). Since this application seeks a reduction in the underlying zoning requirements for parking, this 2002 BSA approval would no longer be necessary. For purposes of the parking requirement calculation in this DEIS, no deductions from GSF to ZSF were assumed and common/service/receiving areas were treated as general retail space.

D. PURPOSE AND NEED OF THE PROPOSED ACTIONS

The proposed actions are necessary to facilitate new commercial development on the project site. Without the proposed approval of parking facility layout and relief from requirements regarding the provision of off-street accessory parking, no new development could occur on the project site, even though development on the site is below the maximum allowable floor area ratio (FAR). The built FAR of the project site would increase from approximately 0.32 FAR to 0.44 FAR, but would still be well below the maximum allowable FAR of 1.0. While additional structured parking could be provided, the Applicants do not believe that the cost to provide the additional amount of structure parking would be economically feasible.

It is the Applicant's goal to expand retail uses on the project site, which the Applicants believe would fulfill the surrounding community's demand for additional commercial goods and services, and would promote the retention of sales and economic activity within Staten Island. Also, the proposed project would occur on underutilized land within an existing concentration of retail uses. Currently, despite the commercial success of the Mall, the surface parking lots surrounding the mall are underutilized. Surveys of parking utilization found that utilization of the existing parking lots was typically 50 percent, and never exceeded 60 percent.

Without the proposed zoning authorizations to approve the proposed site plan and reduce the amount of parking required on the site, the proposed project could not be built.

E. FRAMEWORK FOR ANALYSIS

The 2014 *City Environmental Quality Review (CEQR) Technical Manual* serves as the general guide on the methodologies and impact criteria for evaluating the proposed project's potential effects on the various environmental areas of analysis. As noted above, the proposed project is expected to be complete and occupied by 2017, or by 2019 under the 2019 Full-Build Scenario. Because the proposed project is anticipated to be fully operational in 2017 or 2019, its environmental setting is not the current environment, but the future environment. Therefore, the technical analyses and consideration of alternatives assess current conditions and forecast these conditions to 2017 or 2019 for the purposes of determining potential impacts. Specifically, the EIS provides a description of "Existing Conditions" and forecasts these conditions to the future 2017 or 2019 analysis year without and with the proposed project ("No Action" and "With Action" conditions, respectively). As noted above, each analysis that assumes a 2017 full-build condition also includes an assessment that considers whether the 2019 Full-Build Scenario (i.e., a two-year lag in the completion of the Macy's enlargement and a portion of the structured parking) could result in potential impacts that differ from those identified under the 2017 full-build analysis. Conversely, analyses that assume a 2019 full-build condition consider whether a 2017 full-build condition could result in potential significant adverse impacts greater than those identified in the 2019 analysis.

To forecast the No Action condition, information on known land-use proposals are incorporated. The differences between No Action and With Action conditions are assessed to determine whether such differences are adverse and/or significant; and any significant adverse environmental impacts are disclosed. The EIS also identifies and analyzes appropriate mitigation for any identified significant adverse environmental impacts. Based on the preliminary screening assessments provided in the Environmental Assessment Statement, the following environmental areas do not require analysis for the proposed project in this EIS: community facilities; shadows; historic and cultural resources; and energy.

The RWCDs for the purpose of analyzing the potential environmental impacts of the proposed project is described below, including the No Action scenario and the With Action scenario.

NO ACTION SCENARIO

Absent the proposed actions, no new development is anticipated to occur on the project site. Any such development or enlargement, including changes to the parking site plan, would require authorizations pursuant to ZR Section 36-023, which is a discretionary action and subject to environmental review, to assure that the layout of parking space is arranged and located in relation to the uses on the site so as to provide adequate ingress, egress, and circulation with respect to the abutting streets. In the No Action scenario, conditions on the project site are expected to remain unchanged from existing conditions.

WITH ACTION SCENARIO

The proposed actions would facilitate the Applicants' proposal through authorizing the site plan, which would set the location and size of the proposed enlargement, and the reconfiguration and number of parking spaces. The proposed enlargement will be limited to the building footprints and floor area shown on the authorized site plan and the layout and number of parking spaces. Deviation from the site plan by reconfiguring the layout of the parking spaces or adding or subtracting the number of spaces provided, or shifting the building footprints or floor area, would require the Applicants to seek an additional authorization pursuant to ZR Section 36-023. However, the site plan does not set the size and location of the proposed Use Groups 6, 8, and 10 and allows flexibility for where the uses are located within the proposed footprints of the enlargement.

In order to provide a conservative environmental review, a RWCDs for the With-Action scenario was developed based on the Applicants' current intended development program and typical retail uses in similar developments that generate a high number of vehicle trips. The specific retail types under the RWCDs include 33,665 gsf of restaurant space (UG-6), 50,000 gsf of supermarket space (UG-6), 75,000 gsf of enlargement space for the Macy's (UG-10), and 54,488 gsf of cinema space (UG-8). The Applicants have identified a demand for a supermarket and a cinema on the site, as well as additional shopping center uses. The Applicants believe that the 50,000-gsf supermarket and 2,500-seat cinema are appropriately sized for local market conditions. Inclusion of the supermarket would be conservative from an environmental analysis standpoint, as it would generate a relatively high number of vehicle trips. The proposed cinema would also generate a relatively high number of vehicles and the Applicants believe it would provide a complimentary use to the shopping center. The proposed development is broken down by ZR Use Group and GSF in **Table S-1** and shown on the proposed site plan. Overall, the proposed mix of uses provides a reasonable, worst case, and conservative basis for environmental analysis.

With the 426,576 gsf of new uses that are expected to be added as a result of the proposed actions, the project site would contain approximately 1,655,390 gsf of retail uses. The worker population of the project site would increase by an estimated 943 in the With Action scenario, to an estimated 3,693 employees (see **Table S-2**). As noted above under "Description of the Proposed Project," the proposed project would result in a net decrease of 367 parking spaces, and in order to facilitate the proposed project, the Applicants are seeking zoning authorizations to reduce the required parking on the project site by 47.5 percent.

The proposed project would include landscape improvements throughout the project's site surface parking areas, including planting new trees. These trees would be planted in areas including the perimeter of the proposed parking structure, as well as within and along the edges of various parking areas.

**Table S-2
 Summary of Reasonable Worst Case Development Scenario**

Block/Lot	Project Info	Existing Condition	No-Action Condition	With-Action Condition	Increment
2400/ 7, 118, 180, 210, & 220	Zoning Lot Size (SF)	3,700,605	3,700,605	3,700,605	0
	GSF Above Grade	1,228,814	1,228,814	1,655,390	426,576
	GSF Below Grade	0	0	0	0
	Commercial GSF	1,228,814	1,228,814	1,655,390	426,576
	Uses	Retail (UG 6, 10)	Retail (UG 6, 10)	Retail (UG 6, 8, 10)	UG 6, 8, 10
	Community Fac. GSF	0	0	0	0
	Residential GSF	0	0	0	0
	Manufacturing GSF	0	0	0	0
	Dwelling Units	0	0	0	0
	Affordable Dwelling Units	0	0	0	0
	Accessory Parking Spaces ¹	5,844	5,844	5,477	-367
	Building Height	Up to 56'	Up to 56'	Up to 60'	Up to 4'
	Workers ²	±2,750	±2,750	±3,693	±943
	TOTAL GSF	1,228,814	1,228,814	1,655,390	426,576

Notes: ¹The numbers of parking spaces do not include 64 spaces that straddle the project site and the Sears zoning lot.
²Assumptions use the following standard industry employment densities which are frequently utilized in environmental review documents: non-department store (in-line) retail = 1 worker/400 gsf; large-format and department store retail = 1 worker/500 gsf; restaurant = 1 worker/200 gsf; food court = 1 worker/150 gsf; supermarket = 1 worker/250 gsf; cinema employment estimated (50 employees) based on size, hours, and comparable theaters.

F. PROBABLE IMPACTS OF THE PROPOSED PROJECT

LAND USE, ZONING, AND PUBLIC POLICY

The analysis finds that the proposed project would not result in any significant adverse impacts to land use, zoning, and public policy.

The proposed actions would facilitate the proposed development of an approximately 426,576-gsf enlargement of the Mall on areas currently used for accessory parking, as well as a new structured parking garage and landscaping improvements throughout the project site. The new uses introduced by the proposed project would be consistent with existing uses on the project site. While the proposed project would result in a cinema (Use Group 8), which is a use not present on the project site, this use would be compatible with other uses and would not result in any land use conflicts. The addition of a structured parking garage is likely to be supportive of other uses on the project site, as it would provide convenient parking for Mall users. The replacement of certain underutilized parking areas with a structured parking garage and active commercial uses would not be considered an adverse land use change based on the parking-related transportation analysis. The proposed project would not alter the land use mix of the study area—which would continue to be characterized by a concentration of regional commercial uses—and the portions of the study area containing low- and medium-density residential communities would not be affected by the proposed project.

In the Future with the Proposed Project, 5,477 parking spaces would be provided on the project site, which represents a 47.5 percent reduction compared to the 10,438 spaces that would be required by zoning. Therefore, a 47.5 percent reduction in required spaces is necessary in order to facilitate the proposed project. As noted above, the surface parking lots surrounding the mall are currently underutilized, despite the commercial success of the Mall. The proposed supply of parking at the Mall would be adequate to fulfill future needs with the proposed project. The proposed actions would apply only to the project site and would have no effect on zoning in the surrounding area. In addition, the proposed project would be consistent with the relevant policies of the City's WRP, as it would result in commercial development in an appropriate area, and would incorporate measures to avoid impacts related to hazardous materials. Therefore, the proposed project would not result in any significant adverse impacts to land use, zoning, and public policy.

SOCIOECONOMIC CONDITIONS

The analysis finds that the proposed project would not result in any significant adverse impacts with respect to the socioeconomic areas of concern prescribed in the *CEQR Technical Manual*.

DIRECT RESIDENTIAL DISPLACEMENT

A screening-level assessment finds that the proposed project would not result in significant adverse impacts due to direct residential displacement. The project site does not contain any residential uses. Therefore, the proposed project would not directly displace any residents.

DIRECT BUSINESS DISPLACEMENT

A screening-level assessment finds that the proposed project would not result in significant adverse impacts due to direct business displacement. The proposed project would not result in the direct displacement of any businesses or employees.

INDIRECT RESIDENTIAL DISPLACEMENT

A screening-level assessment finds that the proposed project would not result in significant adverse impacts due to indirect residential displacement. The proposed project would not include any residential development, and therefore falls below the *CEQR Technical Manual's* 200-unit threshold warranting assessment.

INDIRECT BUSINESS DISPLACEMENT DUE TO INCREASED RENTS

A preliminary assessment finds that the proposed project would not result in significant adverse socioeconomic impacts as a result of indirect business displacement due to increased rents. While the proposed project would add a substantial amount of retail to the project site, this retail would support the existing customers at the Mall. The ½-mile study area already has a well-established retail market anchored by the existing Mall, and therefore the proposed project would not be introducing new economic activities that would alter existing economic patterns. The retail uses added by the proposed project would generate additional foot traffic within the Mall and additional vehicle traffic to retail nearby the Mall, and existing businesses could be expected to capitalize on the increased customer base. The new cinema would add a new, complementary entertainment use that would be expected to increase the customer base within and surrounding the Mall.

INDIRECT BUSINESS DISPLACEMENT DUE TO RETAIL MARKET SATURATION

A preliminary assessment finds that the proposed project would not result in significant adverse socioeconomic impacts as a result of indirect business displacement due to retail market saturation. Compared to conditions in the future without the proposed project, the 298,711 gsf of local and destination retail introduced by the proposed project would increase capture rates in the Primary Trade Area in the Shoppers' Goods (including Department Stores), Grocery Stores, and Eating and Drinking Establishments retail categories. However, these capture rates would remain below 100 percent. In addition, the 54,488-gsf cinema introduced by the proposed project would not be expected to saturate the market for cinemas in the Primary Trade Area. It is not expected that the proposed project would capture retail sales in any of these categories of good to the extent that the market for such goods would be saturated.

ADVERSE EFFECTS ON SPECIFIC INDUSTRIES

A preliminary assessment finds that the proposed project would not result in any adverse effects on specific industries. As the proposed project would not result in significant indirect business displacement due to increased rents or retail market saturation, and would not substantially affect a specific industry or category of business, the proposed project would not affect the economic viability or substantially reduce employment in any industry or category of business.

OPEN SPACE

The proposed project would not directly affect any existing open space resources. With regard to indirect effects, it is expected that workers that would be introduced by the proposed project would primarily utilize Mall common areas and outdoor landscaped seating areas to meet their open space needs. The ¼-mile study area surrounding the project site does not contain any publicly-accessible open space resources that could be utilized by Mall workers. However, the Mall itself currently includes landscaped areas with seating that provide passive recreational opportunities, and the proposed project would include landscaped areas with seating as well as a multi-use plaza. These on-site resources would provide workers in the study area with adequate passive recreational opportunities based on the New York City Department of City Planning (DCP) guideline of 0.15 acres per 1,000 workers. Due to the availability of Mall common areas, landscaped areas with seating, the new worker population introduced by the proposed project would not be expected to overburden any existing open space resources. Overall, the proposed project would not result in any significant adverse open space impacts.

URBAN DESIGN AND VISUAL RESOURCES

The preliminary analysis concluded that the proposed project would have no significant adverse impacts on urban design or visual resources, or the pedestrian's experience of these characteristics of the built and natural environment.

NATURAL RESOURCES

The proposed project would not result in any significant adverse impacts to natural resources. The proposed project would include enlarging an existing commercial center, construction of a new parking structure, and improvements within existing parking lots that presently contain minimal natural resources other than small areas of manicured lawn with trees, ruderal vegetation, and disturbance-tolerant wildlife species that are ubiquitous in urban areas. With the implementation of stormwater source control best management practices (BMPs) to reduce stormwater runoff volumes and rate at which stormwater is discharged to the city storm sewers, the discharge of stormwater to the city storm sewer with the proposed project would not adversely affect National Wetland Inventory (NWI)-mapped wetlands within Fresh Kills Park in the vicinity of the stormwater outfalls discharging runoff from the proposed project.

HAZARDOUS MATERIALS

With the incorporation of the measures described below, the proposed project would not result in significant adverse impacts with respect to hazardous materials. Previous studies conducted for the project site identified limited potential for subsurface contamination associated with: historical on-site airport and agricultural uses; on- and off-site petroleum storage; an auto service center in the adjacent Sears store; and dry cleaners and the Fresh Kills landfill (all of which are located in anticipated cross-gradient or down-gradient groundwater flow directions). To minimize the potential for hazardous materials impacts during or following construction, an (E) Designation for hazardous materials (E-361) has been assigned to the project site that will be administered by the New York City Mayor's Office of Environmental Remediation (OER). A Subsurface (Phase II) Investigation of the project site will be implemented in accordance with a November 2014 Work Plan that has been reviewed and approved by New York City Department of Environmental Protection (NYCDEP) as per the December 19, 2014 letter. Additional review of the Work Plan would be conducted by OER if required. Based upon the findings of the investigation, a NYCDEP- or OER-approved Remedial Action Plan (RAP) will be implemented during construction. The RAP will address requirements for items such as soil stockpiling, soil disposal and transportation; dust control; quality assurance; and contingency measures, should petroleum

storage tanks or contamination be encountered during soil disturbance. Additionally, a NYCDEP- or OER-approved Construction Health and Safety Plan (CHASP) will be prepared for implementation during construction. The CHASP will identify potential hazards that may be encountered during construction and specify appropriate health and safety measures to be undertaken to ensure that subsurface disturbance is performed in a manner protective of workers, the community, and the environment (such as personal protective equipment, air monitoring, and emergency response procedures). With these measures in place, the proposed project would not result in any significant adverse hazardous materials impacts.

WATER AND SEWER INFRASTRUCTURE

The proposed project would increase the project site's water consumption, sewage generation, and stormwater runoff as compared to the No Action condition. However, the analysis finds that the proposed project would not result in any significant adverse impacts on the City's water supply, wastewater or stormwater conveyance, and wastewater treatment infrastructure.

WATER SUPPLY

The project site is not located in an area that experiences low water pressure and the proposed project would result in an incremental water demand of approximately 174,897 gallons per day (gpd). This increase in water demand does not meet the *CEQR Technical Manual* threshold requiring further analysis, and it is expected that there would be adequate water service to meet the incremental water demand resulting from the Mall enlargement, therefore that there would be no significant adverse impacts on the City's water supply.

SANITARY SEWAGE

The proposed project would result in an incremental increase of 102,379 gpd of sanitary sewage. This amount would represent approximately 0.36 percent of the average daily flow to the Oakwood Beach Wastewater Treatment Plant (WWTP). This volume would not exceed the WWTP's permitted capacity, and therefore would not create a significant adverse impact on the City's sanitary sewage conveyance and treatment system.

STORMWATER

The overall volume of stormwater runoff and the peak stormwater runoff rate from the project site is expected to increase slightly as a result of the proposed project, due to the reconfiguration of the project site's surface area to include additional rooftop area with a reduction of paved parking area, but would remain below the permitted flow rate for the project site under the NYCDEP site connection regulations. Best management practices (BMPs) would be implemented to reduce the amount of sanitary flow to the sewer system and treat stormwater before it is released as direct drainage. Overall, the proposed project would not result in a significant adverse impact on the City's wastewater conveyance and treatment system.

SOLID WASTE AND SANITATION

The proposed project would generate an estimated increment of 153,105 pounds (approximately 77 tons) per week of solid waste, which would be handled by commercial carters. This increase represents a negligible change relative to the approximately 13,000 tons of waste handled by commercial carters in New York City every day. The proposed project would not result in an increase in solid waste that would overburden available waste management capacity. It would also not conflict with, or require any amendments to, the City's solid waste management objectives as stated in the SWMP. Therefore, the proposed project would not result in a significant adverse impact on solid waste and sanitation services.

TRANSPORTATION

The proposed project would result in significant adverse impacts with respect to traffic. The proposed project would not result in significant adverse impacts with respect to transit, pedestrians, or parking.

TRAFFIC

Weekday midday and PM and Saturday midday and PM traffic conditions were evaluated at a total of 38 intersections which center around major arterials that serve the Mall, including Richmond Avenue, Richmond Hill Road, Forest Hill Road, and arterials farther away from the site that collect local traffic. These 38

Staten Island Mall Enlargement

CEQR No. 14DCP136R

Page 12

intersections, where project-generated trips are expected to be most concentrated, were analyzed for the reasonable worst-case scenario of the November to December shopping period post-Thanksgiving.

The traffic impact analysis indicates that there would be a potential for significant adverse impacts at 14 intersections during the weekday midday peak hour, at 26 intersections during the weekday PM peak hour, and at 24 intersections during both the Saturday midday and PM peak hours.

TRANSIT

The proposed action would not result in any significant adverse transit impacts with respect to subways and buses.

Subway

As there is no rail station within the vicinity of the Mall, it is expected that subway or other rail trips would be very low. Therefore the proposed project is not expected to result in significant adverse subway impacts.

Bus

The Mall is currently served by eleven NYC Transit bus routes, with several of these routes terminating in the vicinity of the Mall. With a relatively low level of new bus demand that would be concentrated in off-peak periods and distributed over a total of at least four bus routes, significant adverse bus impacts are not expected due to the proposed project.

PEDESTRIANS

The low level of anticipated project-generated pedestrian trips to and from the project site is not expected to be high enough to create any significant adverse impacts to sidewalks, crosswalks, and corner reservoir areas in and around the Mall.

PEDESTRIAN AND VEHICULAR SAFETY EVALUATION

Two intersections in the study area—Signs Road at Richmond Avenue and Forest Avenue at Richmond Avenue-Morningstar Road—experienced five or more pedestrian and/or bicyclist injury crashes in one or more years from 2010 to 2012, and is therefore at the threshold of a high accident location as per the *CEQR Technical Manual*. These intersections are not immediately adjacent to the Mall where project-generated pedestrian trips would be most concentrated. Additionally, crashes involving pedestrians often involve conflicts with turning vehicles. It is therefore important to note that, out of 334 and 436 project-generated vehicle trips per hour at the intersection of Signs Road at Richmond Avenue, only 31 and 40 vehicles per hour (vph) are turning movements during the weekday PM and Saturday midday peak hour, respectively. In addition, none of the 53 and 70 project-generated vehicle trips per hour at the intersection of Forest Avenue at Richmond Avenue-Morningstar Road during the weekday PM and Saturday midday peak hour, respectively, are turning movements. Therefore, given the low project-generated traffic passing through these already-signalized intersections, significant impacts on pedestrian/bicycle safety are not anticipated. However, pedestrian and bicyclist safety could potentially be improved at the intersection of Signs Road at Richmond Avenue by striping high visibility crosswalks and installing reminder signs for turning vehicles to yield to pedestrians.

PARKING

Even with the proposed net reduction of 367 parking spaces and new project-generated demand, the analysis showed that 79 percent and 90 percent of all parking spaces on the project site would be utilized during the weekday and Saturday holiday parking peaks, respectively. Because there would be enough accessory parking spaces to accommodate the new project demand, there would be no expected significant adverse impacts to on-street or public off-street parking facilities near the Mall.

AIR QUALITY

The analysis finds that the proposed actions would not result in significant adverse air quality impacts. Concentrations of carbon monoxide (CO) and fine particulate matter less than 10 microns in diameter (PM₁₀)

due to project-generated traffic at intersections near the project site would not result in any violations of National Ambient Air Quality Standards (NAAQS). It was also determined that CO and PM_{2.5} impacts from mobile sources associated with the proposed project would not exceed CEQR *de minimis* criteria. In addition, the proposed project's parking facility was found to result in no significant adverse air quality impacts. Based on a screening analysis, using conservative assumptions regarding floor area served by a single heating and hot water system stack, there would be no potential for significant adverse air quality impacts from the proposed project's heating and hot water systems on neighboring sensitive uses. Based on screening analyses, there would also be no potential for significant adverse impacts on air quality at proposed project uses from heating and hot water systems associated with other components of the proposed project (i.e., project-on-project impacts).

GREENHOUSE GAS EMISSIONS

The proposed project would result in annual GHG emissions of approximately 33,000 metric tons of CO₂ equivalent (CO₂e) from the operation of the buildings. Of that amount, approximately 30,000 metric tons of CO₂e would be emitted as a result of project-generated vehicle trips, while the remainder would be emitted as a result of grid electricity use and natural gas consumption on-site. The assessment of GHG emissions from project-generated vehicle trips is based on a highly conservative estimated estimate of the number of trips generated and distances traveled. These conservative assumptions regarding vehicle trip numbers were developed for assessing worst-case traffic conditions. In reality, the emissions generated from the proposed project vehicle trips would likely be much lower. Sustainable measures would be incorporated into the design and construction of the Project, which would decrease the potential GHG emissions. Based on the sustainable measures that would be included, the proposed project would be consistent with the City's emissions reduction goal, as defined in the *CEQR Technical Manual*.

NOISE

The analysis finds that the proposed project would not result in any significant adverse noise impacts due to operations of the proposed project.

The analysis finds that the maximum predicted noise level increase when comparing the Future With the Proposed Project to the Future Without the Proposed Project would be 1.0 dBA or less at all receptor sites. Noise level increases would be considered imperceptible, and they would be below the CEQR threshold for a significant adverse impact.

The building attenuation analysis concludes that there are no attenuation requirements for the Proposed Project. The worst case façade near the loading docks was predicted to have L₁₀ noise levels of 68.5 dBA and the *CEQR Technical Manual* guidance prescribes no minimum attenuation requirement for L₁₀ noise levels less than 70 dBA.

PUBLIC HEALTH

Public health is the effort of society to protect and improve the health and well-being of its population. Many public health concerns are closely related to hazardous materials, water quality, air quality, and noise. The *CEQR Technical Manual* defines as its goal with respect to public health "to determine whether adverse impacts on public health may occur as a result of a proposed project, and if so, to identify measures to mitigate such effects."

According to the *CEQR Technical Manual*, for most proposed projects, a public health analysis is not necessary. Where no significant unmitigated adverse impact is found in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise, no public health analysis is warranted. If, however, an unmitigated significant adverse impact is identified in one of these analysis areas, the lead agency may determine that a public health assessment is warranted for that specific technical area.

The proposed project would not result in unmitigated significant adverse impacts in any of the technical areas related to public health (hazardous materials, water quality, air quality, or noise). Therefore, the proposed

project would not have the potential for significant adverse impacts related to public health.

NEIGHBORHOOD CHARACTER

The proposed project would not substantially change the character of the neighborhood. The character of the study area is primarily defined by its large concentration of destination retail uses. In addition, residential uses and their supporting private open spaces and community facility uses also contribute to the neighborhood character. With the exception of transportation, the proposed project would not result in significant adverse impacts on any of the technical areas that could impact neighborhood character (including land use, socioeconomic conditions, open space, urban design and visual resources, and noise). As the study area already experiences high volumes of visitors due to its large concentration of destination retail uses, the proposed project would not affect the essential character of neighborhood. Mitigation measures would be implemented to reduce the effects of the significant adverse transportation impacts. While some of the significant adverse traffic impacts would not be fully mitigated, the unmitigated effects would not be substantial enough to adversely impact neighborhood character. In addition, the proposed project would not be expected to result in a combination of moderate effects to several elements that could cumulatively impact neighborhood character. Overall, the proposed project would be consistent with the existing character of the neighborhood and would not result in any significant adverse impacts on neighborhood character.

CONSTRUCTION

The potential traffic impacts during peak construction would be within the envelope of significant adverse impacts identified for the With Action condition. The proposed project would not result in significant adverse construction impacts related to air quality, noise, natural resources, hazardous materials, and other technical areas listed below.

TRANSPORTATION

The construction traffic increments would be substantially lower than the operational traffic increments for the full build-out of the proposed project. Therefore, the potential traffic impacts during peak construction would be within the envelope of significant adverse traffic impacts identified for the With Action.

AIR QUALITY

Construction activities associated with the proposed project would not result in any significant adverse stationary or mobile source air quality impacts. Overall, the air quality effects during construction would be temporary and limited. The portions of the surrounding area containing residential communities with supporting private open space and community facility uses—which are located east and north of the project site—would be generally located at some distance away from the construction activities. Based on the increased distance to these sensitive receptor locations, air emissions generated by construction activities would be greatly dispersed before reaching the receptors, and would result in very low concentration increments.

NOISE

The proposed project would not result in significant adverse impacts with respect to construction noise. The noise generated by construction activities for the proposed project would not be considered out of the ordinary in terms of intensity, and the overall duration of noise-intensive activities would be below the 24-month *CEQR Technical Manual* threshold. In addition, construction of the proposed project would be required to follow the requirements of the *New York City Noise Control Code* for construction noise control measures to minimize noise disruption during construction.

NATURAL RESOURCES

Construction of the proposed project would not result in significant adverse impacts in the areas of groundwater, floodplain, wetlands, vegetation and ecological communities, and wildlife. In addition, construction of the proposed project would have no direct or indirect effects on any individuals of these species potentially occurring in the area.

HAZARDOUS MATERIALS

Construction of the proposed project would not result in any significant adverse hazardous materials impacts. The potential for adverse impacts associated with the construction of the proposed project would be minimized by adhering to certain protocols, including performing of a subsurface investigation at the project site, implementation of a DEP- or an OER-approved RAP if necessary, and implementation of a DEP- or OER-approved CHASP during excavation and construction activities to protect workers and the community from potentially significant adverse impacts associated with contaminated soil and/or groundwater. Any disturbance of building materials would be in compliance with applicable regulatory requirements relating to testing and work practices associated with asbestos-containing materials (ACM), lead-based paint (LBP) and polychlorinated biphenyls (PCBs). If dewatering is necessary for the proposed construction, water would be discharged to sewers in accordance with New York State Department of Environmental Conservation (NYSDEC) State Pollutant Discharge Elimination System (SPDES) and NYCDEP sewer use.

OTHER TECHNICAL AREAS

Construction of the proposed project would also not result in significant adverse construction impacts in the areas of vibration, land use and neighborhood character, socioeconomic conditions, community facilities, open space, and historic and cultural resources.

MITIGATION

TRAFFIC

The weekday midday and PM and Saturday midday and PM traffic conditions were evaluated at a total of 38 intersections which center around major arterials that serve the Mall, including Richmond Avenue, Richmond Hill Road, Forest Hill Road, and arterials farther away from the site that collect local traffic. These 38 intersections, where project-generated trips are expected to be most concentrated, were analyzed for the reasonable worst-case scenario of the November to December shopping period post-Thanksgiving. The traffic impact analysis indicates that 14, 26, 24, and 24 intersections would be significantly adversely impacted in the weekday midday, weekday PM, Saturday midday, and Saturday PM peak hours, respectively. In addition, 19, 37, 43, and 35 lane groups would be significantly adversely impacted in the weekday midday, weekday PM, Saturday midday, and Saturday PM peak hours, respectively.

The recommended mitigation measures to address significant adverse impacts consist of standard signal timing changes and lane reconfiguration. These measures, which are subject to review and approval by the NYCDOT, are considered readily implementable measures as per the *CEQR Technical Manual*. However, at one intersection (the unsignalized intersection of Staten Island Mall East Driveway at Marsh Avenue), the impact on the Mall East Driveway left lane group could only be mitigated by installing a new signal. Therefore, a signal warrant analysis was conducted as per requirements of the Manual of Uniform Traffic Control Devices (MUTCD), 2009 Edition. The signal warrant analysis concluded that Warrant 3A-Peak Hour was satisfied, and therefore the signal would be warranted. In addition, at the intersection of Platinum Avenue and Staten Island Mall Drive, the significant adverse impact could be mitigated by adding to the existing Platinum Avenue signal a left turn phase onto Staten Island Mall Drive. The Applicants have committed to the installation of a new signal and the addition of a left turn phase on an existing signal as described above, and this commitment would be incorporated into a Restrictive Declaration.

Totals of 9, 16, 11, and 12 intersections could be fully mitigated in the weekday midday, weekday PM, Saturday midday, and Saturday PM peak hours, respectively. One, zero, one, and three intersections could be partially mitigated (one or more significantly adversely impacted lane groups at an intersection could be mitigated, but one or more lane groups at the intersection would remain significantly adversely impacted) in the weekday midday, weekday PM, Saturday midday, and Saturday PM peak hours, respectively; and 4, 10, 12, and 9 intersections would remain unmitigated in the weekday midday, weekday PM, Saturday midday, and Saturday PM peak hours, respectively.

The following intersections could not be mitigated in one or more peak hours:

Staten Island Mall Enlargement

CEQR No. 14DCP136R

Page 16

- Richmond Hill Road at Richmond Avenue,
- Forest Hill Road at Richmond Avenue,
- Richmond Hill Road at Forest Hill Road,
- Victory Boulevard at Richmond Avenue,
- Signs Road at Richmond Avenue,
- Draper Place at Richmond Avenue,
- Nome Avenue at Richmond Avenue,
- Drumgoole Road West at Richmond Avenue,
- Richmond Road at Arthur Kill Road-Richmond Hill Road, ~~and~~
- Arthur Kill Road at Corbin Avenue,
- Arthur Kill Road at Drumgoole Road West, and
- Rockland Avenue at Forest Hill Road.

In addition, the following intersections could be partially mitigated in one or more time periods:

- Richmond Hill Road at Richmond Avenue,
- Platinum Avenue at Staten Island Mall Drive,
- Draper Place at Richmond Avenue, and
- Rockland Avenue at Forest Hill Road.

ALTERNATIVES

The proposed actions are necessary to facilitate new commercial development on the project site. Expanded retail uses on the project site are intended to fulfill the surrounding community's demand for additional commercial goods and services, and would promote the retention of sales and economic activity within Staten Island. Also, the proposed project would occur on underutilized land within an existing concentration of retail uses. Currently, despite the commercial success of the Mall, the surface parking lots surrounding the mall are underutilized. In 2012, surveys of parking utilization found that utilization of the existing parking lots was typically 50 percent, and never exceeded 60 percent. Neither the No Build Alternative nor the No Unmitigated Significant Impacts Alternative would substantively meet the goals and objectives of the proposed project, as summarized below. Other potential alternatives to the proposed actions—including lesser density alternatives—were considered, but were found not to substantively reduce the impacts of the proposed project while still meeting the project's stated purpose and need.

NO BUILD ALTERNATIVE

The No Build Alternative assumes no discretionary actions would occur and that that no new development would occur on the project site. This alternative would avoid the proposed project's significant adverse traffic impacts. However, in this alternative, there would be no enlargement of the Mall, an existing commercial center that is accessible to major roadways, including Richmond Avenue and the West Shore Expressway, and that is near central Staten Island's numerous residential neighborhoods. The No Build Alternative would not meet the goals and objectives of the proposed project which is to expand retail uses on the project site which the Applicants believe would fulfill the surrounding community's demand for additional commercial good and services, and would promote the retention of sales and economic activity within Staten Island.

NO UNMITIGATED SIGNIFICANT ADVERSE IMPACTS ALTERNATIVE

In order to determine the maximum density that would result in no unmitigated significant traffic impacts, sensitivity analysis was conducted to determine the With Action auto increment that the traffic network could accommodate with no potential for significant adverse impacts. It was estimated that the Mall enlargement would not be able to exceed 25,000 gross square feet (gsf) of destination retail space, and would not be able to accommodate a supermarket or movie theater, in order for the street network to have no intersections with potentially unmitigated significant adverse impacts. Specifically, the addition of fewer than five cars during all four peak periods analyzed would trigger a potential traffic impact that could not be fully mitigated on the northbound through-right lane group at the intersection of Rockland Avenue and Forest Hill Road. Due to

existing congested conditions at a number of intersections, even a minimal increase in traffic would result in unmitigated significant traffic impacts at that location. Given that any new development on the project site in excess of approximately 25,000 gsf could result in unmitigated significant impacts in the area of transportation, there is no alternative that could be advanced to completely avoid such impacts without substantially compromising the Project's goals and objectives.

UNAVOIDABLE ADVERSE IMPACTS

The proposed traffic mitigation measures include new roadway configurations, signalization, and signal timing measures that seek to avoid or reduce the levels of congestions and delays at study area intersection and would generally improve area traffic conditions. A total of 9 intersections could be fully mitigated during the weekday midday peak hour, 16 intersections could be fully mitigated during the weekday PM peak hour, 11 intersections could be fully mitigated during the Saturday midday peak hour, and 12 intersections could be fully mitigated during the Saturday PM peak hour. However, one intersections could only be partially mitigated during the weekday midday hour, zero intersections could only be partially mitigated during the weekday PM peak hour, and one intersections could only be partially mitigated during the Saturday midday peak hour, and three intersections could only be partially mitigated during the Saturday PM peak hour. In addition, 4 intersections would remain unmitigated during the weekday midday peak hour, 10 intersections would remain unmitigated during the weekday PM peak hour, 12 intersections would remain unmitigated during the Saturday midday peak hour, and 9 intersections would remain unmitigated during the Saturday PM peak hour. Therefore, the Proposed Action would result in unavoidable significant adverse traffic impacts at these intersections. The list of these intersections is provided in the *Mitigation* section above.

GROWTH-INDUCING ASPECTS OF THE PROPOSED PROJECT

The term "growth-inducing aspects" generally refers to the potential for a proposed project to trigger additional development in areas outside the project site that would otherwise not have such development without the proposed project. The *CEQR Technical Manual* indicates that an analysis of the growth-inducing aspects of a proposed project is appropriate when the project:

- Adds substantial new land use, new residents, or new employment that could induce additional development of a similar kind or of support uses, such as retail establishments to serve new residential uses; and/or
- Introduces or greatly expands infrastructure capacity.

The proposed actions would facilitate the development of approximately 426,576 gsf of local and destination retail uses, including restaurant space, an enlargement of the existing Macy's department store, a supermarket, and cinema space—all of which are similar or complimentary to existing retail uses on the site, which comprise the 1.27-million-gsf Mall. While the proposed project would add a substantial amount of retail to the project site, this retail would support the existing businesses at the Mall. The area already has a well-established retail market anchored by the existing Mall, and therefore the proposed project would not alter the land use mix of the study area, nor would it introduce new economic activities that would alter existing economic patterns. The retail uses added by the proposed project would generate additional foot traffic within the Mall and additional vehicle traffic to retail uses near the Mall, which would be expected to increase the customer base for existing businesses. While the proposed project would result in a cinema, which is a use not present on the project site, this use would be a complementary entertainment use that would be expected to increase the customer base within and surrounding the Mall. The cinema use would therefore not result in any land use conflicts or alter existing economic patterns.

While the new uses would be expected to contribute to growth in the City and State economies, they would not be expected to induce additional notable growth outside the project site. It is not anticipated that the proposed enlargement would increase the local population of the area, since it is expected that many of the new jobs would go to residents already living in the surrounding area. It is possible that development resulting from the proposed actions and other developments in the area could prompt some new retail development from those looking to capitalize on the area's increased consumer base. Induced commercial development, if it were to occur, would be limited and would likely include stores catering to the new workers and shoppers. The

projected 60.9 percent capture rate for department stores suggest that additional department stores could be developed without generating competitive impacts on existing and planned stores. In addition, the projected 65.3 percent capture rate for grocery stores suggest that additional grocery stores could be developed without generating competitive impacts on existing and planned stores. However, the above-described growth potential would be more closely tied to demand generated by the area's residential population rather than an incremental consumer base generated by the proposed project.

Because the proposed project would enlarge an existing commercial center, it would not require major new infrastructure. The infrastructure (e.g. sewers or water supply) in the study area is sufficiently well-developed and the proposed actions would not result in an enlargement of infrastructure capacity in the surrounding area. The site is accessible to major roadways, including Richmond Avenue, and is in close proximity to the West Shore Expressway. It is also located near central Staten Island's numerous residential neighborhoods. Overall, the proposed actions are not expected to induce any significant additional growth beyond that identified and analyzed in this EIS.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

With the proposed project there are a number of resources, both natural and built, that would be expended in the construction and operation of the enlargement of the Mall. These resources would include the materials used in construction; energy in the form of gas and electricity consumed during construction and operation of the proposed project; and the human effort (i.e., time and labor) required to develop, construct, and operate various components of the proposed project. These resources are considered irretrievably committed because their reuse for some purpose other than the proposed project would be highly unlikely. The proposed enlargement of the Mall would constitute an irreversible and irretrievable commitment of the project site as a land resource, thereby rendering land use for other purposes infeasible, at least in the near term. These commitments of materials and land resources are weighed against the benefits of the proposed actions, which would facilitate commercial development on underutilized land within an existing concentration of retail uses.



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