

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 (see **Figure 1-1**). 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.

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 (see proposed site plan in **Figure 1-2**). 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 an existing 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

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.

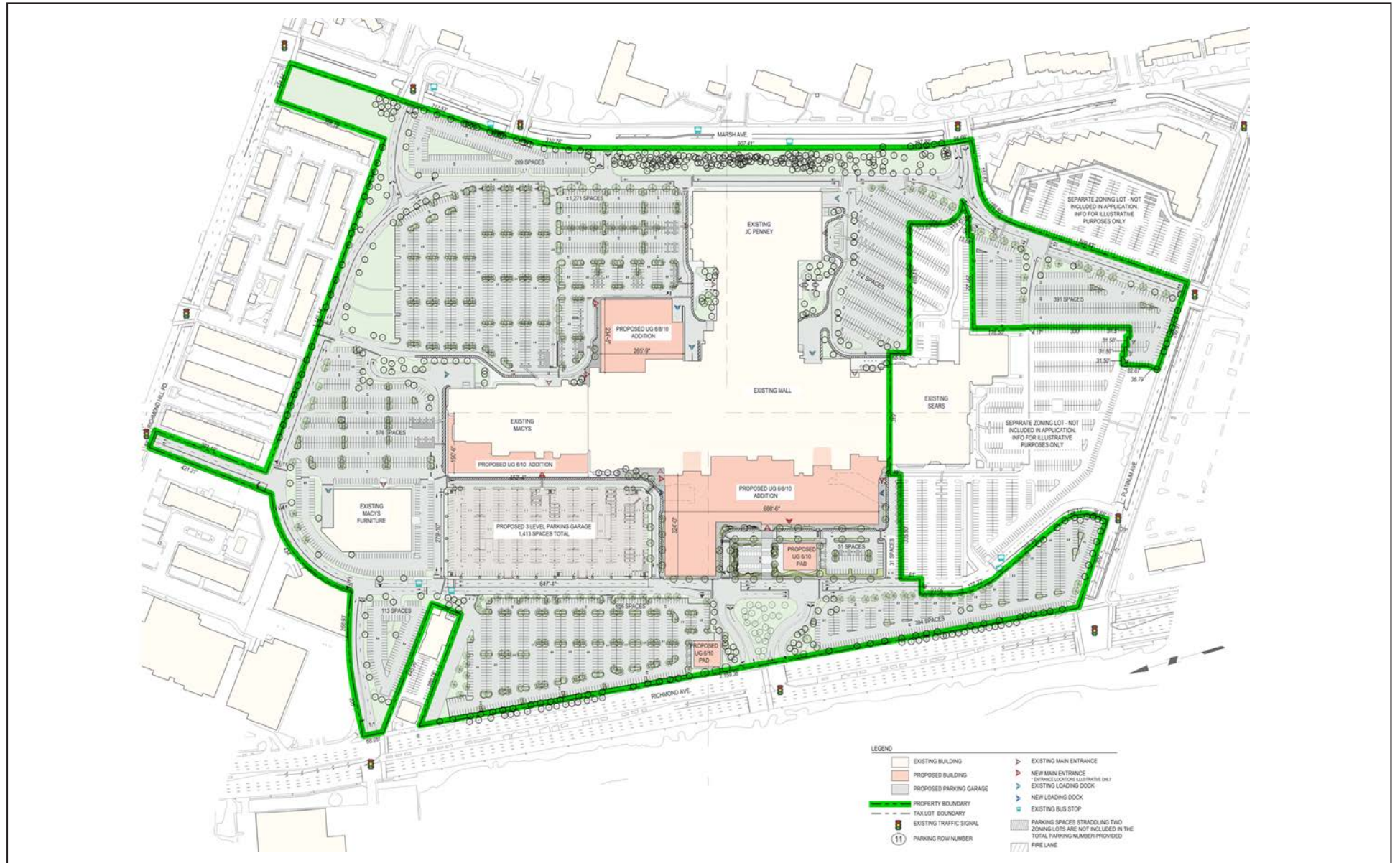
² Under the 2019 Full-Build Scenario, the project site would contain 5,235 parking spaces by 2017 and 5,477 spaces upon completion of the Macy's enlargement by 2019.

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 Staten Island Mall

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Staten Island Mall Enlargement

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).

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 identified in Chapter 17, Mitigation 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. As shown on **Figure 1-3**, 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.

DESCRIPTION OF THE PROPOSED PROJECT

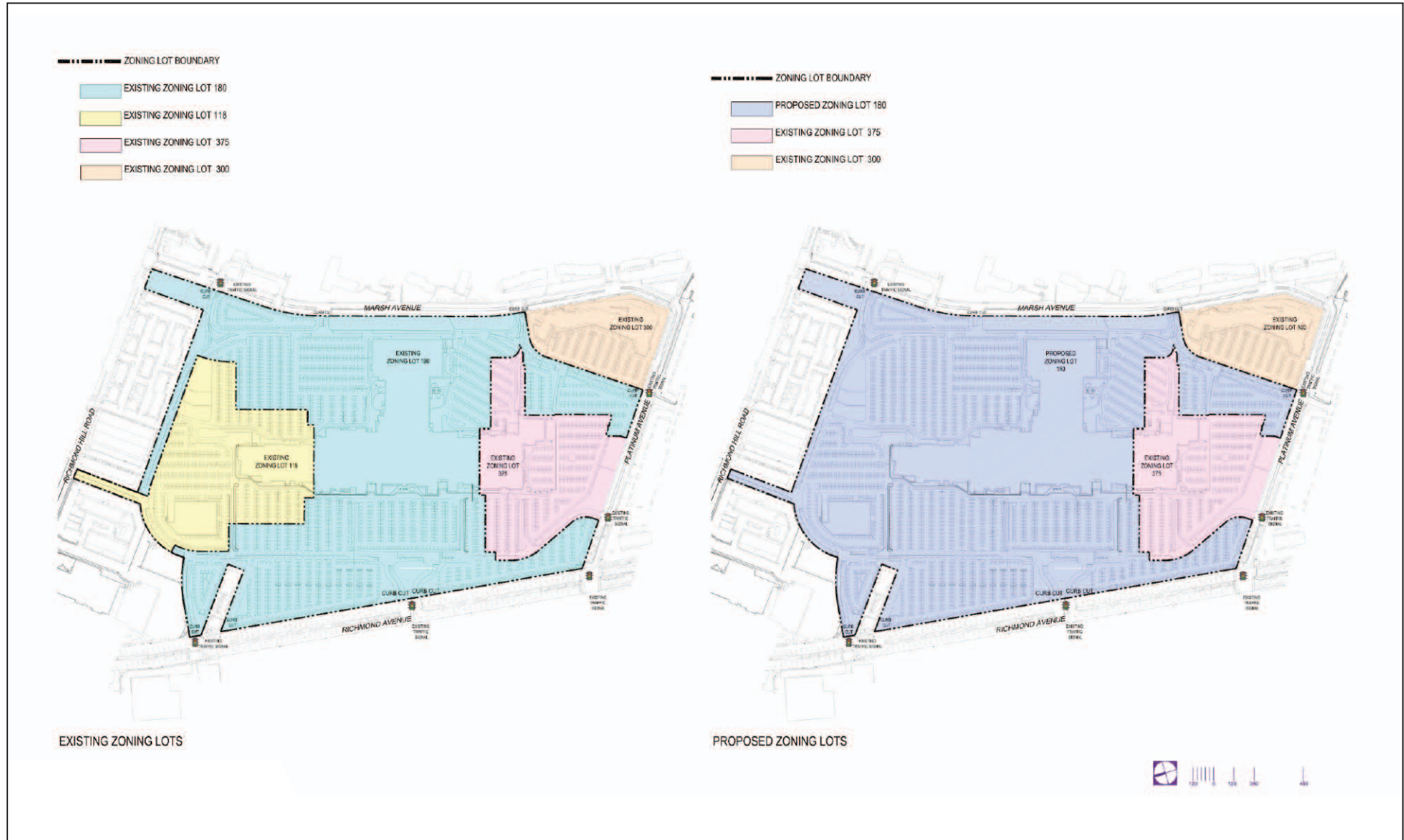
RETAIL PROGRAM

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 1-1** presents the size of each retail use component of the development program.

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

³ Approximately 64 parking spaces straddle the Mall and Sears zoning lots, and are not included in the Mall or the Sears parking space figure, but are included in the total number of spaces.

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 1-1**.



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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.

**Table 1-1
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	

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 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.

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 DFEIS, no deductions from GSF to ZSF were assumed and common/service/receiving areas were treated as general retail space.

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.

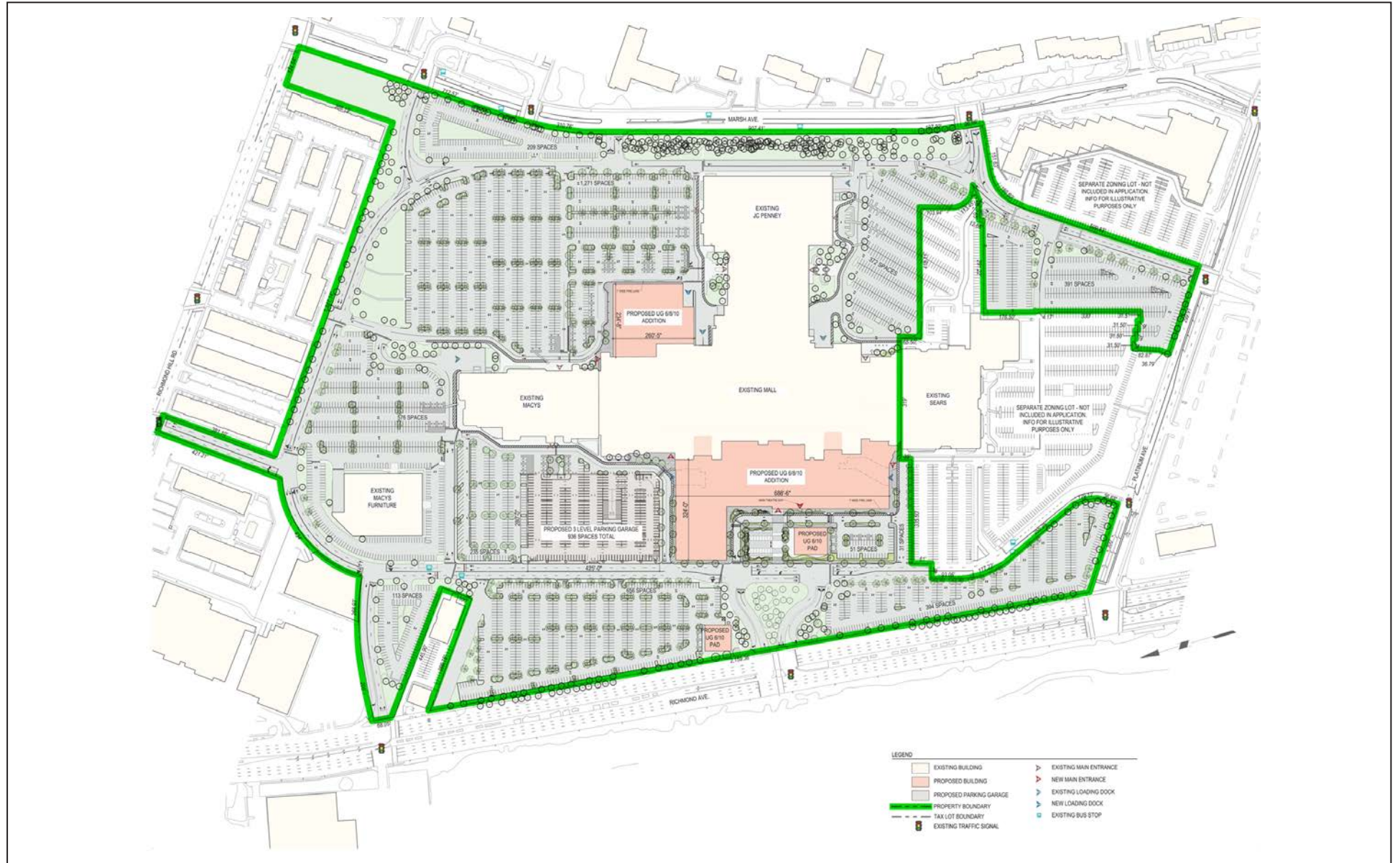
C. BUILD YEAR

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).⁶ 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 evaluates 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 potential significant adverse impacts greater than those identified in the 2019 analysis.

⁶ **Figure 1-4** illustrates the 2017 site plan assuming a delay in the proposed 75,000-gsf enlargement of the Macy's department store. As shown in the figure, the proposed parking structure would not be fully built out by 2017 under this scenario, and would provide approximately 936 parking spaces in this interim condition. Approximately 1,542 existing spaces would be displaced to accommodate the proposed project in this interim condition, resulting in a total of 5,238 spaces on the project site, and a net reduction of 606 spaces as compared to existing conditions. By 2019, both the Macy's department store and structured parking would be enlarged so as to provide 5,477 total parking spaces on the project site.



2017 Interim Condition under the 2019 Full-Build Scenario
Figure 1-4

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 provision of structured parking beyond that currently proposed would be economically feasible, due to its cost.

It is the Applicants' 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 *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 (as identified in Chapter 2, "Land Use, Zoning, and Public Policy"), 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 reasonable worst-case development scenario (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 1-1** and shown on the proposed site plan (**Figure 1-2**). 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 1-2**).

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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 1-2
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:	¹ The numbers of parking spaces do not include 64 spaces that straddle the project site and the Sears zoning lot. ² Assumptions 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. PUBLIC REVIEW PROCESS

The above-described authorizations pursuant to ZR Section 36-023 require the approval of the City Planning Commission—a discretionary approval that is subject to the City’s CEQR procedures, which are described below.

While an Authorization is a discretionary approval, the Authorization process is not subject to the Uniform Land Use Review Procedure (ULURP) pursuant to Section 197-c of the City Charter. Upon completion of the land use application and the issuance of a declaration with respect to the Authorization’s potential to result in significant adverse environmental impacts, the Authorization application will be referred to the applicable local community board (in this case, Staten Island Community 2) for comment. Subsequent to the completion of the local community board’s comment period, the application will return to the City Planning Commission for decision.

NEW YORK CITY ENVIRONMENTAL QUALITY REVIEW (CEQR)

Pursuant to the State Environmental Quality Review Act (SEQRA) and its implementing regulations, New York City has established rules for its own environmental quality review, abbreviated as CEQR. The environmental review process provides a means for decision-makers to systematically consider environmental effects along with other aspects of project planning and design, to propose reasonable alternatives, to identify, and when practicable mitigate, significant adverse environmental effects. CEQR rules guide environmental review through the following steps:

- **Establish a Lead Agency.** Under CEQR, the “lead agency” is the public entity responsible for conducting the environmental review. The lead agency is typically the entity principally responsible for carrying out, funding, or approving the proposed action. For the Staten Island Mall Enlargement, the lead agency is DCP, acting on behalf of CPC.
- **Determine Significance.** The lead agency’s first charge is to determine whether the proposed action may have a significant impact on the environment. To make this determination, the lead agency prepared an Environmental Assessment Statement (EAS). Based on the information contained in the EAS, the lead agency determined that the proposed development plan could have the potential to result in significant adverse environmental impacts and issued a Positive Declaration, initiating the preparation of an EIS.
- **Scoping.** Once the lead agency issues a Positive Declaration, it must then issue a draft scope of work for the EIS. “Scoping,” or creating the scope of work, is the process of establishing the type and extent of the environmental impact analyses to be studied in the EIS. CEQR requires a public scoping meeting as part of the process. A public scoping meeting was held on the proposed project and EIS scope of work on July 24, 2014. A final scope of work, reflecting comments made during scoping, was issued by DCP on December 18, 2014.
- **DEIS.** In accordance with the final scope of work, a DEIS is prepared. The lead agency reviews all aspects of the document, calling on other City agencies to participate as appropriate. Once the lead agency is satisfied that the DEIS is complete, it issues a Notice of Completion and circulates the DEIS for public review. When a DEIS is required, it must be deemed complete before the ULURP application can also be found complete.
- **Public Review.** Publication of the DEIS and issuance of the Notice of Completion signals the start of the public review period. During this period, which must extend for a minimum of 30 days, the public may review and comment on the DEIS either in writing or at a public hearing convened for the purpose of receiving such comments. As noted above, when the CEQR process is coordinated with another City process that requires a public hearing, such as ULURP, the hearings may be held jointly. The lead agency must publish a notice of the hearing at least 14 days before it takes place and must accept written comments for at least 10 days following the close of the hearing. All substantive comments become part of the CEQR record and are summarized and responded to in the FEIS.
- **FEIS.** After the close of the public comment period for the DEIS, the lead agency will prepares a FEIS. The FEIS must incorporate relevant comments on the DEIS, in a separate chapter and in changes to the body of the text, graphics, and tables. Once the lead agency determines that the FEIS is complete, it will issues a Notice of Completion and circulates the FEIS.
- **Findings.** The lead agency (DCP, on behalf of CPC) and each involved agency (if any) will adopt a formal set of written findings, reflecting its conclusions about the potential for significant adverse environmental impacts of the proposed action, potential alternatives, and

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mitigation measures. The findings may not be adopted until 10 days after the Notice of Completion has been issued for the FEIS. Once findings are adopted, the lead and involved agencies may take their actions (or take “no action”). *