The term "growth-inducing aspects" generally refers to the potential for a proposed project to trigger additional development at locations beyond the project site that would not otherwise experience such development. The 2014 *City Environmental Quality Review (CEQR) Technical Manual* states that an analysis of growth-inducing aspects is appropriate when the proposed action: (1) 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 (2) introduces or greatly expands infrastructure capacity (e.g., sewers, central water supply). Since the proposed project would result in a sizable land use change with a new retail use and substantial employment, and would extend infrastructure along Richmond Valley Road, an analysis of potential growth inducing aspects was performed.

As noted in Chapter 1, "Project Description," the Proposed Project would result in an approximately 589,619-gsf commercial center, associated accessory parking, waterfront open space, street and infrastructure improvements, and wetland protection and enhancement, constructed on land that is currently vacant (with the exception of the unoccupied residential building, the Cole House, on Lot 6).

As discussed in Chapter 2, "Land Use, Zoning, and Public Policy," the Proposed Project would not result in any significant changes or adverse impacts in land use or zoning conditions, or land use trends, which also includes a number of new residential and retail developments that are expected to be completed by the Proposed Project's 2019 build year. To implement the Proposed Project requires special permits, authorizations, and certifications from the New York City Planning Commission (CPC) which include, but are not limited to: (a) Special Permits allowing large-scale retail establishments with no limitation on floor area per establishment in an M1-1 zoning district as well as modifications to applicable waterfront zoning requirements to allow a commercial building greater than 30 feet in height and to alter yard requirements; (b) authorizations modifying the certain requirements applicable to lands within the Special South Richmond Development District (SSRDD), as well as certain requirements applicable to waterfront zoning lots (collectively, the "Proposed Actions"). These Proposed Actions would apply only to the proposed Project Site and would not affect zoning conditions at any other sites; therefore, the proposed zoning actions would not allow or induce other additional development off of the Project Site.

As discussed in detail in Chapter 3, "Socioeconomic Conditions," the retail uses added by the Proposed Project would serve an unmet demand on Staten Island as would the proposed cinema and supermarket. Any additional development that may seek to take advantage of the increased consumer traffic and customer base drawn to the Project Site would be constrained by the limited amount of developable land in the area (which includes wetlands that are protected from development) as well as restrictions in the existing zoning. In particular, the area is largely zoned for manufacturing (M1-1 and M3-1), which does not permit residential development; additionally, as stated above, the existing M1-1 zoning district regulates development of retail uses exceeding 10,000 square feet through the Special Permit process, which is a discretionary

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action. The Proposed Project site and much of the surrounding area is also within the SSRDD, which controls development by protecting natural features such as trees and topography.

Finally, all the street and infrastructure improvements that are proposed to be installed with the Proposed Project would improve services to the Project Site and would not create new or expanded capacity or opportunities to serve other properties.

For the above reasons, it is concluded that the Proposed Project would not result in any induced growth that would generate additional impacts beyond those identified for the Proposed Project. \*