

**A. INTRODUCTION**

This chapter assesses the proposed project's potential impacts on the socioeconomic character of the area within and surrounding the project site, and within a broader retail trade area. As described in the *City Environmental Quality Review (CEQR) Technical Manual*, the socioeconomic character of an area includes its population, housing, and economic activities. Socioeconomic changes may occur when a project directly or indirectly affects any of these elements.

The proposed project would result in the enlargement an existing commercial center known as the Staten Island Mall (the Mall) with the development of approximately 426,576 gross square feet (gsf) of new uses. As described in Chapter 1, "Project Description," the Reasonable Worst-Case Development Scenario (RWCDS) for the proposed project includes 298,711-gsf of local and destination retail uses and 54,488 gsf of cinema space. Under the RWCDS, the additional space would be occupied by 33,665 gsf of restaurant space, 50,000 gsf of supermarket space, 75,000 gsf of additional space for the existing Macy's, and 54,488 gsf of cinema space. In conjunction with the retail enlargement, the proposed project includes the development of a new parking structure, as well as exterior landscape improvements. The overall number of parking spaces provided on the project site would decrease from an existing 5,844 spaces to the proposed 5,477 spaces.

In accordance with *CEQR Technical Manual* guidelines, this analysis considers whether development of the proposed project could result in significant adverse socioeconomic impacts due to: (1) direct displacement of residential population from a project site; (2) indirect displacement of residential population in a study area; (3) direct displacement of existing businesses from a project site; (4) indirect displacement of businesses in a study area due to increased rents; (5) indirect business displacement within a primary trade area due to retail market saturation; and (6) adverse effects on specific industries.

**PRINCIPAL CONCLUSIONS***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*

The 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*

The 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*

The 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.

**B. METHODOLOGY**

**BACKGROUND**

Although socioeconomic changes may not result in environmental impacts, they are disclosed if a project would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area.

In some cases, these changes may be substantial but not adverse. In other cases, these changes may be good for some groups but bad for others. The objective of the CEQR analysis is to disclose whether any changes created by the project would have a significant adverse impact on the area's population, housing, and/or economic activities as compared with what would happen in the future without the proposed project (the "No Action" condition). In this case, the No Action condition assumes that no new development would occur on the project site.

An assessment of socioeconomic impacts distinguishes between impacts on the residents and businesses in an area and separates these impacts into direct and indirect displacement for both of those segments. Direct displacement occurs when residents or businesses are involuntarily displaced from the actual site of the proposed project or sites directly affected by it. For example, direct displacement would occur if a currently occupied site were redeveloped for new uses or structures or if a proposed easement or right-of-way encroached on a portion of a parcel and rendered it unfit for its current use. In these cases, the occupants of a particular structure to be displaced can usually be identified, and therefore the disclosure of direct displacement focuses on specific businesses and a known number of residents and workers.

Indirect or secondary displacement occurs when residents, business, or employees are involuntarily displaced due to a change in socioeconomic conditions in the area caused by the proposed project. Examples include the displacement of lower-income residents who are forced to move due to rising rents caused by higher-income housing introduced by a proposed project. Examples of indirect business displacement include higher-paying commercial tenants replacing industrial uses when new uses introduced by a project cause commercial rents to increase. Unlike direct displacement, the exact occupants to be indirectly displaced are not known. Therefore, an assessment of indirect displacement usually identifies the size and type of groups of residents, businesses, or employees potentially affected.

Some projects may affect the operation and viability of a specific industry not necessarily tied to a specific location. An example would be new regulations that prohibit or restrict the use of certain processes that are critical to certain industries. In these cases, the CEQR review process may involve an assessment of the economic impacts of the project on that specific industry.

#### **DETERMINING WHETHER A SOCIOECONOMIC ASSESSMENT IS APPROPRIATE**

According to the *CEQR Technical Manual*, a socioeconomic assessment should be conducted if a project may be reasonably expected to create socioeconomic changes in the area affected by the project that would not be expected to occur in the absence of the project. The following screening assessment considers threshold circumstances identified in the *CEQR Technical Manual* and enumerated below that can lead to socioeconomic changes warranting further assessment.

- 1. Direct Residential Displacement: Would the project directly displace residential population to the extent that the socioeconomic character of the neighborhood would be substantially altered? Displacement of fewer than 500 residents would not typically be expected to alter the socioeconomic character of a neighborhood.***

The project site does not contain any residential uses. Therefore, the proposed project would not directly displace any residents, and an assessment of direct residential displacement is not warranted.

- 2. Direct Business Displacement: Would the project directly displace more than 100 employees? If so, assessments of direct business displacement and indirect business displacement are appropriate.**

The proposed project would not result in the displacement of any businesses or employees. Therefore an assessment of direct business displacement is not warranted.

- 3. Direct Business Displacement: Would the project directly displace a business whose products or services are uniquely dependent on its location, are the subject of policies or plans aimed at its preservation, or serve a population uniquely dependent on its services in its present location? If so, an assessment of direct business displacement is warranted.**

The proposed project would not result in the direct displacement of any businesses. Therefore, an assessment of direct business displacement is not warranted.

- 4. Indirect Displacement due to Increased Rents: Would the project result in substantial new development that is markedly different from existing uses, development, and activities within the neighborhood? Residential development of 200 units or less or commercial development of 200,000 square feet or less would typically not result in significant socioeconomic impacts. For projects exceeding these thresholds, assessments of indirect residential displacement and indirect business displacement are appropriate.**

The proposed project would not introduce any residential units. However, the proposed project would introduce commercial uses in excess of 200,000 sf; therefore, an assessment of potential indirect business displacement due to increased rents is warranted.

- 5. Indirect Business Displacement due to Retail Market Saturation: Would the project result in a total of 200,000 sf or more of retail on a single development site or 200,000 sf or more of region-serving retail across multiple sites? This type of development may have the potential to draw a substantial amount of sales from existing businesses within the study area, resulting in indirect business displacement due to market saturation.**

The proposed project would introduce retail uses in excess of 200,000 gsf; therefore, an assessment of potential indirect business displacement due to retail market saturation is warranted.

- 6. Adverse Effects on Specific Industries: Is the project expected to affect conditions within a specific industry? This could affect socioeconomic conditions if a substantial number of workers or residents depend on the goods or services provided by the affected businesses, or if the project would result in the loss or substantial diminishment of a particularly important product or service within the City.**

As the proposed project would result in development warranting an assessment of indirect displacement, an assessment of adverse effects on specific industries is necessary.

Based on the screening assessment presented above, the proposed actions warrant analyses of: indirect business displacement due to increased rents; indirect business displacement due to retail market saturation; and adverse effects on specific industries.

## **ANALYSIS FORMAT**

Based on *CEQR Technical Manual* guidelines, the analyses of indirect business displacement and adverse effects on specific industries begin with a preliminary assessment. The objective of

the preliminary assessment is to learn enough about the potential effects of the proposed project to either rule out the possibility of significant adverse impacts or determine that a more detailed analysis is required to fully determine the extent of the impacts. A detailed analysis, when required, is framed in the context of existing conditions and evaluations of the future without the proposed actions and the future with the proposed actions by the project build year.

A preliminary assessment was sufficient to conclude that the proposed actions would not result in any significant adverse socioeconomic impacts due to indirect business displacement or adverse effects on specific industries.

### **STUDY AREA DEFINITION**

According to the *CEQR Technical Manual*, the socioeconomic study area typically reflects the land use study area, and should reflect the scale of the project relative to the area's population. However, due to the size of the existing Mall, the 400-foot land use study area does not capture businesses outside of the Mall that would be affected by the scale of the project. Therefore, the study area for the analyses of indirect business displacement due to increased rents approximates a ½-mile perimeter around the project site (see **Figure 3-1**). The analysis of potential adverse effects on specific industries considers potentially-affected industries City-wide.

The assessment of indirect business displacement due to retail market saturation uses a "trade area" surrounding the project site, rather than the ½-mile study area described above. Trade areas are the areas within which the greatest numbers of repeat customers would be expected to be drawn. As defined by the Urban Land Institute's *Shopping Center Development Handbook*, trade areas for shopping centers similar to the proposed project in size and potential tenant mix would generally extend 12 miles from the site, and typical can be reached within a 30 minute drive. As discussed in detail in Step 2 of "Indirect Business Displacement Due to Market Saturation," because New York City has high population density and therefore high concentration of consumer spending potential, as well as concentration of retail options, trade areas for New York City retail developments are generally on the lower end of, or below, these industrywide standard ranges. For these reasons, the Primary Trade Area for the preliminary assessment of indirect business displacement due to retail market saturation is defined as Staten Island (see **Figure 3-2**).

### **DATA SOURCES**

Employment, retail sales, and retail demand data were obtained from ESRI, a commercial data provider. Estimates of retail sales for planned projects and the proposed project were based on March 2014 data for New York Metro Area Malls from the International Council of Shopping Centers, the Urban Land Institute's 2008 *Dollars and Cents of Shopping Centers*, and online sources. Land use and parcel data were collected from the New York City Department of Finance's Real Property Assessment Data (RPAD) 2013 database.

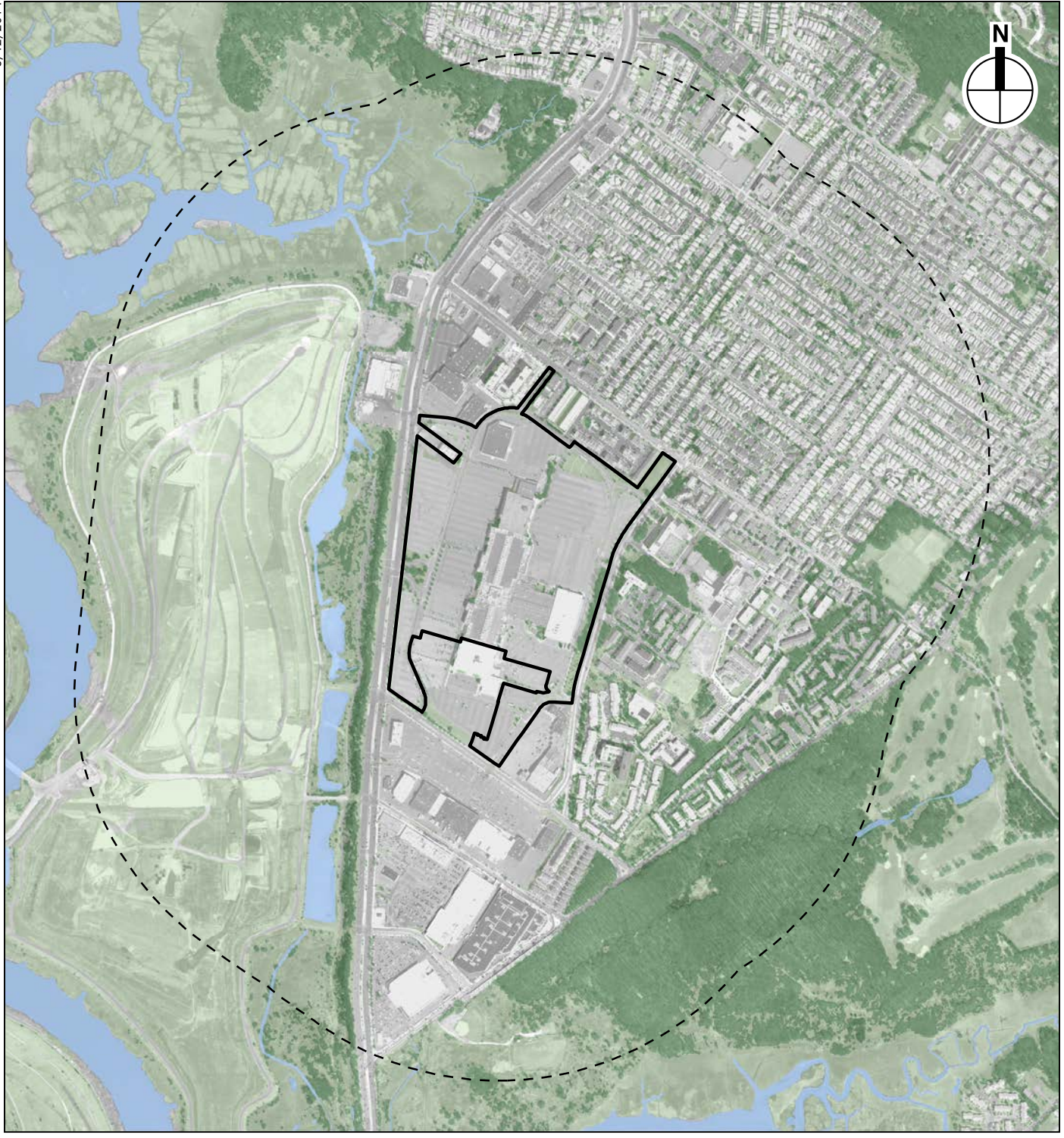
## **C. PRELIMINARY ASSESSMENT**

### **INDIRECT BUSINESS DISPLACEMENT DUE TO INCREASED RENTS**

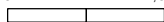
The preliminary assessment of indirect business displacement focuses on whether the proposed project could increase commercial property values and rents within the ½-mile study area such that it would become difficult for some categories of businesses to remain in the area. The



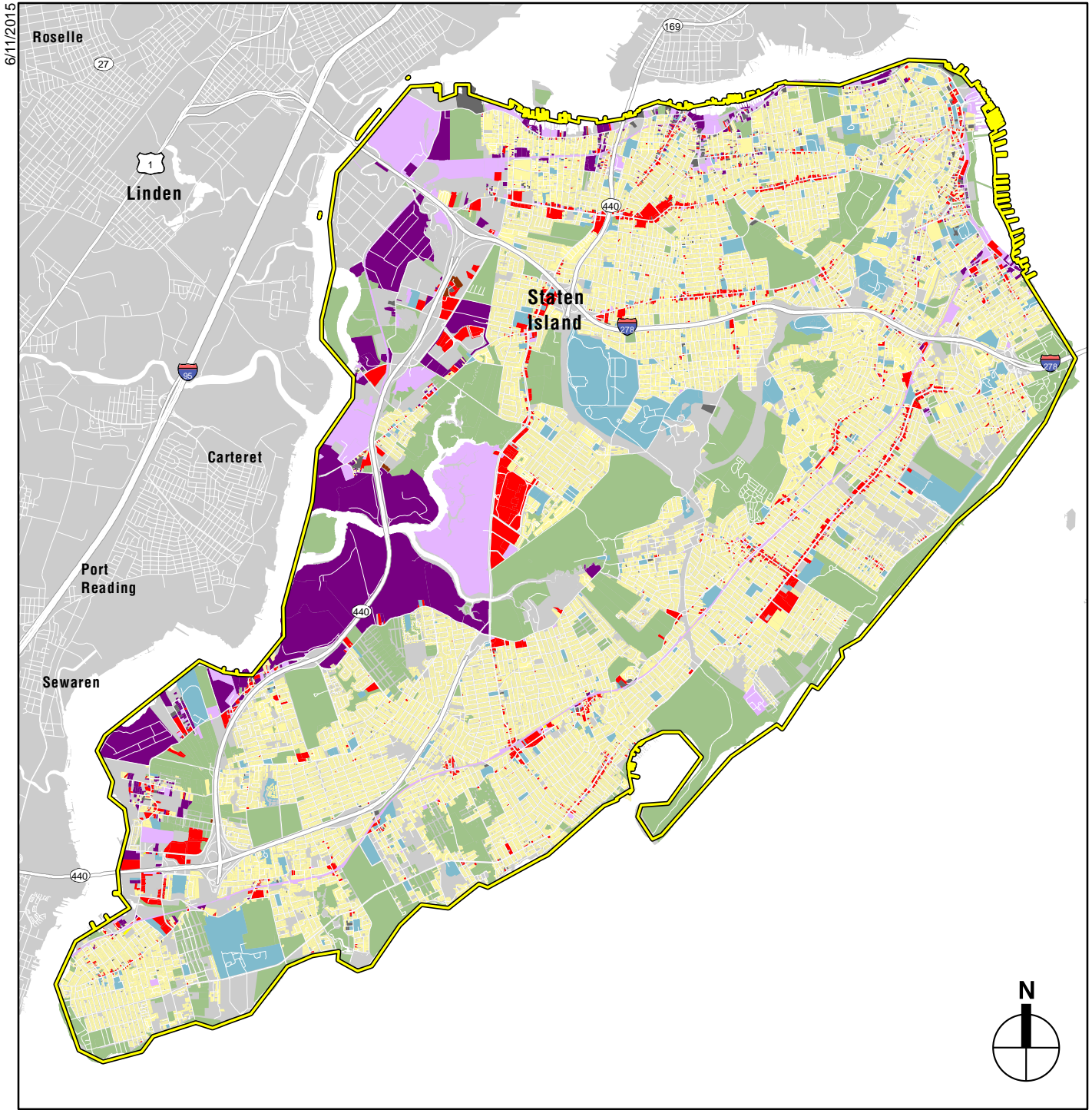
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 Project Site  
 1/2 Mile Study Area

0 1,000 FEET  






- |                                    |                                   |                                   |
|------------------------------------|-----------------------------------|-----------------------------------|
| Project Site                       | Commercial and Office Buildings   | Residential                       |
| Primary Trade Area                 | Hotels                            | Residential with Commercial Below |
| Industrial and Manufacturing       | Open Space and Outdoor Recreation | Transportation and Utility        |
| Parking Facilities                 | Vacant Land                       | Vacant Building                   |
| Public Facilities and Institutions | Under Construction                |                                   |

0 2 MILES  
SCALE

## Staten Island Mall Enlargement

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following three questions (numbered in italics below) address the potential for significant adverse indirect business displacement impacts.

- 1. Would the proposed actions introduce a trend that increases commercial property values, making it difficult for businesses essential to the local economy—or a business that is the subject of regulations or publicly adopted plans to preserve, enhance, or otherwise protect it—to remain in the study area?*

As shown in **Table 3-1**, over half of the total employment in the ½-mile study area (56.0 percent) is in the retail trade sector. This is over four times the percentage of employment in Staten Island as a whole, and over five times the percentage in New York City as a whole. This concentration of retail employment reflects the fact that most commercial use in the ½-mile study area comprises the Mall itself and adjacent shopping centers along Richmond Avenue. Currently, the ½-mile study area has 2.77 million square feet of retail, including 1.27 million sf of retail in the existing Mall. Directly south of the Mall, along Richmond Avenue are the Pergament Mall and the Richmond Shopping Center. Pergament Mall is a 350,000-sf center anchored by a Stop & Shop grocery store, Best Buy, Bed Bath & Beyond, and Toys R Us. The shopping center also includes other shoppers' goods stores. South of the Pergament Mall is the Richmond Shopping Center, which is anchored by a Pathmark grocery store and a Target store and contains other local-serving retail. There are smaller strip centers along Richmond Avenue directly north of the Mall that contain national chain shoppers' goods stores such as P.C. Richard and Sons and Barnes and Noble, as well as convenience goods businesses such as Trader Joe's, wine and liquor stores, Rite Aid, and limited service restaurants.

After retail, health care and social assistance and accommodation and food services account for the next highest percentages of employment (7.9 percent and 6.8 percent, respectively). The food services and accommodation sector in the ½-mile study area includes eating and drinking establishments in the shopping centers and within the Mall. The health care and social assistance sector includes several medical offices along Richmond Hill Road within the ½-mile study area. Accommodation and food services accounted for a higher percentage of employment in the ½-mile study area as compared to Staten Island and New York City. Health care and social assistance accounts for the largest percentage of employment in both Staten Island (16.7 percent) and New York City as a whole (13.3 percent).

The proposed project would result in the development of approximately 426,576 gsf, including 298,711-gsf of local and destination retail uses and 54,488 gsf of cinema space. As currently contemplated, the additional space would be occupied by a grocery store, cinema, restaurant space, food court, enlargement of the existing Macy's department store, other non-department store retail uses, and mall common area.

As described above, currently, the ½-mile study area has 2.77 million square feet of retail, including 1.27 million sf of retail in the existing Mall. Excluding the cinema and common, service, and receiving area space, the 298,711 gsf of retail space that would be introduced by the proposed project would represent a 10.8 percent increase over existing retail. The retail introduced by the proposed project would be similar to the types of stores at the existing Mall and would serve visitors to the existing Mall. This assessment considers whether the retail introduced by the proposed actions would alter economic patterns in a way that would make existing commercial uses vulnerable to indirect displacement due to increased rents. In general, existing retail businesses in the ½-mile study area would benefit from the increased foot traffic that would be created by the worker and visitor populations introduced by the proposed project.



**Table 3-1  
Employment by Industry Sector, 2013**

Type of Job by NAICS Category	Study Area		Richmond County		New York City	
	Employees	Percent	Employees	Percent	Employees	Percent
Agriculture, forestry, fishing and hunting	5	0.1%	49	0.0%	1,763	0.1%
Mining	0	0.0%	32	0.0%	579	0.0%
Utilities	0	0.0%	602	0.6%	6,202	0.2%
Construction	114	2.3%	7,055	6.6%	98,475	3.6%
Manufacturing	112	2.3%	2,649	2.5%	134,377	4.9%
Wholesale trade	105	2.1%	3,144	3.0%	134,961	4.9%
Retail trade	2,753	56.0%	14,232	13.4%	262,008	9.5%
Transportation and warehousing	45	0.9%	5,400	5.1%	87,970	3.2%
Information	81	1.6%	2,518	2.4%	121,842	4.4%
Finance and insurance	138	2.8%	2,713	2.6%	141,054	5.1%
Real estate and rental and leasing	57	1.2%	2,752	2.6%	97,850	3.6%
Professional, scientific, and technical services	150	3.1%	8,302	7.8%	312,067	11.3%
Management of companies and enterprises	2	0.0%	151	0.1%	9,544	0.3%
Administrative and support and waste management and remediation services	212	4.3%	8,715	8.2%	195,850	7.1%
Educational services	185	3.8%	10,635	10.0%	260,242	9.4%
Health care and social assistance	386	7.9%	17,700	16.7%	367,158	13.3%
Arts, entertainment, and recreation	7	0.1%	1,841	1.7%	54,091	2.0%
Accommodation and food services	333	6.8%	4,655	4.4%	135,326	4.9%
Other services (except public administration)	199	4.0%	6,395	6.0%	160,842	5.8%
Public administration	30	0.6%	6,699	6.3%	173,483	6.3%
<b>Total</b>	<b>4,915</b>	<b>100%</b>	<b>106,239</b>	<b>100%</b>	<b>2,755,684</b>	<b>100%</b>
<b>Notes:</b> Employees may not sum to total due to rounding.						
<b>Source:</b> ESRI Business Analyst Online, Inc., Business Summary Report, 2013 data.						

Retail stores in the existing Mall would be able to capitalize on additional foot traffic generated within the Mall, increasing sales and allowing them to afford potential increases in rents. Retail in the ½-mile study area located outside of the Mall would not experience such a direct benefit from the new foot traffic. However, these retail stores are deliberately located in close proximity to the Mall and would be expected to draw vehicle traffic due to their proximity to the Mall. As the proposed project would add to the existing concentration of retail at the Mall, the proposed project would not be expected to make it difficult for these businesses to remain in the area.

The 54,488-gsf cinema added by the proposed project would also not be expected to make existing commercial uses vulnerable to indirect displacement due to increased rents. While the cinema use would be new in the ½-mile study area, the entertainment use would be complementary to the retail uses in the Mall. Cinemas often anchor shopping centers like the Mall, and they often expand the customer base for the shopping centers in which they are located by generating customer traffic

## **Staten Island Mall Enlargement**

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throughout the centers before and after shows. Therefore, the cinema use would not be expected to make it difficult for existing businesses to remain in the area.

For these reasons, the proposed project would not be expected to alter or accelerate trends that would change existing economic patterns in the ½-mile study area in a manner that would result in significant displacement.

**2. *Would the proposed project directly displace uses of any type that directly support businesses in the area or bring people to the area that form a customer base for local businesses?***

As described above, the proposed project would not result in the direct displacement of any businesses or residents. Instead, the proposed project would add to an existing concentration of retail with an established customer base. The Mall would continue to attract customers, and the proposed project would be expected to draw new customers to other existing businesses in the Mall and outside of the Mall within the ½-mile study area. The proposed project also would increase the customer base for existing businesses by adding new workers to the project site.

**3. *Would the proposed project directly or indirectly displace residents, workers, or visitors who form the customer base of existing businesses in the study area?***

As described above, the proposed project would not result in the direct displacement of any businesses or residents, and would add additional retail use to the existing Mall. In addition, the proposed project is not expected to result in significant indirect displacement of businesses or residents. The proposed project would instead be expected to attract new customers and add new workers to the project site, increasing the customer base of existing businesses in the study area.

### **CONCLUSION**

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 to the proposed project site or to the study area 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 would be expected to capitalize on the increased customer base. The new cinema would add new, complementary entertainment use that would be expected to increase the customer base within and surrounding the Mall. Therefore, based on *CEQR Technical Manual* guidelines, the proposed project would not be expected to result in indirect business displacement due to increased rents.

### **INDIRECT BUSINESS DISPLACEMENT DUE TO MARKET SATURATION**

Projects resulting in the development of large, regional-serving retail may draw sales from existing businesses in an area. According to the *CEQR Technical Manual* this type of competitive pressure does not necessarily result in environmental impacts, especially in New York City, where increases in retail supply can usually be supported by high population density, population growth, visitor-generated sales, and overall purchasing power. However, competition can become an environmental concern if it has the potential to result in prolonged vacancy and disinvestment in neighborhood shopping areas, thereby affecting the character of the neighborhood.

The proposed project would include approximately 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 on the project site, exceeding the 200,000-sf CEQR threshold for a preliminary assessment of indirect business displacement due to market saturation. For projects exceeding the 200,000-sf threshold, the *CEQR Technical Manual* prescribes a step-by-step preliminary assessment that can be described as a “capture rate analysis,” presented below. Capture rates are measures of business activity in a trade area, comparing the amount of consumer expenditures for retail goods to the amount of retail sales in the trade area. According to the *CEQR Technical Manual*, if a capture rate—or retail sales divided by expenditure potential—exceeds 100 percent, then there is the potential for market saturation and a detailed analysis is required to determine whether the proposed project may capture retail sales from existing businesses to the extent that vacancies and disinvestment on neighborhood commercial streets would occur, thereby affecting land use patterns and the economic viability of the neighborhood.

*STEP ONE:*

***Determine whether the categories of goods to be sold at the proposed development are similar to the categories of goods sold in stores found on neighborhood retail streets within the study area.***

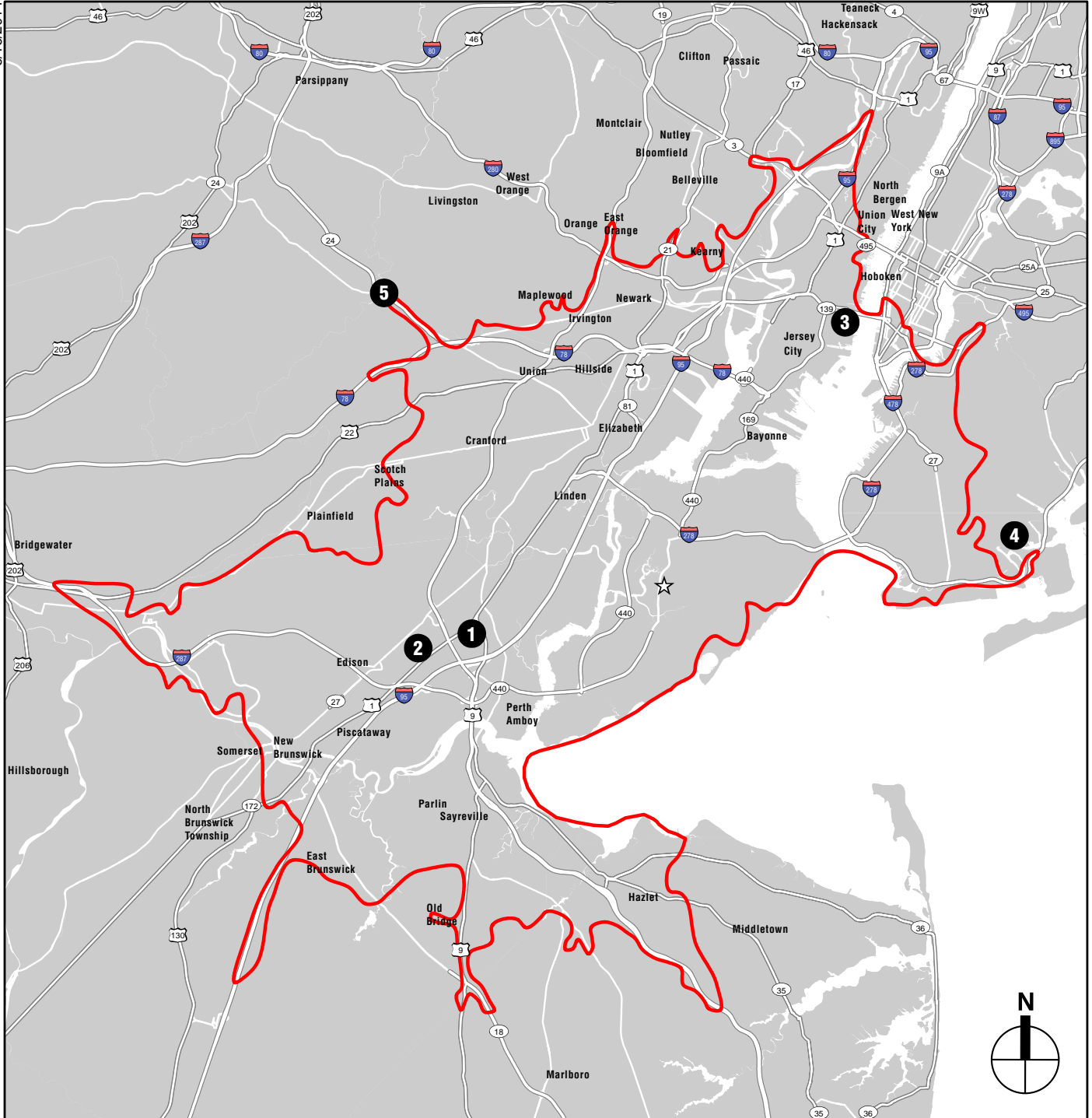
As currently contemplated, the proposed project would result in the development of approximately 426,576 gross square feet (gsf), including 298,711-gsf of local and destination retail uses and 54,488 gsf of cinema space. Providers of business sales and household expenditure data do not typically consider entertainment uses to be retail and do not report data for those uses as part of their retail reports. Therefore, sales and expenditures related to the proposed project’s 54,488-gsf cinema are addressed separately, below. In addition, common, service, and receiving areas are not included in the total square footage for purposes of sales and expenditures. Therefore, the total amount of proposed project retail analyzed in this capture rate analysis is 298,711 gsf.

Based on the RWCDS, the additional space would be occupied by a grocery store, cinema, restaurant space, food court, enlargement of the existing Macy’s department store, other non-department store (in-line) retail uses, and mall common, service and receiving area. Specific tenants for the enlargement have not yet been determined.

The Mall is the largest retail concentration in the Staten Island Primary Trade Area. It currently includes 1.27 million sf of retail, a majority of which is devoted to traditional department stores, apparel stores, and shoe stores. The mall is anchored by three department stores: JCPenney, Macy’s, and Sears.

While there are no other retail concentrations in the Staten Island Primary Trade Area that are comparable in size to the Mall, Staten Island is home to several large concentrations of retail that would have categories of retail goods similar to proposed project’s retail offerings (See **Figure 3-3**). Examples of comparable large retail concentrations include the Staten Island Pergament Mall, which is anchored by Stop & Shop, Raymour & Flanigan, Best Buy, and Toys R Us; the Richmond Shopping Center, which is anchored by Target and Pathmark; Hylan Plaza, which is anchored by Kmart, Pathmark, and United Artists Theater; Forest Avenue Commons, which is anchored by Lowe’s and Kohl’s; Forest Avenue Shopping Center, which is anchored by T.J.Maxx, Michaels, and Pathmark; Forest Promenade, which is anchored by ShopRite; and the

6/16/2014



☆ Project Site  
 30-Minute Drive Time

- 1 Woodbridge Center Mall
- 2 Menlo Park Mall
- 3 Newport Centre
- 4 Kings Plaza Shopping Center
- 5 The Mall at Short Hills



Shopping Centers within a 30-Mile Drive of the Project Site  
Figure 3-3



## **Staten Island Mall Enlargement**

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Bricktown Centre at Charleston, which is anchored by Target, Home Depot, Bed Bath & Beyond, and Christmas Tree Shops.

As described above, the proposed project would introduce 54,488 gsf of cinema space, including 12 screens and a total of approximately 2,500 seats. The cinema added by the proposed project could increase competitive pressure on some existing cinemas within the Primary Trade Area. There are three existing cinemas within the Primary Trade Area: Atrium Stadium Cinemas, located an approximately two-mile drive from the project site, United Artists Staten Island Stadium 16 RPX, located an approximately four-mile drive from the project site, and United Artists Hylan Plaza 5, located an approximately 4.5-mile drive from the project site. As described above, ESRI, the data provider utilized for the retail capture rate analysis, does not provide sales and household expenditure data for entertainment uses such as cinemas. However, based on a review of business and search engine sites such as manta.com and google.com, the spatial distribution of cinemas within the Primary Trade Area suggests that there is a potential market for a cinema in the project site area such that the planned cinema would not have competitive effects on existing cinemas. In fact, many areas appear to have greater concentrations of cinemas than what exists in the Primary Trade Area. This is particularly evident when comparing the Primary Trade Area with Nassau County, which has less than one quarter the population density of Richmond County but over five times as many cinemas. Overall, the proposed project's cinema is not expected to lead to the indirect displacement of existing cinemas in the Primary Trade Area, and therefore, no additional analysis of the project's potential effects on cinemas is necessary.

### *STEP TWO:*

#### ***Determine a Primary Trade Area for the proposed “anchor” stores—the largest stores in the proposed development that are expected to yield the largest proportion of retail sales.***

As described in the *CEQR Technical Manual*, an analysis of the potential effects of competition should encompass a primary trade area from which the bulk of new stores' sales are likely to be derived. Delineating the appropriate primary trade area depends on the size and the type of stores in the proposed project, as well as the transportation access, including roads and mass transit, physical barriers, and the location of large competitive retail facilities that might preclude the need to shop at the proposed project.

As defined by the Urban Land Institute's *Shopping Center Development Handbook*, trade areas for shopping centers similar to the proposed project in size and potential tenant mix would generally extend 12 miles from the site, and typical can be reached within a 30 minute drive. Because New York City has high population density and therefore high concentration of consumer spending potential, trade areas for New York City retail developments are generally on the lower end of, or below, these industrywide standard ranges. In addition to population density, the New York City region has a concentration of retail options that limit the need to drive 30 minutes to reach major retail offerings. In particular, as shown in **Figure 3-2**, there are several enclosed, super regional shopping centers located within 30 miles of the proposed project site, including Woodbridge Center Mall, in Woodbridge, New Jersey; Menlo Park Mall, in Edison New Jersey; Newport Centre, in Jersey City, New Jersey; Kings Plaza Shopping Center, in Brooklyn, New York; and The Mall at Short Hills, in Short Hills, New Jersey.

A primary trade area of 30 miles would therefore not be appropriate since many of those traveling from the more distant reaches of the trade area would be closer to existing super regional shopping centers than the Mall, and some would be traveling past existing super

regional shopping centers of equal or greater size to reach the project site. For example, residents of Newark, New Jersey are more likely to regularly visit Newport Centre or the Mall at Short Hills than the Staten Island Mall. Residents in Sayreville or South River would be more likely to regularly visit Woodbridge Center Mall or Menlo Park Mall than the Staten Island Mall. Residents in Brooklyn would be more likely to visit Kings Plaza Shopping Center than the Staten Island Mall. In addition, there are many smaller shopping centers within a 30 miles drive of the project site, such as regional shopping plazas and power centers, which contain similar retail in a slightly smaller format.

In addition, the location of the project site on Staten Island—surrounded by Arthur Kill, Newark Bay, and New York Bay—limits its attraction for residents of other New York City boroughs and New Jersey. While the network of roadways and bridges makes the project site easily accessible to areas outside of Richmond County, such as Brooklyn via the Verrazano Bridge, and New Jersey via the Goethals, Outerbridge Crossing and Bayonne bridges, tolls and trip length tend to limit Richmond County’s attractiveness as a shopping destination for those outside the county. As with the existing Mall, the proposed enlargement would likely draw a substantial number of customers from nearly every part of Staten Island because of its proximity to major roadways, its merchandise mix and critical mass of retail uses, and the economic constraints imposed by the various bridge tolls.

For these reasons, the Primary Trade Area for the preliminary assessment of indirect business displacement due to retail market saturation is defined as Staten Island (see **Figure 3-2**). The Staten Island Primary Trade Area is the area from which the greatest numbers of repeat customers would be expected to be drawn.

*STEP THREE:*

***Estimate sales volumes for relevant retail stores within the Primary Trade Area, i.e., stores that sell categories of goods similar to those expected to be offered by stores introduced by the proposed project.***

As described above, specific tenants for the enlargement have not yet been determined. Based on the RWCDS, the proposed project would include shoppers’ goods, including department stores and non-department store retail; a grocery store; and eating and drinking establishments including restaurant and food court space.<sup>1</sup> Shoppers’ goods are usually higher value goods—such as clothing, electronics, or furniture—for which consumers compare quality and price at more than one store before making a purchase. The eating and drinking establishment category includes restaurants, bars, and other special food services, such as caterers.

According to ESRI, a national provider of geographic planning and business data, retail sales at stores in the Staten Island Primary Trade Area totaled approximately \$16.6 billion in 2013 for the retail categories analyzed (see **Table 3-2**). Approximately 55 percent of these sales were at shoppers’ goods stores (\$971.5 million), of which only approximately 8 percent were at department stores (\$135.8 million). Grocery stores accounted for approximately 27 percent of sales (\$480.6 million), and eating and drinking establishments accounted for approximately 17 percent (\$306.5 million).

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<sup>1</sup> The cinema space is not included as retail for the purpose of the quantified capture rate analysis.

**Table 3-2**  
**Estimated Retail Sales in the Primary Trade Area, 2013**

Retail Category	Total Sales (Millions of 2014 Dollars)
Shoppers' Goods <sup>1</sup>	\$971.5
<i>Department Stores</i>	\$135.8
Grocery Stores	\$480.6
Eating and Drinking Establishments	\$306.5
<b>Total<sup>2</sup></b>	<b>\$1,758.5</b>
<p><b>Notes:</b></p> <p>1. Shoppers' Goods include: furniture and home furnishings stores; electronics and appliance stores; clothing and clothing accessories stores; sporting goods, hobby, book, and music stores; general merchandise stores; office supply, stationary, and gift stores; and used merchandise stores.</p> <p>2. Total does not reflect total for all retail—only those retail categories included in Shoppers' Goods, Grocery Stores, and Eating and Drinking Establishments. Retail establishments not included in this total are: Convenience Goods other than Grocery Stores, Auto-Related Businesses, Building Materials and Garden Supply, and Non-Store Retailers. Entertainment uses are also not included.</p>	
<p><b>Sources:</b> ESRI Business Analyst Online; AKRF, Inc.</p>	

*STEP FOUR:*

***Estimate the expenditure potential, or retail demand, for relevant retail goods of shoppers within the Primary Trade Area.***

Retail demand for any retail concentration can originate from a variety of sources, including local households and workers, businesses, tourists, and online sales. Data sources that report on both retail demand and sales tend to focus on demand from households in a defined geography and do not always address demand from workers, businesses, or tourists, which can be more difficult to pinpoint and relate directly to retail sales. (The U.S. Census Bureau compiles data on household expenditures by retail category but does not have a corresponding data set for spending by workers or tourists for defined geographies, and many data providers rely heavily on information from the U.S. Census Bureau.) It should be noted that the data sets available for this analysis provide retail demand estimates for the Staten Island Primary Trade Area's residential population (i.e., Staten Island residents), but do not include retail demand from workers, tourists, or other visitors who live outside of the Staten Island Primary Trade Area. Therefore, the data provided in this analysis may not capture the true magnitude of expenditure potential within the Staten Island Primary Trade Area. In this respect the analysis is conservative in that it underestimates the amount of demand for retail in the Primary Trade Area.

In 2013, households in the Primary Trade Area spent an estimated \$3.07 billion on goods for the retail categories analyzed (see **Table 3-3**). Approximately 55 percent was spent on shoppers' goods, of which approximately 8 percent was spent at department stores. Approximately 27 percent was spent at grocery stores, and approximately 17 percent was spent at eating and drinking establishments. On a per household basis, Staten Island Primary Trade Area residents spent an estimated \$9,578 annually on shoppers' goods, of which an estimated \$1,646 was spent at department stores. Primary Trade Area households spent an estimated \$5,387 at grocery stores and \$3,656 at eating and drinking establishments.

**Table 3-3**  
**Estimated Retail Demand in the Primary Trade Area**

Retail Category	Total Demand	Demand per Household
Shoppers' Goods <sup>1</sup>	\$1,580,300,000	\$9,577.8
<i>Department Stores</i>	<i>\$271,600,000</i>	<i>\$1,646.1</i>
Grocery Stores	\$888,800,000	\$5,387.0
Eating and Drinking Establishments	\$603,200,000	\$3,656.2
<b>Total<sup>2</sup></b>	<b>\$3,072,300,000</b>	<b>\$18,620.9</b>
<p><b>Notes:</b> 1. Shoppers' Goods include: furniture and home furnishings stores; electronics and appliance stores; clothing and clothing accessories stores; sporting goods, hobby, book, and music stores; general merchandise stores; office supply, stationary, and gift stores; and used merchandise stores.</p> <p>2. Total does not reflect total for all retail—only those retail categories included in Shoppers' Goods, Grocery Stores, and Eating and Drinking Establishments. Retail establishments not included in this total are: Convenience Goods other than Grocery Stores, Auto-Related Businesses, Building Materials and Garden Supply, and Non-Store Retailers. Entertainment uses are also not included.</p>		
<p><b>Sources:</b> ESRI, Inc.; AKRF, Inc.</p>		

*STEP FIVE:*

***Compare retail sales (Step Three) with retail demand (Step Four) to develop a “capture rate,” which can help determine whether the Primary Trade Area is currently saturated with retail uses or whether there is likely to be an outflow of sales from the area.***

Capture rates measure business activity in a given trade area by indicating the percentage of consumer expenditures for retail goods that are being captured by retailers in that area. If the total sales in the trade area are much lower than the area's expenditure potential, then it is likely that residents are spending a large portion of their available dollars outside of the trade area, and the capture rate is low. If sales are closer in value to expenditure potential, then area residents are likely spending a higher proportion of their available resources within the trade area, and the capture rate is high. As shown in **Table 3-4**, the capture rate for the retail categories analyzed is 57.2 percent, with a capture rate of 50.0 percent for department stores, 54.1 percent for grocery stores, and 50.8 percent for eating and drinking establishments.



**Table 3-4**

**Household Retail Expenditures and Total Retail Sales, Primary Trade Area<sup>1</sup>**

<b>Retail Category</b>	<b>Retail Sales in Primary Trade Area (\$ millions)</b>	<b>Retail Demand from Primary Trade Area Households (\$ millions)</b>	<b>Amount Not Being Captured in Primary Trade Area (\$ millions)</b>	<b>Primary Trade Area Capture Rate</b>
Shoppers' Goods	\$971.48	\$1,580.26	\$608.77	61.5%
<i>Department Stores</i>	\$135.78	\$271.59	\$135.81	50.0%
Grocery Stores	\$480.60	\$888.81	\$408.21	54.1%
Eating and Drinking Establishments	\$306.46	\$603.24	\$296.78	50.8%
<b>Total<sup>2</sup></b>	<b>\$1,758.54</b>	<b>\$3,072.30</b>	<b>\$1,313.77</b>	<b>57.2%</b>
<b>Notes:</b> 1. All values are in millions of 2014 dollars. 2. Total does not reflect total for all retail—only those retail categories included in Shoppers' Goods, Grocery Stores, and Eating and Drinking Establishments. Retail establishments not included in this total are: Convenience Goods other than Grocery Stores, Auto-Related Businesses, Building Materials and Garden Supply, and Non-Store Retailers. Entertainment uses are also not included.				
<b>Sources:</b> ESRI, Inc.; AKRF, Inc.				

*STEP SIX:*

*Assess factors that will affect conditions in the Primary Trade Area in the build year even absent the proposed project. Such factors typically include population changes, which could increase expenditure potential and generate additional demand for retail goods, and new retail projects, which would expand the retail inventory.*

Capture rate analyses use information on known residential and retail projects to quantify new retail sales and household demand in a trade area. These changes are layered onto the existing conditions to determine changes in capture rates between the existing conditions and the future without the proposed project. Sales and household demand from the proposed project are then added to estimate capture rates in the future with the proposed project.

There are several large retail and residential development projects expected to be built in the Primary Trade Area by the 2017 build year. The Waterfront Commons project will add an estimated 419,890 sf of retail use, including 310,535 sf of retail outlet stores to the West Shore. The St. George Waterfront Redevelopment will add approximately 376,000 square feet of retail to a site just north of the Staten Island Ferry St. George Terminal, including an approximately 340,000-sf retail outlet center. While it is expected that the outlet center would draw a portion of its sales from residents living outside of the Primary Trade Area, the capture rate analysis conservatively attributes all projected sales to residents within the Primary Trade Area. The Charleston Mixed-Use Development will add approximately 195,000 sf of medium- and large-format retail as well as 90,000 sf of neighborhood retail. These and other planned developments will also add an estimated 1,790 residential units to the Primary Trade Area by 2017. In addition, by 2019 there is a potential retail development project that would be located on South Avenue near Forest Avenue. This is a developing project and therefore it is not accounted for in the capture rate analysis presented in this Draft Final EIS; however, by the time the Final EIS is complete, this information may need to be updated.

As shown in **Table 3-5**, these planned developments will increase the total capture rate for all of the retail categories analyzed, as well as for each retail category. The total capture rate for retail categories analyzed would increase by 14.3 percentage points, with the highest increase in the shoppers’ goods category (18.4 percentage points), and the lowest increase in the department stores category (3.1 percentage points).

**Table 3-5**  
**Household Retail Expenditures and Total Retail Sales, Primary Trade Area, Future No Action Condition<sup>1</sup>**

Retail Category	Retail Sales in Primary Trade Area	Retail Demand from Primary Trade Area Households	Amount Not Being Captured in Primary Trade Area	Primary Trade Area Capture Rate
Shoppers’ Goods	\$1,276.24	\$1,597.40	\$321.16	79.9%
<i>Department Stores</i>	<i>\$145.64</i>	<i>\$274.53</i>	<i>\$128.89</i>	<i>53.0%</i>
Grocery Stores	\$549.11	\$898.45	\$349.34	61.1%
Eating and Drinking Establishments	\$395.57	\$609.78	\$214.22	64.9%
<b>Total<sup>2</sup></b>	<b>\$2,220.92</b>	<b>\$3,105.63</b>	<b>\$884.71</b>	<b>71.5%</b>
<b>Notes:</b> 1. All values are in millions of 2014 dollars. 2. Total does not reflect total for all retail—only those retail categories included in Shoppers’ Goods, Grocery Stores, and Eating and Drinking Establishments. Retail establishments not included in this total are: Convenience Goods other than Grocery Stores, Auto-Related Businesses, Building Materials and Garden Supply, and Non-Store Retailers. Entertainment uses are also not included.				
<b>Sources:</b> ESRI, Inc.; ICSC; Urban Land Institute’s 2008 <i>Dollars and Cents of Shopping Centers</i> , AKRF, Inc.				

*STEP SEVEN:*

***Project the sales volume for the proposed project’s retail uses.***

As described above under Step One, the proposed project would introduce approximately 426,576 gross square feet (gsf), including local and destination retail uses and cinema space. The retail space that would be added by the proposed project includes shopper’s goods, a grocery store, and eating and drinking establishments. **Table 3-6** shows the breakdown of retail and the projected sales assumed under this analysis. As shown in **Table 3-6**, retail sales resulting from the proposed project are projected to be approximately \$137.29 million annually.

**Table 3-6**  
**Estimated Sales at Stores Introduced Under the Proposed Project**

Retail Category	Square Feet	Estimated Sales (Millions of 2014 Dollars)
<b>Shoppers' Goods</b>	<b>204,215</b>	<b>\$64.84</b>
Non-department Store Retail	80,061	\$37.54
Conversion of Existing Loading Docks to Retail	7,946	\$5.72
<b>Department Stores</b>	<b>116,208</b>	<b>\$21.58</b>
Department Store Retail	41,208	\$7.40
Macy's Enlargement	75,000	\$14.18
<b>Grocery Stores</b>	<b>50,000</b>	<b>\$37.91</b>
<b>Eating and Drinking Establishments</b>	<b>44,496</b>	<b>\$34.55</b>
Restaurant	33,665	\$21.86
Food Court	10,831	\$12.69
<b>Total<sup>1,2</sup></b>	<b>298,711</b>	<b>\$137.29</b>
<p><b>Notes:</b> 1. In addition to the uses listed above, the proposed project is anticipated to include a 54,488-gsf cinema. Sales from the cinema were not included in this analysis. 2. Total does not reflect total for all retail—only those retail categories included in Shoppers' Goods, Grocery Stores, and Eating and Drinking Establishments. Retail establishments not included in this total are: Convenience Goods other than Grocery Stores, Auto-Related Businesses, Building Materials and Garden Supply, and Non-Store Retailers. Entertainment uses are also not included.</p> <p><b>Sources:</b> Total retail square footage provided by S9 Architects and General Growth Properties. Sales for Macy's Enlargement estimated based on sales reported in "Connecting With Every Customer: Macy's, Inc. Fact Book 2013." All other sales were estimated based on data from ICSC Sales Productivity for Non-Anchor Tenants in New York Metro Area Malls for March 2014, and the Urban Land Institute's 2008 <i>Dollars and Cents of Shopping Centers</i>.</p>		

The proposed project would not introduce any residential uses, and therefore the residential expenditure potential in the Primary Trade Area would not change as a result of the proposed project.

*STEP EIGHT:*

***Develop a capture rate for the Primary Trade Area in the future with the proposed project. According to the CEQR Technical Manual, if the capture rate for relevant categories of goods would exceed 100 percent, it may have the potential to saturate the market for particular retail goods and a detailed assessment is warranted.***

As described above under Step Seven, the proposed project would increase retail sales in the Primary Trade Area by an estimated \$137.29 million annually, and would not change household retail expenditure potential. **Table 3-7** compares Primary Trade Area retail sales, demand, and capture rates for existing conditions with those for the future with the proposed project.

As shown in the table, the total retail capture rate would increase 4.4 percentage points, from 71.5 percent to 75.9 percent in the future with the proposed project. The capture rate for shoppers' goods would increase by 4.1 percentage points to 84.0 percent, and the capture rate for department stores would increase by 7.9 percentage points to 60.9 percent. The capture rate for

eating and drinking establishments would increase by 5.7 percentage points to 70.5 percent, and the capture rate for grocery stores would increase by 4.2 percentage points to 65.3 percent.

**Table 3-7**

**Comparison of Estimated Retail Capture Rates in the Primary Trade Area:  
Existing, No Action, and With Action Conditions**

	Retail Sales in Primary Trade Area <sup>1</sup>	Retail Demand from Primary Trade Area Households <sup>1</sup>	Primary Trade Area Capture Rate
<b>Existing Conditions</b>			
Shoppers' Goods	\$971.48	\$1,580.26	61.5%
<i>Department Stores</i>	\$135.78	\$271.59	50.0%
Grocery Stores	\$480.60	\$888.81	54.1%
Eating and Drinking	\$306.46	\$603.24	50.8%
<b>Total<sup>2</sup></b>	<b>\$1,758.54</b>	<b>\$3,072.30</b>	<b>57.2%</b>
<b>Future Without the Proposed Project</b>			
Shoppers' Goods	\$1,276.24	\$1,597.40	79.9%
<i>Department Stores</i>	\$145.64	\$274.53	53.0%
Grocery Stores	\$549.11	\$898.45	61.1%
Eating and Drinking	\$395.57	\$609.78	64.9%
<b>Total<sup>2</sup></b>	<b>\$2,220.92</b>	<b>\$3,105.63</b>	<b>71.5%</b>
<b>2015 With the Proposed Project</b>			
Shoppers' Goods	\$1,341.08	\$1,597.40	84.0%
<i>Department Stores</i>	\$167.22	\$274.53	60.9%
Grocery Stores	\$587.02	\$898.45	65.3%
Eating and Drinking	\$430.11	\$609.78	70.5%
<b>Total<sup>2</sup></b>	<b>\$2,358.21</b>	<b>\$3,105.63</b>	<b>75.9%</b>
<p><b>Notes:</b> 1. All dollar values are in millions of 2014 dollars.                  2. Total does not reflect total for all retail—only those retail categories included in Shoppers' Goods, Grocery Stores, and Eating and Drinking Establishments. Retail establishments not included in this total are: Convenience Goods other than Grocery Stores, Auto-Related Businesses, Building Materials and Garden Supply, and Non-Store Retailers. Entertainment uses are also not included.</p> <p><b>Sources:</b> ESRI, Inc.; AKRF, Inc. Sales for Macy's Enlargement estimated based on sales reported in "Connecting With Every Customer: Macy's, Inc. Fact Book 2013." All other sales were estimated based on data from ICSC Sales Productivity for Non-Anchor Tenants in New York Metro Area Malls for March 2014, and the Urban Land Institute's <i>2008 Dollars and Cents of Shopping Centers</i>.</p>			

In the future with the proposed project, capture rates for each of the broad retail categories analyzed would remain below 100 percent. As described above, capture rates are not an exact measure of retail sales and expenditure potential in any area, and this analysis has focused by necessity on the household expenditure potential component of retail demand, not quantifying additional demand from other sources such as workers, tourists and other visitors, or internet sales. Despite these uncertainties, 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.



*CONCLUSION*

As described above, 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. Therefore, it is not expected that the proposed project would lead to vacancies and disinvestment on neighborhood commercial streets, nor would it affect land use patterns and the economic viability of the neighborhood.

**ADVERSE EFFECTS ON SPECIFIC INDUSTRIES**

According to the *CEQR Technical Manual*, a project may result in a significant adverse impact if it would measurably diminish the viability of a specific industry that has substantial economic value to the city's economy. An example as cited in the *CEQR Technical Manual* would be new regulations that prohibit or restrict the use of certain processes that are critical to certain industries. Following *CEQR Technical Manual* guidelines, the analysis of effects on specific industries considers the following issues (numbered in italics below) to determine the potential for significant adverse impacts.

***1. Would the proposed project significantly affect business conditions in any industry or any category of business within or outside the study area?***

The proposed project would not directly displace any businesses, nor is it expected to result in any indirect business displacement due to increased rents or retail market saturation. While some limited indirect business displacement due to increased rents and retail market saturation cannot be ruled out, the businesses that could potentially be displaced do not represent a critical mass of businesses within any City industry or category of business. The proposed project would add to an existing, established concentration of retail that draws a customer base from beyond the ½-mile study area. Although these businesses are valuable individually and collectively to the City's economy, the goods and services offered by any potentially displaced uses are concentrated throughout the ½-mile study area, and can be found elsewhere on Staten Island and in New York City. Therefore, the proposed project would not affect business condition in any specific industry.

***2. Would the proposed project indirectly substantially reduce employment or impair the economic viability in the industry or category of businesses?***

As described above, 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. Therefore, the proposed project would not affect the economic viability or substantially reduce employment in any industry or category of business.

*CONCLUSION*

Based on this preliminary assessment, the proposed project would not have the potential to have a significant adverse impact on specific industries within the study area.

#### **D. FUTURE WITH 2019 COMPLETION DATE**

As detailed in Chapter 1, “Project Description,” 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 be expected to be complete by 2019, rather than by 2017. In this event, the effects of the proposed project on socioeconomic conditions would be substantially similar to those described above for the 2017 full-build analysis. The delay in the completion of the Macy’s enlargement and a portion of the parking garage would have no effect with regards to direct residential or business displacement, or indirect residential displacement.

The postponement of the completion of the Macy’s enlargement would have little effect on the proposed project’s potential to result in indirect business displacement. There are no additional background development projects that are currently expected to be built in the ½-mile study area between 2017 and 2019. The delay would not change the overall amount of retail added by the proposed project, but would distribute the effects of the proposed project over a slightly longer time frame. As described above, the ½-mile study area already has a well-established retail market anchored by the existing Mall, including the existing Macy’s store. Even with a delay in completion of the Macy’s enlargement, 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.

There are no known major retail projects planned within the proposed project’s Primary Trade Area (i.e., Staten Island) between 2017 and 2019. Therefore, capture rates under this 2019 Full-Build Scenario would be the same as projected for the 2017 full-build analysis presented above, or possibly less when considering additional consumer expenditure potential created by additional background residential growth. Therefore, the completion of the proposed project by 2019, rather than by 2017, would not result in any significant adverse impacts to socioeconomic conditions. \*