

Staten Island Mall Enlargement Draft Final Scope of Work for Preparation of a Draft Environmental Impact Statement

This document is the Final Scope of Work for the Staten Island Mall Enlargement Draft Environmental Impact Statement (DEIS). This Final Scope of Work has been prepared to describe the proposed project, present the proposed framework for the EIS analysis, and discuss the procedures to be followed in the preparation of the DEIS.

A Draft Scope of Work was prepared in accordance with the State Environmental Quality Review Act (SEQRA), City Environmental Quality Review (CEQR) procedures and the city's *CEQR Technical Manual* and was distributed for public review. A public scoping meeting was held on July 24, 2014 at 10:00 am at the Department of City Planning, 22 Reade Street, New York, NY. The period for comments on the Draft Scope of Work remained open until the close of business on August 4, 2014, at which point the scope review process was closed. There were no public comments on the Draft Scope of Work at the scoping meeting, nor were written comments received during the comment period; therefore, this Final Scope of Work does not include a "Response to Comments" section. Subsequent to the close of the comment period, the lead agency oversaw preparation of this Final Scope of Work. The DEIS will be prepared in accordance with this Final Scope of Work.

This Final Scope of Work incorporates changes in response to project updates that were made subsequent to publication of the Draft Scope of Work. The substantive changes to the proposed project and impact assessment methodologies since the Draft Scope of Work was issued are as follows:

- A reduction in the total size of the proposed enlargement, from a total of 444,835 gross square feet (gsf) of retail to 426,576 gsf, as well as adjustments to the gsf of certain retail use components of the proposed project (see **Table 1**).
- Adjustment of the analysis year for certain environmental analyses to account for 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 structured parking garage would not be expected to be complete until 2019, rather than 2017.
- A reduction in the amount of new parking spaces that would be available within the proposed parking garage, from 1,500 spaces to 1,413 spaces.

Revisions to the Draft Scope have been incorporated into the Final Scope and are indicated by double-underlining new text and striking deleted text.

A. INTRODUCTION

This ~~Draft~~ Final Scope of Work outlines the technical areas to be analyzed in the preparation of an Environmental Impact Statement (EIS) for the proposed enlargement of the Staten Island Mall (the proposed project). The proposed project is located at 2655 Richmond Avenue (Block 2400, Lots 7, 118, 180, 210, and 220) in the Heartland Village neighborhood of Staten Island Community District 2 (see **Figure 1**). The 84.95-acre project site is located in a C4-1 zoning district and is bounded by Richmond Hill Road, Marsh Avenue, Platinum Avenue, and Richmond Avenue.

The ~~co-applicants~~, GGP Staten Island Mall, LLC, Macy's Retail Holdings, Inc. (Macy's) and J.C. Penney Corporation, Inc. (collectively, the Applicants) ~~is are~~ seeking a zoning authorization 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 Section 36-592. The proposed actions would facilitate a proposal by the Applicants to enlarge an existing commercial center known as the Staten Island Mall (the Mall) with the development of approximately ~~444,835~~ 426,576 gross square feet (gsf), including ~~321,998~~ 298,711 gsf of local and destination retail uses (Use Group 6 or 10, depending on the retail use and size of establishment) and ~~53,514~~ 54,488 gsf of Use Group 8 cinema uses (see proposed site plan in **Figures 2a and 2b**). The Applicants intends the additional space 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.

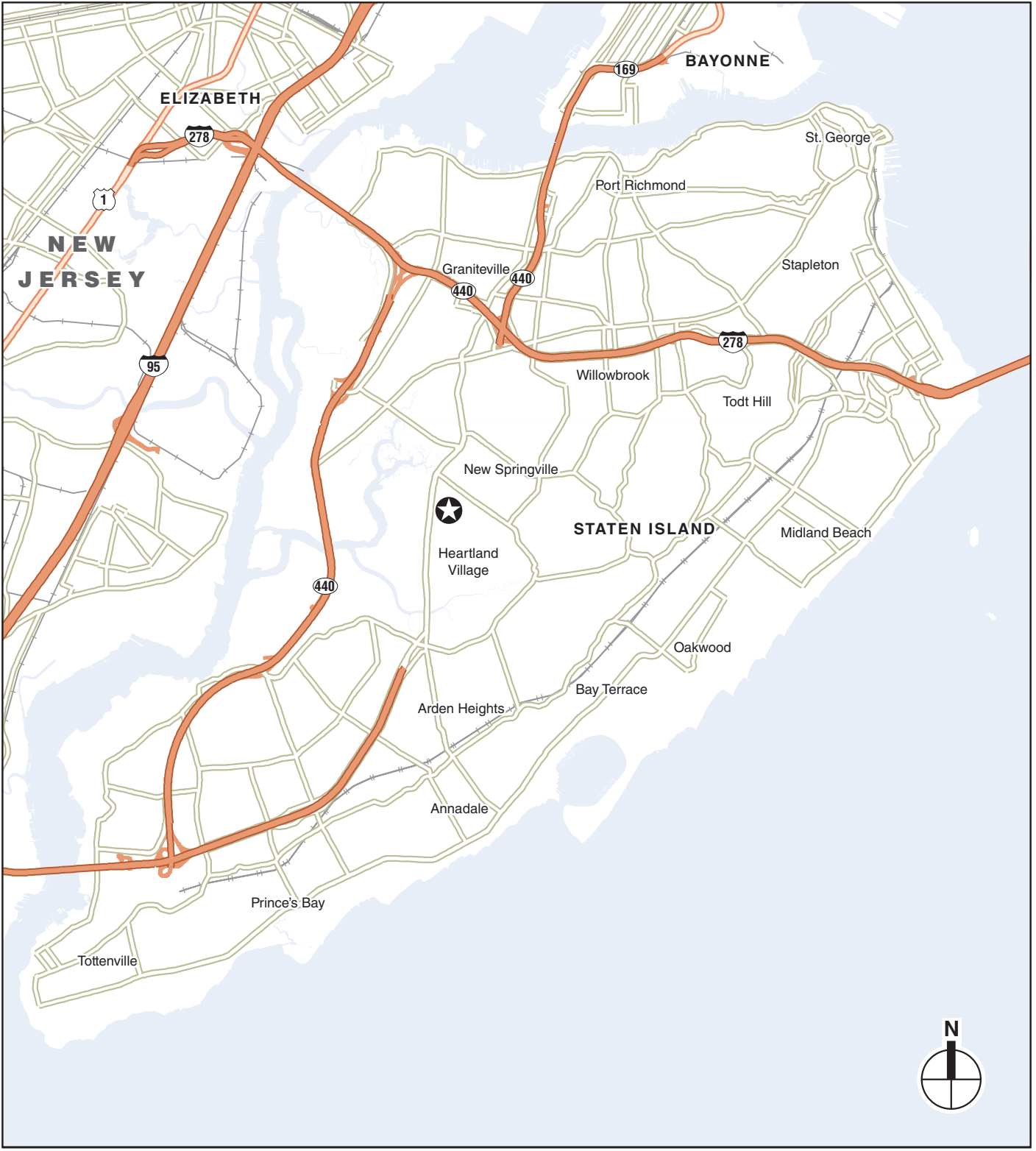
In conjunction with the retail enlargement, the proposed project includes the development of a new parking structure, as well as exterior landscape improvements. As described in more detail below, the overall number of parking spaces provided on the project site would decrease from an existing 5,844 spaces to the proposed ~~5,563~~ 5,477 spaces.¹ The proposed actions would facilitate the Applicants's 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 structured parking garage would not be expected to be complete until 2019 (the "2019 Full-Build Scenario").² As detailed in Section C, "Build Year," the EIS analyses will evaluate the most conservative build scenario in determining the potential for significant adverse environmental impacts.

The preparation of this EIS ~~Draft~~ Final Scope of Work will ensure that the potential environmental impacts of the proposed project are fully identified and studied, consistent with environmental law and regulations. Under those laws, public review of the proposed project will not begin until the lead agency has determined that the environmental issues have been

¹ The numbers of existing and proposed parking spaces (5,844 and ~~5,563~~ 5,477, respectively) do not include 64 spaces that straddle the project site and adjacent Sears zoning lot.

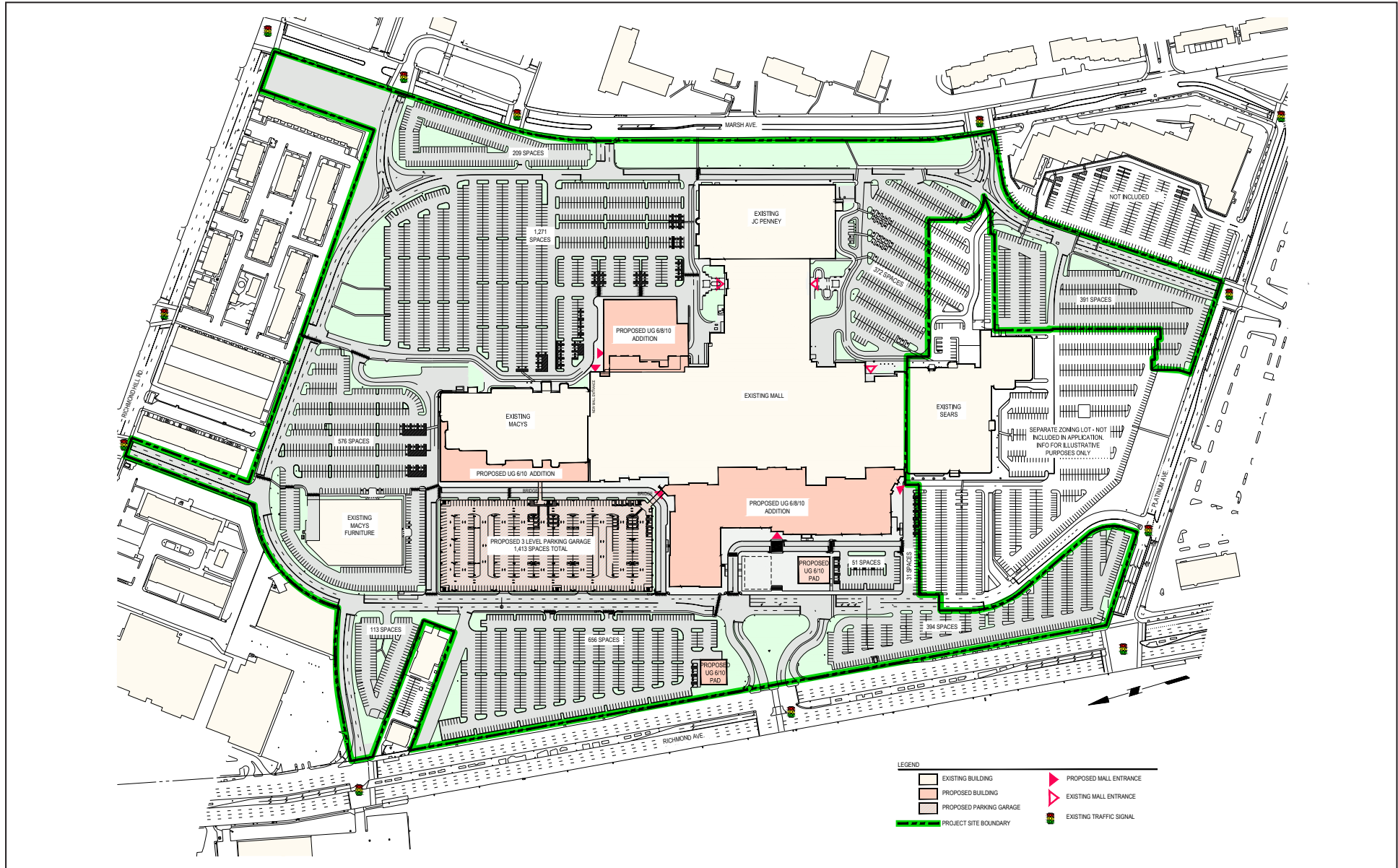
² Under the 2019 Full-Build Scenario, the project site would contain 5,235 spaces by 2017 and 5,477 spaces upon completion of the Macy's enlargement by 2019.

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adequately studied in the form of a Draft EIS (DEIS), in order to permit meaningful review by the public and decision makers. This document provides a description of the proposed project and includes task categories for all technical areas to be analyzed in the DEIS.

B. PROJECT DESCRIPTION

ACTIONS NECESSARY TO FACILITATE THE PROPOSAL

The Applicants ~~is~~ are seeking a zoning authorization pursuant to the ZR Section 36-023 for:

- A reduction by up to 47.5 percent of the 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 Sections 36-58 and/or 37-90.

In addition, the Applicants ~~is~~ are seeking ~~a~~ cross-access easement certifications pursuant to: Section 36-592 to certify that cross-access connections have been provided (for locations where they are required); and pursuant to 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, ~~which is a~~ 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 anticipates that ~~it~~ they will apply to BSA to modify, via Special Order Calendar or by letter, the plans accompanying those previously-granted variance(s).

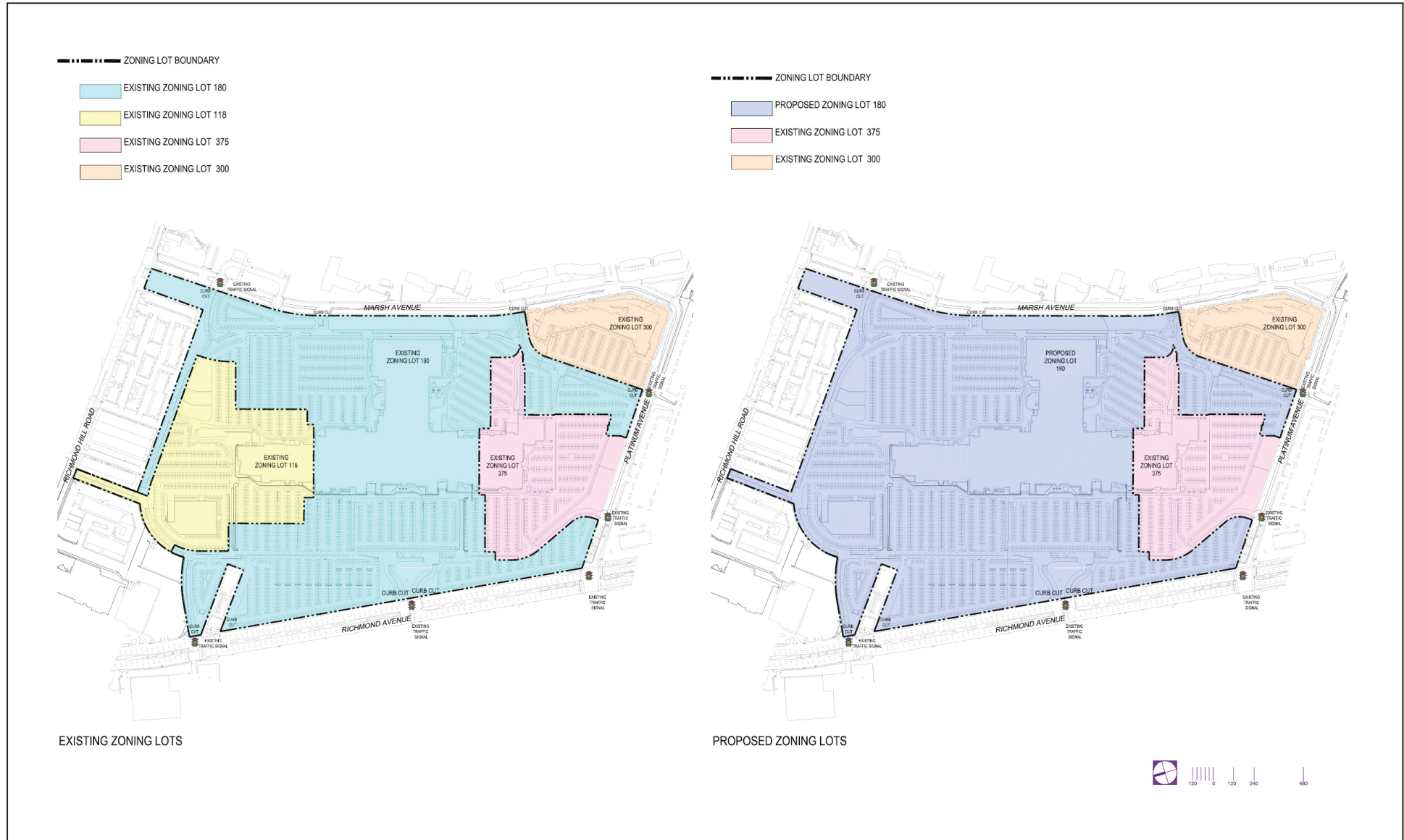
Currently, two adjacent zoning lots that comprise the project site (one is tax lot 118 and the other is comprised of tax lots 7, 180, 210 and 220) are anticipated to be merged into a single zoning lot to facilitate the proposed project.¹

DESCRIPTION OF THE PROPOSED PROJECT SITE

The Mall is a regional shopping center consisting of retail stores arranged as a mall with three department stores on the north (Macy's), south (Sears), and east sides (J.C. Penney) of the Mall. As shown on **Figure 3**, the Mall is currently comprised of three zoning lots:

- The Macy's zoning lot (tax lot 118), which includes the Macy's department store, Macy's furniture store, and adjacent parking fields;
- The Mall/J.C. Penney zoning lot (tax lots 7, 180, 210, 220), which includes the retail stores comprising the mall itself, the J.C. Penney 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.

¹ As detailed under "Description of the Proposed Project Site," the proposed project site does not include the zoning lot containing the 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.



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single authorization to approve a single site plan with a reduction in the combined parking requirement for the Macy’s and Mall/J.C. Penney 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 its own discretionary approvals; accordingly, it is not included as part of the project site.

The project site (Staten Island Block 2400, Lots 7, 118, 180, 210, and 220) 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.

DESCRIPTION OF THE PROPOSED DEVELOPMENT

RETAIL PROGRAM

Approval of the proposed actions would facilitate the development of an approximately 444,835,426,576-gsf enlargement of the Mall on areas currently used for accessory parking.[†] Uses within the expanded areas are intended to include: ~~112,689,88,007~~ gsf of non-department store retail; ~~40,067,41,208~~ gsf of department store retail, ~~34,079,33,665~~ gsf of restaurants; ~~10,163,10,831~~ gsf of new food court; a 50,000-gsf supermarket; a ~~53,514,54,488~~-gsf cinema; a 75,000-gsf enlargement of the existing Macy’s department store; and ~~69,323,73,377~~ gsf of common, service and receiving areas. **Table 1** presents the size of each retail use component of the development program.

**Table 1
Proposed Development Program**

Use	ZR Use Group ¹	Floor Area (GSF)
Non-department Store Retail	6	93,322,80,061
Department Store Retail	10	40,067,41,208
Restaurant	6	34,079,33,665
Food Court	6	10,163,10,831
Macy’s Enlargement	10	75,000
Conversion of Common Mall Space Existing Loading Docks to Retail	6	19,367,946
Common, Service, and Receiving Areas	6/10	69,323,73,377
Supermarket	6	50,000
Cinema	8	53,514,54,488
Total:		444,835,426,576
Notes:	¹ Retail establishments could fall into Use Groups 6 or 10; the most common use group is indicated. ² Ratios used are 1:150 sf retail, 1:100 sf supermarket, 1:4 cinema seats. For the purposes of this preliminary parking requirement calculation, no deductions from GSF to ZSF were assumed and common/service/receiving areas were treated as general retail space.	
Sources:	S9 Architects and GGP Staten Island Mall LLC	

[†] Approximately 19,367 gsf of the proposed enlargement would involve converting common mall space, currently not calculated a parking in the BSA documents, to non department store retail. Occurring on the first and second floor, these existing uses constitute leasable in line (non department store) retail and restaurant spaces classified as Use Group 6. The converted spaces are at the existing loading dock, common mall space, and the foot court seating area. The 19,367 gsf is noted as an addition in **Table 1**.

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

PARKING

As noted above, the project site is located within a C4-1 zoning district. According to Section 36-21 of the Zoning Resolution, C4-1 zoning districts require one accessory parking space for every 150 sf of floor area for retail/service uses. For other uses, one parking space must be provided for: every 100 sf of floor area for supermarket uses; every 4 cinema seats; and for every 400 sf of floor area for furniture store uses. For the existing development on the project site and the proposed development, which does not include the Sears zoning lot, a total of ~~910,438~~ parking spaces would be required at these ratios.¹

To accommodate the development of the proposed project, approximately ~~1,781~~ 1,780 existing surface parking spaces on the project site would be displaced. These spaces would be replaced by a new structured garage with a capacity of ~~1,500~~ 1,413 parking spaces. Thus, the proposed project would result in a net decrease of ~~284~~ 367 parking spaces, as the overall number of parking spaces provided on the project site would decrease from 5,844 to ~~5,563~~ 5,477. These ~~5,563~~ 5,477 provided spaces would be approximately 47.5 percent fewer than the ~~10,384~~ 10,438 spaces required by Section 36-21, thus an approximately 47.5 percent reduction in required spaces is requested by the Applicants.

LANDSCAPE PLAN

The proposed project would include landscape improvements throughout the project's site surface parking areas, including planting approximately ~~460~~ 585 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.

¹ 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 ~~preliminary~~ parking requirement calculation in this ~~memorandum document and subsequent EIS analyses~~, no deductions from GSF to ZSF ~~were~~ are assumed and common/service/receiving areas ~~were~~ are treated as general retail space.

C. BUILD YEAR

Assuming commencement of construction in 2015, and an estimated 27-month, single-phase construction period for the proposed enlargement, the proposed project is expected to be complete and occupied by 2017. However, 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 27-month period described above).¹ 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.

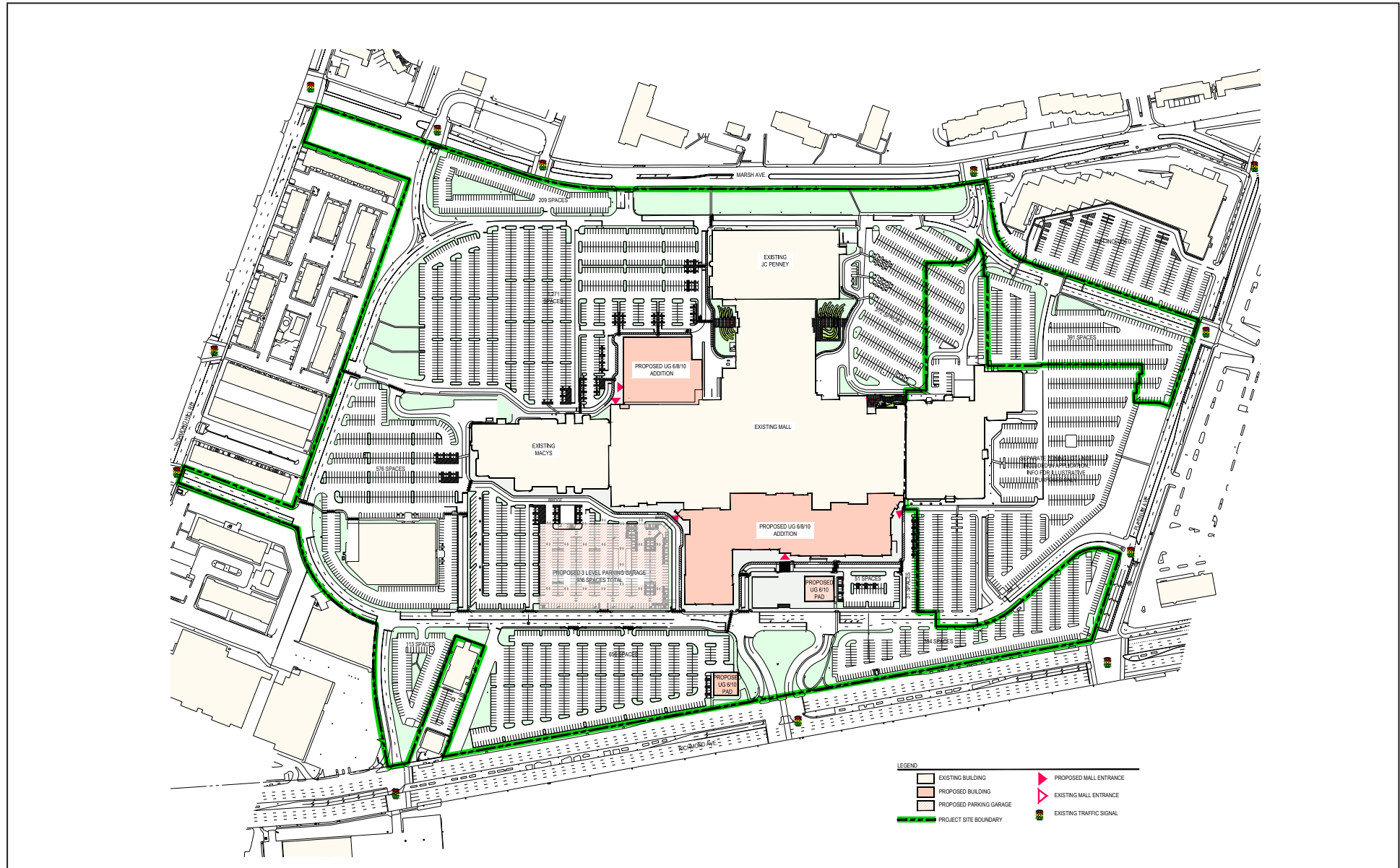
For the purposes of analyzing the Reasonable Worst Case Development Scenario (RWCDS), for a majority of analyses a future full build year of 2017 will be examined to assess the potential impacts of the proposed project; the RWCDS for these analyses will assume that the entire proposed project—including the Macy's enlargement—is complete and occupied by 2017. Each analysis that assumes a 2017 full-build condition also will include 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 will evaluate the 2019 Full-Build Scenario, because additional background growth between 2017 and 2019 could contribute to additional potential significant adverse impacts not identified when analyzing a 2017 full-build condition. If significant adverse transportation impacts are 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 will consider whether a 2017 full-build condition could result in potential significant adverse impacts greater than those identified in the 2019 analysis.

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 far below the maximum allowable floor area ratio (FAR). While additional structured parking could be provided, provision of structured parking in addition to that currently proposed would not be economically feasible for the Applicants, due to its prohibitive cost. Furthermore, the proposed enlargement would trigger the need for authorization approval, regardless of parking requirements. The project would occur on

¹ Figure 4 illustrates the 2017 site plan assuming a lag 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 4

underutilized land within an existing concentration of retail uses. Currently, despite the commercial success of the Mall, the Applicants believes that the surface parking lots surrounding the mall are underutilized.

The proposed project would expand an existing commercial center, and would therefore not require major new infrastructure. The site is accessible to major roadways, including Richmond Avenue, and is in close proximity to the West Shore Expressway. It is also located near central Staten Island's numerous residential neighborhoods.

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

E. 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 an authorization pursuant to Zoning Resolution 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 future without the proposed actions conditions on the project site are expected to remain unchanged from existing conditions.

F. WITH ACTION SCENARIO

The proposed actions would facilitate the Applicants's 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 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. For instance, the proposed supermarket (UG-6) shown on the site plan in the back of the Mall could be sited within one of the proposed footprints in the front of the Mall.

In order to provide a conservative environmental review, a Reasonable Worst-Case Development Scenario for the With-Action scenario was developed based on the Applicants's current intended development program and typical retail uses in similar developments that generate a high number of vehicle trips. These specific retail types include: ~~34,079~~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 ~~53,514~~54,488 gsf of cinema space (UG-8). The Applicants ~~has~~have identified a demand for a supermarket and a cinema on the site, as well as additional shopping center uses. The Applicants believes 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 believes it would provide a complimentary use to the shopping center. The proposed development is broken down by Use Group, GSF, and parking

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requirements in **Table 1** and shown on the proposed site plan (**Figures 2a and 2b**). Overall, the proposed mix of uses provides a reasonable and conservative basis for environmental analysis.

With the ~~444,835~~426,576 gsf of new uses that are expected to be added as a result of the proposed project, the project site would contain approximately ~~1,673,649~~1,655,390 gsf of retail uses. The worker population of the project site would increase by approximately ~~1,000~~943 in the With Action scenario, to approximately ~~3,750~~3,693 employees (see **Table 5**).

The project site currently has 5,844 surface parking spaces. To accommodate the development of the proposed project, approximately ~~1,781~~1,780 existing surface parking spaces on the project site would be displaced. These spaces would be replaced by a new structured garage with a capacity of ~~1,500~~1,413 parking spaces. Thus, the proposed project would result in a net decrease of ~~281~~367 parking spaces, as the overall number of parking spaces provided on the project site would decrease from 5,844 to ~~5,563~~5,477. As noted above, in order to facilitate the proposed project, the Applicants ~~are~~is seeking a zoning authorization to reduce the required parking on the project site by 47.5 percent, since the ~~5,563~~5,477 spaces provided would be approximately 47.5 percent fewer than the ~~10,384~~10,438 spaces that would be required for the existing and proposed uses by Section 36-21.

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.

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**Table 2
Proposed Development Project**

Lot Numbers	GSF Above Grade	GSF Below Grade	Total GSF	Commercial GSF	Community Facility GSF	Residential GSF	Manufacturing GSF	# Residential Units	# of Accessory Parking Spaces	Accessory Parking GSF	Building Height (in feet)
7, 118, 180, 210, and 220	<u>444,835</u> <u>426,576</u>	0	<u>444,835</u> <u>426,576</u>	<u>444,835</u> <u>426,576</u>	0	0	0	0	<u>1,500</u> <u>1,413</u> ¹	<u>565,527</u> <u>542</u> <u>550</u>	Up to 60'

¹ Approximately 1,7811,780 existing surface parking spaces on the project site would be displaced. These spaces would be replaced by a new structured garage with a capacity of 1,5001,413 parking spaces. Thus, the proposed project would result in a net decrease of 281367 parking spaces, as the overall number of parking spaces provided on the project site would decrease from 5,844 to 5,563477.

**Table 3
Proposed No Action Scenario**

Lot Number	GSF Above Grade	GSF Below Grade	Total GSF	Commercial GSF	Community Facility GSF	Residential GSF	Manufacturing GSF	# Residential Units	# Accessory Parking Spaces	Accessory Parking GSF	Building Height (ft.)
7, 118, 180, 210, and 220	1,228,814	0	1,228,814	1,228,814	0	0	0	0	5,844 ¹	1,862,095	Up to 56'

NOTES: Proposed No-Action Scenario is no change from Existing Conditions.
¹ The 5,844 parking spaces do not include 64 spaces that straddle the project site and the Sears zoning lot.

**Table 4
Proposed With Action Scenario**

Lot Number	GSF Above Grade	GSF Below Grade	Total GSF	Commercial GSF	Community Facility GSF	Residential GSF	Manufacturing GSF	# Residential Units	# Accessory Parking Spaces	Accessory Parking GSF	Building Height (ft.)
7, 118, 180, 210, and 220	<u>1,673,649</u> <u>1,655,390</u>	0	<u>1,638,707</u> <u>1,655,390</u>	<u>1,638,707</u> <u>1,655,390</u>	0	0	0	0	<u>5,563</u> <u>5,477</u> ¹	<u>2,427,622</u> <u>2,404,645</u>	Up to 60'

NOTE: ¹ The 5,5635,477 proposed spaces do not include 64 spaces that straddle the project site and the Sears zoning lot.

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Table 5
Staten Island Mall Enlargement RWCDs

	Existing Conditions	No-Action Condition	With-Action Condition	Increment for Analysis
Built Floor Area	1,228,814 gsf	1,228,814 gsf	4,673,649 1,655,390 gsf	444,835 426,576 gsf
Uses	Retail (Use Group 6, 10)	Retail (Use Group 6, 10)	Retail (Use Group 6, 8, 10)	Use Group 6, 8, 10
Worker Population	±2,750	±2,750	±3,750 3,693	±1,000 943 ¹
Notes:	1. 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.			

G. CITY ENVIRONMENTAL QUALITY REVIEW

CEQR OVERVIEW

New York City has formulated an environmental review process, CEQR, pursuant to the State Environmental Quality Review Act (SEQRA) and its implementing regulations (Part 617 of 6 New York Codes, Rules and Regulations). The City's CEQR rules are found in Executive Order 91 of 1977 and subsequent rules and procedures adopted in 1991 (62 Rules of the City of New York, Chapter 5). CEQR's mandate is to assure that governmental agencies undertaking actions within their discretion take a "hard look" at the environmental consequences of each of those actions so that all potential significant environmental impacts of each action are fully disclosed, alternatives that reduce or eliminate such impacts are considered, and appropriate, practicable measures to reduce or eliminate such impacts are adopted.

The CEQR process begins with selection of a "lead agency" for the review. The lead agency is generally the governmental agency which is most responsible for the decisions to be made on a proposed action and which is also capable of conducting the environmental review. For the Staten Island Mall enlargement proposal, the Department of City Planning (DCP) is the CEQR lead agency.

The lead agency, after reviewing the Environmental Assessment Statement (EAS), has determined that these proposed actions have the potential for significant adverse environmental impacts and that an EIS must be prepared. A public scoping of the content and technical analysis of the EIS is the first step in its preparation, as described below. Following completion of scoping, the lead agency oversees preparation of a draft EIS (DEIS) for public review.

The lead agency and the City Planning Commission hold a public hearing during the Commission's period for consideration of the application. That hearing record is held open for 10 days following the open public session, at which time the public review of the DEIS ends. The lead agency then oversees preparation of a final EIS (FEIS), which incorporates all relevant comments made during public review of the DEIS. The FEIS is the document that forms the basis of CEQR Findings, which the lead agency and each involved agency (if applicable) must make before taking any action within its discretion on the proposed action.

SCOPING

The CEQR scoping process is intended to focus the EIS on those issues that are most pertinent to the proposed actions. The process at the same time allows other agencies and the public a voice in framing the scope of the EIS. During the period for scoping those interested in reviewing the draft EIS scope may do so and give their comments in writing to the lead agency or at the public scoping meeting.

A public scoping meeting for the proposed actions was held on July 24, 2014 at 10:00 am at the Department of City Planning, 22 Reade Street, New York, NY. The period for comments on the Draft Scope of Work will remain open until the close of business on August 4, 2014 for 10 days following the meeting, at which point the scope review process will be closed. There were no public comments on the Draft Scope of Work at the scoping meeting, nor were written comments received during the comment period, and as such this Final Scope of Work does not include a "Response to Comments" section. Subsequent to the close of the comment period, the lead agency will then oversee preparation of this Final Scope of Work, which

~~incorporates all relevant comments made on the scope and revises the extent or methodologies of the studies, as appropriate, in response to comments made during scoping. The DEIS will be prepared in accordance with the this Final Scope of Work.~~

H. PROPOSED SCOPE OF THE ENVIRONMENTAL IMPACT STATEMENT

The scope of the EIS ~~will conform~~s to all applicable laws and regulations and ~~will follow~~s the guidance of the March 2014 *CEQR Technical Manual*.

The EIS will contain:

- A description of the proposed actions and their environmental setting;
- A statement of the environmental impacts of the proposed actions, including its short- and long-term effects, and typical associated environmental effects;
- An identification of any adverse environmental effects that cannot be avoided if the proposed actions are implemented;
- A discussion of alternatives to the proposed actions;
- An identification of any irreversible and irretrievable commitments of resources that would be involved in the proposed actions should they be implemented; and
- A description of mitigation measures proposed to minimize adverse environmental impacts.

The analyses for the proposed actions will be performed for the expected year of completion of construction of the proposed project, which is 2017. The EIS will also consider a potential development scenario in which the project is completed by 2017 with the exception of the proposed Macy's enlargement and a portion of the proposed structured parking, which would be completed by 2019. The No Action future baseline condition to be analyzed under "The Future Without the Proposed Action" in all technical chapters will assume that absent the proposed actions, the existing buildings and parking lots on the project site will remain unchanged.

Based on the preliminary screening assessments outlined in the *CEQR Technical Manual* and as described below and in the EAS, the following environmental areas would not require analysis for the proposed project in the EIS: community facilities; shadows; energy; and ~~noise~~ Historic and Cultural Resources. Below is a description of each environmental area in the *CEQR Technical Manual*, and its applicability to the proposed project. Categories to be included in the EIS contain a description of the tasks to be undertaken.

PROJECT DESCRIPTION

The first chapter of the EIS introduces the reader to the action and sets the context in which to assess impacts. The chapter will contain a project identification (brief description and location of the proposed actions); the background and/or history of the actions, a statement of purpose and need for the proposed actions; a detailed description of the proposed actions and development program and project siting and design; and discussion of approvals required, procedures to be followed, and the role of the EIS in the process. The chapter will also describe the analytic framework for the EIS. This chapter is the key to understanding the proposed actions, and gives the public and decision-makers a base from which to evaluate the actions against both No Action and alternative options.

The project description will include a discussion of key project elements, such as site plans and elevations, access and circulation, and other project features. The section on required approvals will describe all public actions required to develop the project. The role, if any, of any other public agency in the approval process will also be described. The role of the EIS as a full disclosure document to aid in decision-making will be identified and its relationship to any other approval procedures will be described.

LAND USE, ZONING, AND PUBLIC POLICY

A land use analysis characterizes the uses and development trends in the area that may be affected by a proposed project. The analysis also considers the project's compliance with and effect on the area's zoning and other applicable public policies. Even when there is little potential for an action to be inconsistent or affect land use, zoning, or public policy, a description of these issues is appropriate to establish conditions and provide information for use in other technical areas.

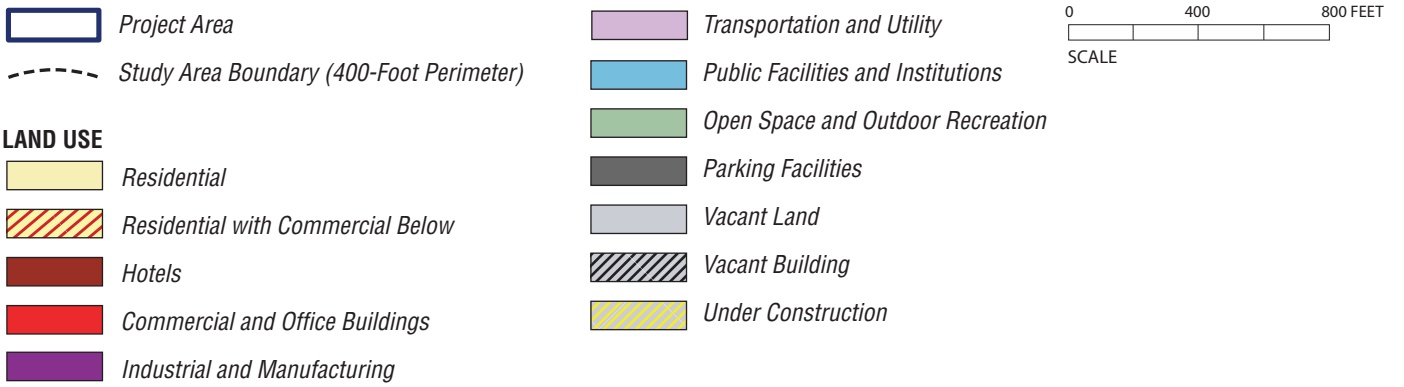
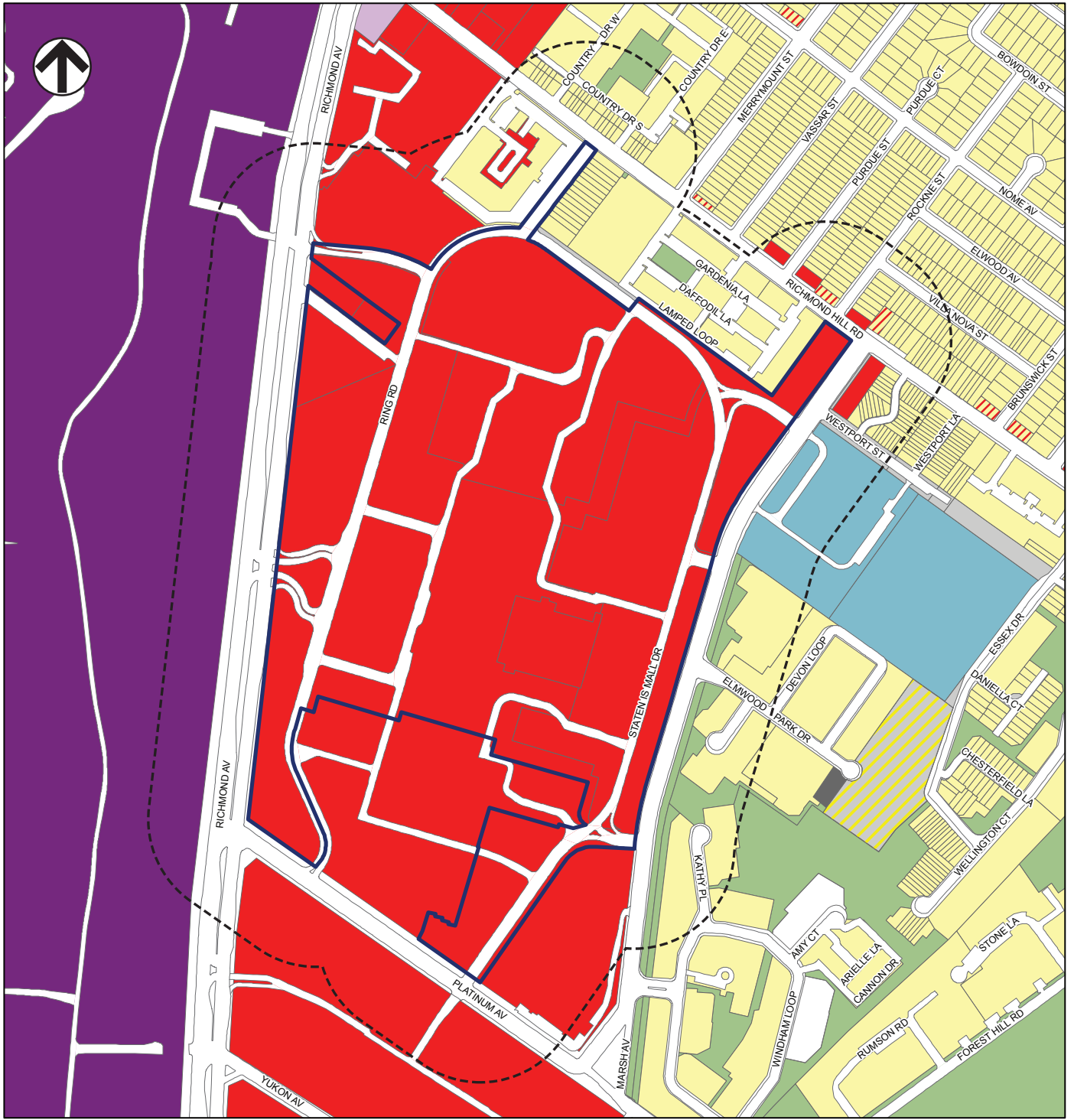
According to the *CEQR Technical Manual*, a detailed assessment of land use is appropriate if an action would result in a significant change in land use or would substantially affect regulation or policies governing land use. The proposed actions would not result in a change in land use; they would result in commercial development within the site of an existing retail center. In addition, the proposed project would not substantially affect regulations or policies governing land use. The proposed project is in conformance with existing zoning regulations for the height, bulk, and design of the development, and would not have the potential to affect any public policies, with the exception of the Waterfront Revitalization Program (WRP). Therefore, a detailed land use, zoning, and public policy analysis is not warranted.

The EIS will include a preliminary assessment of land use and zoning, which includes a basic description of existing and future land uses and zoning. The preliminary assessment will include the project site and a 400-foot study area surrounding the project site, consistent with the guidance of the *CEQR Technical Manual* (see **Figure 45**). The EIS also will include a consistency assessment of the proposed project with the City's WRP policies. This assessment will begin with the completion of the Coastal Assessment Form (CAF), which identifies the WRP policies that are relevant to the proposed project. An explanation of the proposed project's consistency with each noted policy will be provided, which will determine whether the proposed project is supportive, neutral, or detrimental towards the achievement of that policy. Where needed, this assessment will draw upon other technical analyses in the EIS.

SOCIOECONOMIC CONDITIONS

The socioeconomic character of an area includes its population, housing, and economic activity. Although socioeconomic changes may not result in impacts under CEQR, they are disclosed if they 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. This chapter will assess the proposed project's potential effects on the socioeconomic character of the study area.

Socioeconomic impacts can occur when an action directly or indirectly changes economic activities in an area. The purpose of the socioeconomic assessment is to disclose changes that would be created by an action and identify whether they rise to a significant level. The socioeconomic chapter will examine the effects of the proposed actions on socioeconomic conditions on the project sites and in surrounding neighborhoods.



Staten Island Mall Enlargement

According to the *CEQR Technical Manual*, the five principal issues of concern with respect to socioeconomic conditions are whether a proposed project could result in significant impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect (or secondary) residential displacement; (4) indirect business displacement; or (5) adverse effects on a specific industry.

The proposed project and associated reconfiguration of the Mall would not directly displace any residents or businesses, nor would the project introduce residential uses that would require an assessment of potential indirect residential displacement. However, the proposed 444,835,426,576-gsf enlargement exceeds the *CEQR Technical Manual* threshold of 200,000 square feet of commercial development requiring assessment of potential indirect business displacement. Therefore, as detailed below, the EIS will assess whether the proposed project could result in indirect business displacement due to increased rents, or due to retail market saturation (i.e., retail competition).

As described in the *CEQR Technical Manual*, typically the socioeconomic study area boundaries are similar to those of the land use study area and encompass the project site and adjacent area within 400 feet, ¼-mile, or ½-mile, depending on the project size and area characteristics. Some projects may result in direct or indirect effects that are either beyond the half-mile boundary or are such that typical site-specific study areas are not appropriate. The example cited in the *CEQR Technical Manual* is a large retail use that may change shopping patterns in a trade area that extends well beyond the typical half-mile study area. In short, there is no established “area” applicable to all socioeconomic analyses; a study area(s) should be developed that reflects the areas likely to be affected by the project.

Following the *CEQR Technical Manual* guidance described above, the socioeconomic study areas for the proposed project will vary depending on the specific socioeconomic influence and potential reach of the influence. For the assessment of indirect business displacement due to increased rents, the study area will extend approximately ½-mile from the project site, which is the area most likely to experience rent increases as a result of increased consumer visits to the Mall. For the assessment of indirect business displacement due to retail market saturation, the study area will be the primary trade area for the Mall, which is Staten Island in its entirety. The location of the proposed project 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.

INDIRECT BUSINESS DISPLACEMENT DUE TO INCREASED RENTS

The objective of the analysis of indirect business displacement due to increased rents is to determine whether the proposed project may introduce trends that markedly increase property values and rents throughout the study area, making it difficult for some categories of businesses to remain in the area.

The analysis will describe and characterize conditions and trends in employment and businesses within an approximately ½-mile study area using the most recent available data from public and private sources such as New York State Department of Labor, the U.S. Census Bureau, and ESRI, as well as discussions with local real estate brokers as necessary. This information will be used in a preliminary assessment to consider whether the proposed project would:

- Introduce enough of a new economic activity to alter existing economic patterns;
- Add to the concentration of a particular sector of the local economy enough to alter or accelerate existing economic patterns; or
- Indirectly displace residents, workers, or visitors who form the customer base of existing businesses in the area.

If the preliminary assessment cannot rule out the potential for significant adverse impacts due to increased commercial rents, a detailed analysis will be conducted. The detailed analysis would follow the *CEQR Technical Manual* guidelines to determine whether the proposed project would increase property values and thus increase rents for a potentially vulnerable category of businesses and whether relocation opportunities exist for those businesses.

INDIRECT BUSINESS DISPLACEMENT DUE TO RETAIL MARKET SATURATION

Occasionally, development activity may create retail uses that draw substantial sales from existing businesses. While these economic pressures do not necessarily generate environmental concerns, they become an environmental concern when they have the potential to result in increased and prolonged vacancy leading to disinvestment. Such a change may affect the land use patterns and economic viability of the neighborhood. Indirect displacement due to market saturation is rare in New York City, where population density, population growth, and purchasing power are often high enough to sustain increases in retail supply.

Following *CEQR Technical Manual* guidelines, the analysis of indirect business displacement due to retail market saturation starts with a preliminary assessment to determine whether the project may capture the retail sales in a particular category of goods to the extent that the market for such goods would become saturated as a result, potentially resulting in vacancies and disinvestment on neighborhood commercial streets. Specifically, the preliminary assessment will:

- Determine if 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.
- Determine the primary trade area for the proposed anchor store(s)—the largest stores in the proposed development that are expected to be the primary source of added retail sales. The primary trade area is the area from which the bulk of the store’s sales are likely to be derived. As described above, the primary trade area for the proposed project is the borough of Staten Island.
- Through data available from the Census of Retail Trade or other proprietary sources, estimate sales volumes of relevant retail stores within the trade area. Relevant retail stores include those establishments that would be expected to sell categories of goods similar to those sold in anchor stores in the project.
- Through data available from the census and from the U.S. Department of Commerce or other proprietary sources on retail spending, determine the expenditure potential for relevant

Staten Island Mall Enlargement

retail goods of shoppers within the primary trade area. Expenditure potential is the amount that customers in the trade area—typically residents and workers—may be expected to spend on the relevant categories of retail goods.

- Compare sales generated by retail stores to the expenditure profile of the trade area to determine whether the trade area is currently saturated with retail uses or whether there is likely to be an outflow of sales from the trade area. This assessment is based on the percentage of available sales currently derived by existing stores (the capture rate) and the residue of dollars left unspent.
- For the project's 2017 build year, determine whether any factors would emerge, such as other planned retail projects or projected increases in trade area population, that would affect conditions within the trade area by the project's build year.¹
- Project the sales volume for the project's anchor tenant(s). This will be based on the size of the store and on industry standards for sales derived from the Urban Land Institute's *Dollars and Cents of Shopping Centers* or another appropriate source.
- Compare the project's sales volumes with the dollars available within the trade area.

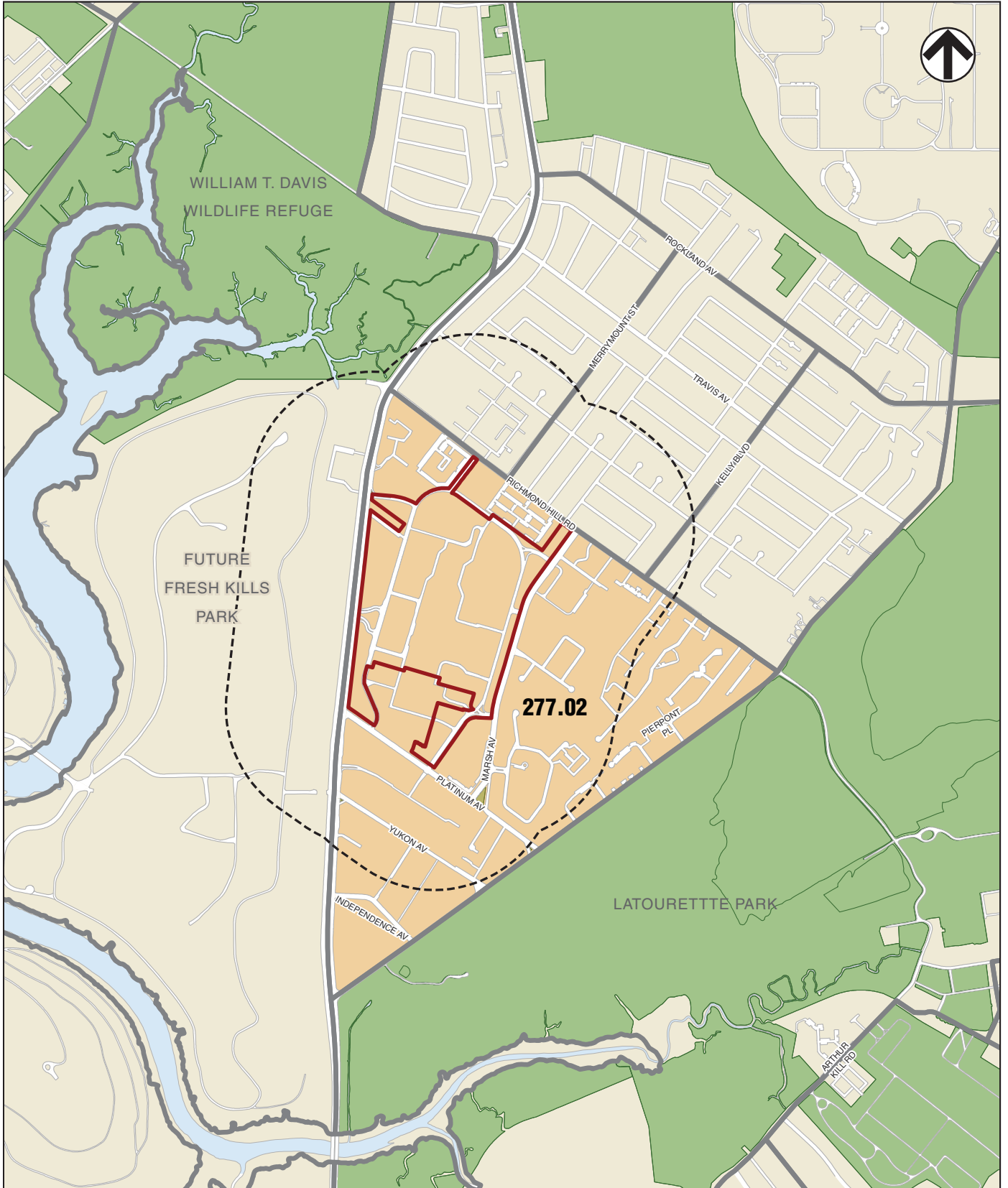
If it has been determined that a socioeconomic impact may be likely or cannot be ruled out based on the preliminary assessment, a detailed analysis is conducted. It is possible that projected capture rates for one or more retail categories would exceed 100 percent within the project's primary trade area, which is the threshold for performing a detailed analysis under CEQR. If projected capture rate(s) exceed 100 percent, a detailed analysis will be performed, per the guidelines of the *CEQR Technical Manual*. The detailed analysis would develop a profile of retail concentrations for potentially affected retail concentrations in trade area to determine whether neighborhood commercial streets could experience increased vacancies that would affect the economic viability of the retail concentrations.

OPEN SPACE

The *CEQR Technical Manual* recommends performing an open space assessment if a project would have a direct effect on an area open space, or an indirect effect through increased population size. The proposed project would not have any direct effect on open space, as there are no publicly accessible open spaces on the project site. Therefore, a direct effects analysis is not warranted.

With respect to potential indirect effects, typically an assessment is conducted if a proposed project's population is greater than 200 residents or 500 employees. The proposed project would not introduce any new residents, but it would introduce more than 500 new employees as well as additional shoppers associated with the new retail uses. Therefore, an analysis of potential open space impacts due to indirect effects is warranted. Consistent with the guidance of the *CEQR Technical Manual*, the study area for the open space assessment would include all census tracts with at least 50 percent of their area within a ¼-mile radius from the project site, as shown on **Figure 56**. The methodology set forth in the *CEQR Technical Manual* also consists of calculating the total non-residential population in the study area, and creating an inventory of publicly accessible open spaces within the study area (if any). The analysis will include a

¹ The analysis also will consider whether any such factors would emerge by 2019, in the event that the proposed enlargement of the Macy's department store is delayed beyond the 2017 build year.



-  Project Area Boundary
-  Quarter-Mile Perimeter
-  Study Area (Richmond County Census Tract 277.02)
-  2010 Census Tract Boundary



projection of conditions in the No Action condition, and assess any impacts associated with the new worker population that would be introduced by the proposed project.

The open space assessment will incorporate any new open spaces that are planned in the study area.

URBAN DESIGN AND VISUAL RESOURCES

According to the *CEQR Technical Manual*, an analysis of urban design and visual resources is warranted when a project would result in a physical alteration, observable to the pedestrian at street level, beyond that allowed by existing zoning.

While the proposed project would comply with the existing zoning regulations related to building height, bulk, and setback requirements, the proposed project requires a zoning authorization to reduce parking requirements on the project site. Given that the proposed project would result in an increase in built floor area beyond what would be allowed “as-of-right” or in the future No Action condition, a preliminary assessment of urban design and visual resources will be provided in the EIS.

Generally, the study area for the preliminary assessment of urban design and visual resources will be consistent with that of the study area for the analysis of land use, zoning and public policy. However, in many cases where significant visual resources exist, it may be appropriate to look beyond the land use study area to encompass views outside of this area. The preliminary assessment will include a concise narrative of the existing project site and surrounding area and descriptions of the Future With Action and No Action conditions; provide existing conditions photographs, aerial view of the project area, building heights and zoning and floor area information/calculations; present Future With Action illustrative drawings such as elevations and sections; and present side-by-side three-dimensional representations showing pedestrian views along the street in the Future No Action and Future With Action scenarios.

If the preliminary assessment shows that changes to the pedestrian environment are sufficiently significant to require greater explanation and further study, then a detailed analysis is appropriate.

NATURAL RESOURCES

According to the *CEQR Technical Manual*, a natural resource is defined as a plant or animal species and any area capable of providing habitat for plant and animal species or capable of functioning to support environmental systems and maintain the City’s environmental balance. Such resources include surface and groundwater, wetlands, dunes and beaches, grasslands, woodlands, landscaped areas, gardens, and build structures used by wildlife. An assessment of natural resources is appropriate if a natural resources exists on or near the site of the proposed action, or if an action involves disturbance of that resource.

Within the proposed mall enlargement area and the remaining portion of the project site, natural resources are limited to landscaped areas (primarily shade trees and grass) located adjacent to the mall and within parking lot islands, as well as the exterior structural habitat provided by the mall. The majority of the proposed mall enlargement area consists of surface parking. Wildlife with the potential to occur within the enlargement area would be extremely limited, and would only include species common to highly developed urban areas within the New York metropolitan area (e.g., house sparrow, rock doves, European starling, gray squirrel). Wildlife using the limited habitats within the proposed mall enlargement area would be expected to find

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similar available habitat nearby within the remaining portions of the project site. Therefore, the loss of this small area of limited habitat would not result in significant adverse impacts to any populations of urban wildlife species using the project area. Furthermore, the proposed project would be expected to result in limited habitats similar to those currently present and would be expected to support wildlife species similar to those currently using the proposed mall enlargement area and remaining portions of the project site. The limited habitat present within the proposed mall enlargement area and surrounding project area do not have the potential to support any state- or federally-listed species or ecological communities¹ and would not, therefore, have the potential to adversely affect these resources. Similarly, because of the developed nature of these areas, other natural resources such as surface waters and wetlands are not present, and soils have already been modified as a result of the original development of the mall.

Land use adjacent to the proposed project site comprises commercial, residential and transportation uses and New York City Department of Parks and Recreation (DPR) parkland within Freshkills Park (2,200 acres). Freshkills Park, separated from the project area by Richmond Avenue, consists of terrestrial habitats developed on and adjacent to the landfill mounds, and a complex of New York State Department of Environmental Conservation (DEC) and US Fish and Wildlife Service National Wetland Inventory (NWI)-mapped tidal wetlands and watercourses including the Arthur Kill, Great Fresh Kill, Little Fresh Kill, Richmond Creek, and Main Creek.² The portion of Freshkills Park adjacent to the proposed mall enlargement area includes stormwater management basins and emergent and forested freshwater wetlands that are not mapped by DEC, and surrounding forest and grassland habitats.³

Wildlife resources present within Freshkills Park are about 600 feet from the proposed mall enlargement area and are separated from this area by existing developed areas consisting of Richmond Avenue and surface parking, and therefore would not have the potential to be adversely affected by the construction or operations of the proposed project. However, stormwater runoff from the Staten Island Mall is conveyed under Richmond Avenue and discharged to the stormwater management basin and emergent and forested freshwater wetland complex within Freshkills Park adjacent to Richmond Avenue.

In accordance with the *CEQR Technical Manual*, the natural resources assessment in the EIS will describe any natural resources present within and adjacent to the project site, and assess the potential for the proposed project to affect these resources, incorporating the results of the Water and Sewer Infrastructure analysis to assess potential impacts to the stormwater

¹ United States Fish and Wildlife Service's (USFWS) Information, Planning, and Conservation (IPAC) IPAC System (Accessed on July 8, 2013. Available at: <http://ecos.fws.gov/ipac/>); New York State Department of Environmental Conservation. Nature Explorer Database (accessed on July 8, 2013; available at <http://www.dec.ny.gov/natureexplorer>); and New York State Department of Environmental Conservation. Environmental Resources Mapper (accessed on July 8, 2013; available at <http://www.dec.ny.gov/imsmaps/ERM/viewer.htm>).

² New York City Department of Parks and Recreation. Final Generic Environmental Impact Statement for Freshkills Park. Prepared by Eloise Hirsh, Fresh Kills Park Administrator New York City Department of Parks and Recreation, Field Operations, Geosyntec Consultants, Arup, HDR | Daniel Frankfurt, Biohabitats Incorporated, and Philip Habib & Associates. March 13, 2009.

³ Ibid.

management/wetland complex within the eastern portion of Freshkills Park adjacent to Richmond Avenue.

HAZARDOUS MATERIALS

This section of the EIS will address the potential presence of hazardous materials, petroleum products, and/or other environmental conditions on the project site. The EIS will summarize the completed Phase 1 Environmental Site Assessments and any Phase 2 Subsurface Site Investigations conducted for the project site, and will include any necessary recommendations for additional testing or other activities that would be required either prior to or during construction and/or operation of the project, including a discussion of any necessary remedial or related measures. The EIS will include a general discussion of the health and safety measures that would be implemented during project construction to protect site workers and the surrounding community. The appropriate remediation measures specific to the proposed end use of the site, including those recommended by the New York City Department of Environmental Protection (DEP) will be provided in the EIS.

WATER AND SEWER INFRASTRUCTURE

The *CEQR Technical Manual* outlines thresholds for analysis of a project's water demand and its generation of wastewater and stormwater. For the proposed project, an analysis of the water supply is not warranted since the proposed project would not result in a demand of more than 1 million gallons per day (gpd)¹ and is not located in an area that experiences low water pressure such as the Rockaway Peninsula or Coney Island. However, an analysis of the proposed project's effects on wastewater and stormwater infrastructure is warranted because the proposed project is located in an area that is partially sewered or currently unsewered. In consultation with DEP, areas of concern specific to wastewater and stormwater infrastructure will be identified, as well as feasible alternatives for storm and sanitary flow drainage and management.

This section of the EIS will include the following:

- The existing sewer system serving the development site will be described based on records obtained from DEP. Records obtained will include sewer network maps and drainage plans. The existing flows to the Waste Water Treatment Plant (WWTP) that serves the site (Oakwood Beach WWTP) will be obtained for the latest 12-month period, and the average dry weather monthly flow will be presented. Existing capacity information for pump stations, regulators, etc. downstream of the affected drainage area will be presented based on available information.
- The existing stormwater drainage system and surfaces (pervious or impervious) on the project site will be described, and the amount of stormwater discharged from the site will be estimated using DEP's volume calculation worksheet.
- Any changes to the site's stormwater drainage system and surface area expected in the future without the proposed project will be described. Any changes to the sewer system that are expected to occur in the future without the proposed project will be described based on information provided by DEP.

¹ Based on water usage rates in Table 13-2 of the *CEQR Technical Manual* the proposed project would use an estimated 182,382 gallons per day.

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- Assess future stormwater generation from the proposed project and assess the project's potential to create impacts. The assessment will discuss any planned sustainability elements and best management practices (BMPs) that are intended to reduce stormwater runoff from the site. Changes to the site's proposed surface area (pervious or impervious) will be described, and runoff coefficients and runoff for each surface type/area will be presented. The volume of stormwater discharge from the project site for different rainfall event scenarios will be calculated based on the DEP Volume Calculation worksheet.
- Sanitary sewage generation from the proposed project will be estimated for the existing condition, no-action condition and the proposed project using sewage generation rates set forth in the *CEQR Technical Manual*. The incremental sewage generated would be compared to the current total sewage demands at the WWTP. If the incremental demand is found to be significant compared to current total demand to the system, the effects will be assessed to determine if there will be any impact on operations of the WWTP and in coordination with DEP.
- Based on the assessment of future stormwater and wastewater generation, the change in flows and volumes to the available City sewers for stormwater discharge and wastewater due to the proposed project will be determined.

SOLID WASTE

A solid waste assessment determines whether a project has the potential to cause a substantial increase in solid waste production that may overburden available waste management capacity or otherwise be inconsistent with the City's Solid Waste Management Plan (SWMP or Plan) or with state policy related to the City's integrated solid waste management system. The City's solid waste system includes waste minimization at the point of generation, collection, treatment, recycling, composting, transfer, processing, energy recovery, and disposal.

According to the *CEQR Technical Manual*, a solid waste assessment is appropriate if a project generates 50 tons per week or more. Based on Citywide solid waste generation rates identified in Table 14-1 of the *CEQR Technical Manual*, the proposed project could generate more than 50 tons per week of solid waste. Therefore, the EIS will include an assessment of solid waste, including the following tasks:

- The existing ownership and operation of the project site's waste collection system will be described.
- The solid waste and service demand generated by the project will be disclosed, based on estimates using Table 14-1 of the *CEQR Technical Manual*.
- The proposed location and method of storage of refuse and recyclables prior to collection will be described.
- The anticipated method of refuse disposal (i.e., private carters or the Department of Sanitation) will be described, including an estimate of the number of additional truck trips.
- Project features that enhance recycling (i.e., those that facilitate the separation, storage, collection, processing, or marketing of recyclables) will be identified.

TRANSPORTATION

The proposed project would generate additional vehicular travel and increase demand for parking, as well as pedestrian traffic and bus riders. These new trips have the potential to affect

the area's transportation systems. A Transportation Planning Factors (TPF) memorandum was prepared and includes a preliminary travel demand forecast and trip assignments for the purposes of identifying potential locations and peak hours for analysis. In accordance with the TPF memo, the transportation studies for the EIS will include the following analyses.

TRAFFIC

The proposed development program exceeds the minimum development density screening thresholds specified in Table 16-1 of the *CEQR Technical Manual*. Therefore, a trip generation forecast is required to determine if the project would generate 50 or more vehicle trips. Based on preliminary analyses conducted by the Applicants, the proposed project is expected to generate more than 50 additional vehicular trips in the weekday midday, and PM peaks hours and Saturday midday and PM peak hours. Therefore, the EIS will provide a detailed traffic analysis focusing on those peak hours and intersections where the highest concentrations of project-generated demand would occur. The EIS traffic analysis will include the following:

- Select peak hours for analysis and define a traffic study area consisting of intersections to be analyzed adjacent to the project site and along major routes leading to and from the site. As shown on **Figure 67**, approximately 37 38 intersections will be analyzed, as listed below.
 1. Richmond Avenue and Forest Avenue
 2. Richmond Avenue and Goethals Road North/Staten Island Expressway
 3. Richmond Avenue and Lamberts Lane/Christopher Lane
 4. Richmond Avenue and Merrill Avenue
 5. Richmond Avenue and Victory Boulevard
 6. Richmond Avenue and Signs Road
 7. Richmond Avenue and Rockland Avenue
 8. Richmond Avenue and Draper Place
 9. Richmond Avenue and Nome Avenue
 10. Richmond Avenue and Richmond Hill Road
 11. Richmond Avenue and the Northwest Entrance to the Staten Island Mall
 12. Richmond Avenue and the West (Main) Entrance to the Staten Island Mall
 13. Richmond Avenue and Platinum Avenue
 14. Richmond Avenue and Forest Hill Road
 15. Richmond Avenue and the Korean War Veterans Parkway
 16. Richmond Avenue and Arthur Kill Road
 17. Richmond Avenue and Barlow Avenue
 18. Richmond Avenue and Katan Avenue
 19. Richmond Hill Road and the North Entrance to the Staten Island Mall
 20. Richmond Hill Road and Marsh Avenue
 21. Richmond Hill Road and Forest Hill Road
 22. Richmond Hill Road, Arthur Kill Road, and Richmond Road
 23. Marsh Avenue and the Northeast Entrance to the Staten Island Mall
 24. Marsh Avenue and the East Entrance to the Staten Island Mall
 25. Marsh Avenue and the Southeast Entrance to the Staten Island Mall
 26. Platinum Avenue and the Southwest Entrance to the Staten Island Mall
 27. Platinum Avenue and the South Entrance to the Staten Island Mall
 28. Platinum Avenue and Marsh Avenue
 29. Platinum Avenue and Forest Hill Road
 30. Arthur Kill Road and Woodrow Road



Proposed Analyzed Intersections
Figure 7

Staten Island Mall Enlargement

31. Arthur Kill Road and the Korean War Veterans Parkway
 32. Arthur Kill Road and Corbin Avenue
 33. Arthur Kill Road and Clarke Avenue
 34. Richmond Road and Wilder Avenue
 35. Victory Boulevard and South Gannon Avenue
 36. Victory Boulevard and North Gannon Avenue
 37. Rockland Avenue and Forest Hill Road
 38. Rockland Avenue and Brielle Avenue
- Conduct a count program for traffic analysis locations that includes a mix of automatic traffic recorder (ATR) machine counts and manual intersection turning movement counts, along with vehicle classification counts and travel time studies (speed runs) as support data for air quality and noise analyses. ATRs will provide 24-hour traffic volumes for a full week (nine days covering two consecutive weekends) at selected arterial locations. Where applicable, available information from recent studies in the vicinity of the study area will be compiled, including data from such agencies as the New York City Department of Transportation (DOT) and DCP.
 - Inventory physical data at each of the analysis intersections, including street widths, number of traffic lanes and lane widths, pavement markings, turn prohibitions, and parking regulations. Signal phasing and timing data for each signalized intersection included in the analysis will be obtained from DOT.
 - Determine existing traffic operating characteristics at each analysis intersection including capacities, volume-to-capacity (v/c) ratios, average vehicle delays, and levels of service (LOS) per traffic movement, per intersection approach, and per overall intersection. The methodology of the 2000 Highway Capacity Manual (HCS+, Version 5.5) will be used for the analysis. Allowances for any on-going construction or temporary road closures will be made.
 - Based on available sources, US Census data and standard references, estimate the travel demand for the future without the proposed project (the No Action condition), which will include the demand from significant development sites planned in the vicinity of the study area by the analysis year. This will include daily and hourly person trips, and a modal distribution to estimate trips by auto, taxi, and other modes. A truck trip generation forecast will also be prepared. Mitigation measures accepted for all No Action projects and other DOT initiatives will be included in the future No Action network.
 - Compute the future 2017-2019 No Action traffic volumes based on an approved background traffic growth rate (1.0 percent per year through 2017 and 0.5 percent per year thereafter) for the study area and any significant development projects expected to be completed in the future without the proposed actions. Incorporate any planned changes to the roadway system anticipated by the ~~project~~ 2019 Build year, and determine the No Action intersection v/c ratios, delays and levels of service.
 - Based on available sources, US Census data, and standard references, develop a travel demand forecast for the proposed development. Assign that volume of general mall traffic and truck traffic in each analysis period to the approach and departure routes likely to be used, and prepare traffic volume networks for the future with the proposed project (With Action) condition for each analyzed peak hour. Determine the resulting v/c ratios, delays, and LOS at analyzed intersections for the 2017-2019 With Action condition.

- Identify the proposed actions' potential to have significant adverse traffic impacts, in accordance with *CEQR Technical Manual* criteria.
- Identify and evaluate traffic mitigation measures, as appropriate, for all significantly impacted locations in the study area, where practicable. This includes potential mitigation for the street system, including possible roadway modifications, new signal installations, signage, signal changes, and parking regulation changes. Development of these measures will be coordinated with DOT and other agencies as necessary. Where impacts cannot be mitigated, they will be described as unavoidable adverse impacts.

PARKING

Parking demand from commercial uses typically peaks in the midday period and declines during the afternoon and evening. The parking analyses will document changes in parking utilization in the No Action and With Action conditions at the project site.

Parking demand from retail and other commercial uses will be derived from the forecasts of daily auto trips from these uses. The forecast of new parking supply will be based on the net change in parking spaces on projected sites, consistent with the RWCDs.

The EIS will provide a parking analysis to determine if the accessory parking to be provided as part of the proposed development is sufficient to accommodate the projected peak demand.

TRANSIT

According to the general thresholds used by the Metropolitan Transportation Authority and specified in the *CEQR Technical Manual*, detailed transit analyses are not required if the proposed actions are expected to result in less than 200 new peak hour subway or bus transit riders. The Staten Island Mall is not located within reasonable walking distance from any rail line and thus it is assumed that no trips to and from the mall will be made by rail.

BUS

Bus routes serving the Staten Island Mall include the S44, S59, S94, and the S79 Select Bus Service along the mall frontage road and the S61, S89, S91, X17, X31, and the weekday only S55 and S56 which run along Marsh and Platinum Avenues. The S44 and S94 buses serve the Staten Island Ferry via Richmond Avenue, the S61 and S91 serve the Staten Island Ferry via Victory Boulevard, the S59 and S89 serve Port Richmond and Eltingville via Richmond Avenue (and the S89 also serves the Hudson Bergen Light Rail in Bayonne, NJ), the S79 serves Bay Ridge, Brooklyn via Hylan Boulevard, and the X17 and X31 buses serve commuters to Manhattan. The weekday-only S55 and S56 serve neighborhoods south and west of the Staten Island Mall.

It is expected that during one or more analysis peak hours, the proposed project could generate more bus trips than the CEQR analysis threshold (200 trips). However, these bus trips would be distributed among the multiple bus lines serving the Mall. Thus, each individual bus line would not be expected to receive 50 or more bus trips in one direction of travel during any analysis peak hours. The EIS will present the bus ridership estimates and demonstrate that a detailed bus line-haul analysis is not warranted.

Staten Island Mall Enlargement

PEDESTRIANS

According to the *CEQR Technical Manual*, detailed pedestrian analyses are not required if the proposed actions are expected to result in less than 200 new peak hour pedestrian trips. This number would normally also include pedestrians walking to a bus stop or off-site parking facility. In this case, however, all auto trips park on site and the majority of the buses stop inside the Staten Island Mall property and thus only the “walk only” trips would use the public street network. As per the TPF Memo, there would be 79, 103, 149, and 175 “walk only” trips expected during the weekday midday, weekday PM, Saturday midday, and Saturday PM peak hours respectively. In addition, these trips would be widely dispersed to sidewalks and crosswalks around the project site. Therefore, a detailed pedestrian analysis is not warranted.

VEHICULAR AND PEDESTRIAN SAFETY

Traffic accidents involving pedestrians as well as bicycles at key study area intersections will be researched and documented. These data will be analyzed to determine if any of the studied locations may be classified per CEQR criteria as high vehicle crash or high pedestrian/bike accident locations and whether trips and changes resulting from the proposed project would adversely affect vehicular and pedestrian safety in the area. The potential for the proposed actions to have significant pedestrian and/or bicycle impacts will be identified and possible remedies and/or improvements will be proposed for DOT consideration.

AIR QUALITY

Ambient air quality, or the quality of the surrounding air, may be affected by air pollutants produced by motor vehicles, referred to as “mobile sources”; by fixed facilities, usually referenced as “stationary sources”; or by a combination of both. An air quality assessment determines both a proposed action’s effects on ambient air quality as well as the effects of ambient air quality on the action.

Air quality analyses will be conducted, following the procedures outlined in the *CEQR Technical Manual*, to determine whether the proposed action under the RWCDs would result in concentrations that would exceed ambient air quality standards or health-related guideline values. The proposed project would generate emissions from both direct and indirect sources. Direct sources of emissions would primarily be from natural gas and/or oil fired heating, ventilation and air conditioning systems (HVAC) associated with the proposed project. Potential indirect air quality impacts of the proposed project would stem from increases in vehicular traffic. Existing uses would be considered if industrial, manufacturing or other facilities of concern that emit pollutants classified as air toxics are identified within 400 feet of the proposed uses. Major and large existing facilities (as defined in the *CEQR Technical Manual*) within 1,000 feet of the proposed uses, if any, would also be considered in the air quality assessment.

MOBILE SOURCE ANALYSES

The vehicle trips generated by the proposed project would likely exceed the *CEQR Technical Manual* carbon monoxide (CO) screening threshold of 170 vehicles in a peak hour at any intersection. In addition, the particulate matter (PM) emissions from project-generated trips, including autos and trucks, would likely exceed the PM_{2.5} screening thresholds specified in the *CEQR Technical Manual*. Therefore, it is expected that an analysis of mobile source (vehicle) emissions of CO and PM (PM₁₀ and PM_{2.5}) would be required. The proposed actions would also

result in new parking facilities. Therefore, a mobile source CO and PM_{2.5} analysis would account for the effects of the parking.

The analysis of potential impacts from mobile source CO and PM_{2.5} emissions would consider locations where the incremental increase of project-generated vehicle traffic over conditions without the proposed project would be greatest. The mobile source analyses will consist of the following:

- *Collection and summary of existing ambient air quality data for the study area.* Specifically, ambient air quality monitoring data published by DEC will be compiled for the analysis of existing conditions. Appropriate background levels will be selected.
- *Selection of analysis and receptor locations.* The ~~e~~Critical intersections in the study area will be selected based on the traffic analysis. CO, PM₁₀ and PM_{2.5} levels at multiple receptor locations sites will be analyzed in accordance with *CEQR Technical Manual* guidelines..
- *Selection of the dispersion model.* The U.S. Environmental Protection Agency (EPA)'s CAL3QHC model would be used for CO analysis and the refined CAL3QHCR intersection model will be used for the PM_{2.5} analysis. For the PM_{2.5} analysis, five recent years of meteorological data from LaGuardia Airport and concurrent upper air data from Brookhaven, New York will be considered.
- *Selection of emission calculation methodology and "worst-case" meteorological conditions.* Vehicular emission factors for the dispersion modeling will be computed using EPA-developed MOVES2014 model and applicable assumptions based on guidance by EPA, DEC and DEP. Re-suspended road dust emission factors will be computed using the EPA procedure defined in AP-42 and the latest *CEQR Technical Manual* guidance.
- *Comparison of modeled CO and PM_{2.5} levels with guidance criteria.* PM_{2.5} increments will be compared to the City's PM_{2.5} interim guidance criteria thresholds. Future pollutant levels with and without the proposed project will be compared with the National Ambient Air Quality Standards (NAAQS) to determine compliance with standards, and the City's CO *de minimis* criteria, and the City's PM_{2.5} interim guidance criteria, to determine the potential mobile source impacts of the proposed project.
- *Parking assessment.* Assess the potential CO and PM_{2.5} impacts associated with proposed parking facilities. Information on the conceptual design of the parking facilities will be employed to determine potential worst-case off-site impacts from emissions. An analysis will be used following the procedures outlined in the *CEQR Technical Manual* for parking facilities to determine maximum potential worst-case impacts. Cumulative impacts from on-street sources and emissions from the proposed parking facilities will be calculated where appropriate.
- *Mitigation.* Examine mitigation measures, as necessary.

STATIONARY SOURCE ANALYSIS

- *Heating and Hot Water Systems.* A screening analysis will be performed to determine whether emissions from any on-site fossil fuel-fired heating and hot water systems (for example, boilers or hot water heaters) are significant. The screening analysis will use the procedures outlined in the *CEQR Technical Manual* that consider the minimum distance of the heating and hot water system exhaust to the nearest building of equal or greater height, the proposed building size, the height of the exhaust and the type of fuel used. The analysis

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will consider the potential cumulative effects of heating and hot water systems on existing uses in the study area, as well as on sensitive uses on-site.

- *Industrial Sources.* The need to assess existing sources or air toxic emissions will be determined based on a field survey and a search of federal, ~~and~~ state and city air permits. If any potential facilities or businesses of concern are identified, a request for information from DEP's Bureau of Environmental Compliance (BEC) files will be made to determine if there are sources of toxic air pollutant emissions within the study area. Based on this information, a determination will be made as to whether a quantified analysis of industrial source emissions is necessary. If needed, an industrial source assessment would be performed using the *CEQR Technical Manual* methodology. The short-term and annual concentrations of critical pollutants at sensitive uses, if any are proposed, would be predicted and compared with the short-term guideline concentrations (SGC) and annual guideline concentrations (AGC) provided by New York State Department of Environmental Conservation (in the DAR-1 AGC/SGC Tables guidance document).

GREENHOUSE GAS EMISSIONS

According to the *CEQR Technical Manual*, a greenhouse gas (GHG) consistency assessment is appropriate for projects being reviewed in an EIS that would result in development of 350,000 square feet or greater. This section of the EIS will quantify GHG emissions generated by the proposed project and assess the proposed project's consistency with the City's established GHG reduction goal. Project-related GHG emissions will be estimated for the 2017 analysis year and reported as carbon dioxide equivalent (CO₂e) metric tons per year. This quantified assessment will include operational emissions (emissions from the operation of the project buildings, including direct and indirect emissions), and mobile source emissions. The construction phase or the extraction or production of materials or fuels needed to construct the project is not likely to be a significant part of total project emissions. Therefore, emissions resulting from construction activity and construction materials will be assessed qualitatively. The project would not fundamentally change the city's solid waste management system. Therefore a quantified assessment of emissions due to solid waste management is not warranted. Features of the project that demonstrate consistency with the City's GHG reduction goal will be described.

The GHG analysis would consist of the following subtasks:

- *Direct Operational Emissions.* Emissions from on-site fossil fuel use, for example in heat and hot water boilers, would be quantified. Emissions would be based on available project specific information regarding the expected energy and fuel use or the carbon intensity factors specified in the *CEQR Technical Manual*.
- *Indirect Operational Emissions.* Emissions from purchased electricity generated off-site and consumed on-site during the project's operation will be estimated.
- *Indirect Mobile Source Emissions.* Emissions from vehicle trips to or from the proposed project will be quantified using trip distances and emission factors provided in the *CEQR Technical Manual*.
- *Construction Emissions.* Emissions from construction and emissions associated with the extraction or production of construction materials will be qualitatively discussed. Opportunities for reducing GHG emissions associated with construction will be considered.
- *Sustainability Features.* Features of the proposed project that reduce energy use and GHG emissions will be discussed and quantified to the extent that information is available.

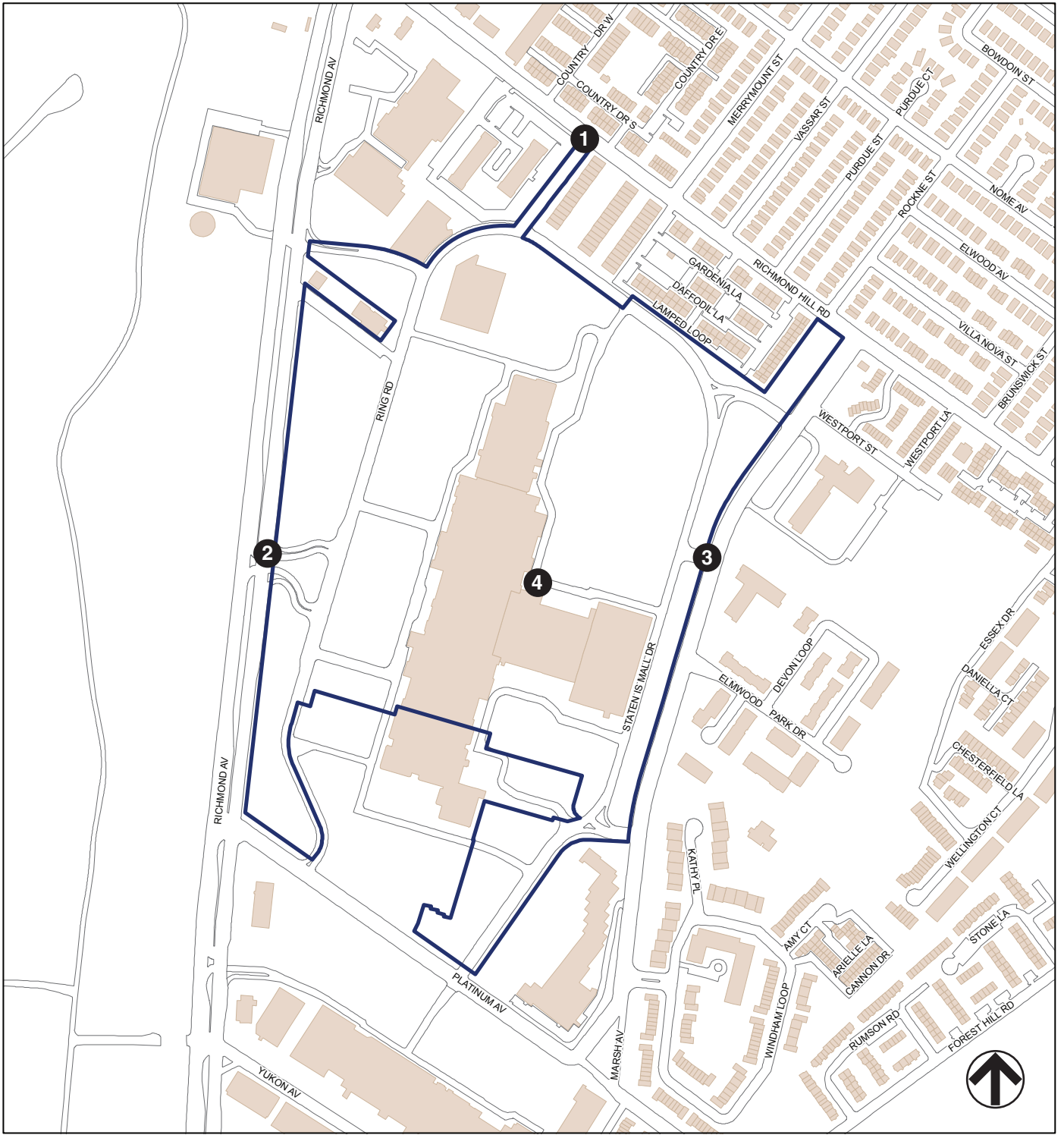
- *Policy Consistency.* Consistency with the City’s GHG reduction goal will be assessed. While the City’s overall goal is to reduce GHG emissions by 30 percent below 2005 level by 2030, individual project consistency is evaluated based on proximity to transit, incentives for sustainable transportation, building energy efficiency, on-site production of renewable or clean energy, efforts to reduce carbon fuel intensity or improve vehicle efficiency for project-generated vehicle trips, and other efforts to reduce the project’s carbon footprint.

NOISE

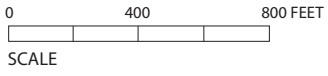
The *CEQR Technical Manual* requires that a noise study be conducted if the proposed project would result in a significant increase in noise levels (particularly at sensitive land uses such as residences, open spaces, etc.), if building attenuation could result in unacceptable interior noise levels within the proposed buildings, or if building mechanical systems could produce noise levels that would result in significant increases in ambient noise. Given that outdoor mechanical equipment would be designed to meet applicable regulations, an analysis of potential noise impacts due to building HVAC equipment is not required. The noise analysis in the EIS will examine the level of building attenuation necessary to meet CEQR interior noise level requirements and will predict future noise levels as a result of the project. The building attenuation study will consider noise levels in the surrounding area associated primarily with traffic noise and assess its potential effect on the proposed project.

The noise analysis would consist of the following tasks:

- Select appropriate noise descriptors. Appropriate noise descriptors to describe the existing noise environment will be selected. The Leq and L10 levels will be the primary noise descriptors used for the noise analysis. Other noise descriptors including the L₁, L₅₀, L₉₀, L_{min}, and L_{max} levels will be examined when appropriate.
- Based on the traffic studies, perform a screening analysis to determine whether there are any locations where there is the potential for the proposed project to result in significant noise impacts (i.e., doubling of Noise PCEs) due to project-generated traffic.
- Select receptor locations for building attenuation analysis purposes. Four (4) receptor locations have been selected, as shown on **Figure 78**. The receptor locations are located adjacent to the site of the proposed project.
- Determine existing noise levels. At each receptor site, a 20-minute measurement would be performed during typical weekday midday, PM, and Saturday midday peak periods. Hourly L_{eq}, L₁, L₁₀, L₅₀, and L₉₀ values will also be recorded.
- Determine future noise levels with the proposed project. At all of the receptor locations identified above, determine noise levels with the proposed project using existing noise levels, acoustical fundamentals, and mathematical models. Noise associated with the proposed parking garage will be calculated using the results of the traffic analyses and procedures outlined in the Federal Transit Administration (FTA) May 2006 guidance manual, *Transit Noise and Vibration Impact Assessment*.
- Determine the level of attenuation necessary to satisfy CEQR criteria. The level of building attenuation necessary to satisfy CEQR requirements is a function of exterior noise levels.
- Determine the level of attenuation necessary to satisfy CEQR criteria. The level of building attenuation necessary to satisfy CEQR requirements is a function of exterior noise levels and will be determined. Measured values will be compared to appropriate standards and guideline levels. As necessary, recommendations regarding general noise attenuation



-  Project Area
-  Noise Receptor



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measures needed for the proposed project to achieve compliance with standards and guideline levels will be made.

PUBLIC HEALTH

According to the *CEQR Technical Manual*, public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability and premature death; and reducing inequalities in health status. The goal of CEQR with respect to public health is to determine whether adverse impacts on public health may occur as a result of a proposed project, and if so, to identify measures to mitigate such effects.

According to the guidelines of the *CEQR Technical Manual*, a public health assessment may be warranted if an unmitigated significant adverse impact is identified in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. If unmitigated significant adverse impacts are identified in any one of these technical areas and the lead agency determines that a public health assessment is warranted, an analysis will be provided for that specific technical area.

NEIGHBORHOOD CHARACTER

Neighborhood character is established by a number of factors, such as land use, zoning, and public policy; socioeconomic conditions; open space; urban design and visual resources; shadows; transportation; and noise. According to the guidelines of the *CEQR Technical Manual*, an assessment of neighborhood character is generally needed when a proposed project has the potential to result in significant adverse impacts in one of the technical areas presented above, or when a project may have moderate effects on several of the elements that define a neighborhood's character.

Methodologies outlined in the *CEQR Technical Manual* will be used to provide an assessment of neighborhood character. Work items for this task are as follows:

- Based on other EIS sections, describe the predominant factors that contribute to defining the character of the neighborhood surrounding the project site, which is marked by a mix of commercial, institutional, and residential uses as well as public open space and highways.
- Based on planned development projects, public policy initiatives, and planned public improvements, summarize changes that can be expected in the character of the area in the future without the proposed project.
- Assess and summarize the proposed actions' effects on neighborhood character using the analysis of impacts as presented in other pertinent EIS sections.

CONSTRUCTION

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. Construction activity could affect transportation conditions, noise patterns, air quality conditions, natural resources, and mitigation of hazardous materials.

The overall construction period is anticipated to be over approximately two years, which is the threshold for detailed analysis under CEQR. Therefore, a detailed qualitative analysis will be provided.

The project site is relatively isolated from potential receptors for air quality, noise, and vibration. In addition, the volume of construction vehicles accessing the site during peak analysis hours is expected to be below operational peak-hour volumes generated by the incremental retail of the proposed enlargement.

The task will describe the construction schedule and logistics, discuss anticipated on-site activities, and provide an assessment of the potential impacts of the proposed project's construction activities, including effects on transportation, air quality, noise, and vibration effects. The analysis will include construction phasing information and logistics documentation, as well as equipment, manpower, and truck trip projections for the construction of the proposed enlargement.

Technical areas to be covered as part of the incremental assessment include:

- *Transportation Systems.* This assessment will consider losses in lanes, sidewalks, and other transportation services, if any, during the construction periods, and identify the increase in vehicle trips from construction workers and equipment.
- *Air Quality.* The construction air quality impact section will contain a discussion of both mobile source emissions from construction equipment and worker and delivery vehicles, and fugitive dust emissions. It will discuss measures to reduce impacts and may include components such as: diesel equipment reduction; clean fuel; best available tailpipe reduction technologies; utilization of equipment that meets specified emission standards; and fugitive dust control measures, among others.
- *Noise.* The construction noise impact section will contain a discussion of noise from each phase of construction activity. Appropriate recommendations will be made to comply with DEP Rules for Citywide Construction Noise Mitigation and the New York City Noise Control Code.
- *Other Technical Areas.* As appropriate, other areas of environmental assessment will be analyzed for potential construction-related impacts.

ALTERNATIVES

The purpose of an alternatives analysis is to examine reasonable and practicable options that avoid or reduce project-related significant adverse impacts while achieving the goals and objectives of the proposed project. The alternatives are usually defined when the full extent of the proposed project's impacts is identified, but at this time, it is anticipated that they will include the following:

- A No Action Alternative, which describes the conditions that would exist if the proposed actions were not implemented;
- A No Unmitigated Adverse Impacts Alternative, if unavoidable adverse impacts are identified in the EIS; and
- A discussion of other possible alternatives that may be developed in consultation with the lead agency during the EIS preparation process or that may be posed by the public during the scoping of the EIS.

For technical areas where impacts have been identified, the alternatives analysis will determine whether these impacts would still occur under each alternative. The analysis of each alternative will be qualitative, except where impacts of the project have been identified.

MITIGATION

Where significant adverse impacts have been identified in the EIS, this chapter will describe the measures to mitigate those impacts. These measures will be developed and coordinated with the responsible City and State agencies, as necessary. Where impacts cannot be mitigated, they will be described as unavoidable adverse impacts.

SUMMARY CHAPTERS

Several summary chapters will be prepared, focusing on various aspects of the EIS, as set forth in the regulations and the *CEQR Technical Manual*. They are as follows:

EXECUTIVE SUMMARY

Once the EIS technical sections have been prepared, a concise executive summary will be drafted. The executive summary will use relevant material from the body of the EIS to describe the proposed action, its environmental impacts, measures to mitigate those impacts, and alternatives to the proposed action.

UNAVOIDABLE ADVERSE IMPACTS

Those impacts, if any, which could not be avoided and could not be practicably mitigated, will be described in this chapter.

GROWTH-INDUCING ASPECTS OF THE PROPOSED PROJECT

This chapter will focus on whether the proposed project would have the potential to induce new development within the surrounding area.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

This chapter focuses on those resources, such as energy and construction materials, that would be irretrievably committed should the proposed project be built. *